



Planning and Transportation Committee

Date: TUESDAY, 30 OCTOBER 2018

Time: 10.00 am

Venue: LIVERY HALL - GUILDHALL

Members:

Christopher Hayward (Chairman)	Shravan Joshi
Deputy Alastair Moss (Deputy Chairman)	Oliver Lodge
Munsur Ali	Alderman Nicholas Lyons
Rehana Ameer	Natasha Lloyd-Owen
Randall Anderson	Andrew Mayer
Peter Bennett	Deputy Brian Mooney
Sir Mark Boleat	Sylvia Moys
Mark Bostock	Barbara Newman
Deputy Keith Bottomley	Graham Packham
Henry Colthurst	Susan Pearson
Peter Dunphy	Judith Pleasance
Stuart Fraser	Deputy Henry Pollard
Marianne Fredericks	James de Sausmarez
Alderman Prem Goyal OBE JP	Oliver Sells QC
Graeme Harrower	Graeme Smith
Christopher Hill	William Upton
Deputy Jamie Ingham Clark	Alderman Sir David Wootton
Alderman Gregory Jones QC	

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Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio visual recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To agree the public minutes and summary of the meeting held on 8 October 2018.

For Decision
(Pages 1 - 16)
4. **MINUTES OF THE LOCAL PLANS SUB COMMITTEE**
 - a) **19 September 2018**
To receive the minutes of the Local Plans Sub Committee meeting held on 19 September 2018.

For Information
(Pages 17 - 24)
 - b) **9 October 2018**
To receive the *draft* minutes of the Local Plans Sub Committee meeting held on 9 October 2018.

For Information
(Pages 25 - 34)
5. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**
Report of the Chief Planning Officer and Development Director.

For Information
(Pages 35 - 46)
6. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**
Report of the Chief Planning Officer and Development Director.

For Information
(Pages 47 - 50)

7. **LAND TRANSACTIONS - FORMER RICHARD CLOUDESLEY SCHOOL SITE**

Report of the Town Clerk.

For Decision
(Pages 51 - 68)

8. **BLOOMBERG EUROPEAN HEADQUARTERS WINS THE 2018 STIRLING PRIZE**

Report of the Chief Planning Officer and Development Director.

For Information
(Pages 69 - 70)

9. **CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED DRAFT PLAN**

Report of the Director of the Built Environment.

N.B.: The Policies Maps at Appendix 2 (parts A&B) will be available/on display in A3 size at the meeting. Likewise, the Draft Plan itself at Appendix 1 contains various coloured maps and diagrams and so coloured hard copies will also be made available at the meeting.

For Decision
(Pages 71 - 284)

10. **DRAFT CITY OF LONDON TRANSPORT STRATEGY**

Report of the Director of the Built Environment.

For Decision
(Pages 285 - 442)

11. **REDEVELOPMENT OF 6-8 BISHOPSGATE AND 150 LEADENHALL STREET - ACQUISITION OF LAND FOR PLANNING PURPOSES**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 443 - 574)

12. **BLACKFRIARS BRIDGE PARAPET REFURBISHMENT AND BRIDGE RE-PAINTING - GATEWAY 3/4 OPTIONS APPRAISAL**

Report of the Director of the Built Environment.

N.B.: Appendix 1 will follow as a separately circulated, late document.

For Decision
(Pages 575 - 622)

13. **TRANSPORT FOR LONDON BUS RATIONALISATION PROPOSALS ACROSS LONDON**

Report of the Director of the Built Environment.

For Decision
(Pages 623 - 672)

14. **OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information
(Pages 673 - 680)

15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

17. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-public Agenda

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 8 October 2018.

For Decision
(Pages 681 - 682)

19. **NON-PUBLIC MINUTES OF THE LOCAL PLANS SUB COMMITTEE**

To receive the *draft* non-public minutes of the Local Plans Sub Committee meeting held on 9 October 2018.

For Information
(Pages 683 - 684)

20. **THAMES COURT FOOTBRIDGE**

Report of the Director of the Built Environment.

N.B. – This will be a late, separately circulated report.

For Information
(TO FOLLOW)

21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Any drawings and details of materials submitted for approval will be available for inspection by Members in the Livery Hall from Approximately 9:30 a.m.

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PLANNING AND TRANSPORTATION COMMITTEE

Monday, 8 October 2018

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.00 am

Present

Members:

Christopher Hayward (Chairman)	Shravan Joshi
Deputy Alastair Moss (Deputy Chairman)	Oliver Lodge
Randall Anderson	Andrew Mayer
Peter Bennett	Deputy Brian Mooney
Sir Mark Boleat	Sylvia Moys
Mark Bostock	Barbara Newman
Deputy Keith Bottomley	James de Sausmarez
Marianne Fredericks	Oliver Sells QC
Alderman Prem Goyal OBE JP	Graeme Smith
Christopher Hill	William Upton
Deputy Jamie Ingham Clark	Alderman Sir David Wootton

Officers:

Angela Roach	- Assistant Town Clerk
Gemma Stokley	- Town Clerk's Department
Richard Holt	- Town Clerk's Department
Jennifer Ogunleye	- Media Officer
Deborah Cluett	- Comptroller and City Solicitor's
Simon Owen	- Chamberlain's Department
Annie Hampson	- Chief Planning Officer and Development Director
Zahur Khan	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Bhakti Depala	- Department of the Built Environment
David Horkan	- Department of the Built Environment
Ian Hughes	- Department of the Built Environment
Paul Monaghan	- Department of the Built Environment
Gordon Roy	- Department of the Built Environment
Craig Stansfield	- Department of the Built Environment
Kathryn Stubbs	- Department of the Built Environment

Chairman's Welcome

The Chairman welcomed Zahur Khan, the newly appointed Transportation and Public Realm Director, to his first meeting of the Planning and Transportation Committee.

The Chairman also welcomed the Committee's new, permanent, Clerk Gemma Stokley.

1. **APOLOGIES**

Apologies for absence were received from Rehana Ameer, Henry Colthurst, Peter Dunphy, Stuart Fraser, Graeme Harrower, Alderman Nicholas Lyons, Graham Packham, Susan Pearson, Judith Pleasance and Deputy Henry Pollard.

Apologies for absence were also received from Carolyn Dwyer, Director of Built Environment.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

The Deputy Chairman declared a non-pecuniary, professional interest in relation to Agenda Item 10 – '21 Moorfields – Acquisition of Land' – and stated that, on the advice of the Comptroller and City Solicitor, he would be withdrawing from the meeting whilst this Item was considered and would neither speak nor vote on the matter.

3. **MINUTES**

The public minutes and summary of the meeting held on 11 September 2018 were considered and approved as a correct record.

MATTERS ARISING

Communication Totems (page 2) – A Member referred to a recent article suggesting that communication totems in the City were 'data harvesting' from mobile phones. She questioned whether this practice was legal given that passers-by would not be aware that this was the case. She referred to a similar issue which had arisen previously concerning recycling bins in the City. The Chief Planning Officer undertook to make enquiries about this but stated that she was certainly not aware that this was the case. The Chairman underlined the need to ensure that any data harvesting that might be taking place was both statutorily compliant and mindful of any data protection implications. Members suggested that it was important to ask these sorts of questions up front in future.

The Comptroller and City Solicitor clarified that, unlike with the previous occurrence referred to which concerned recycling bins in the City, there was no relationship between the City of London Corporation and the totem providers as far as she was aware. Officers nevertheless undertook to explore this matter further given that the City Corporation were the land owners and report back to the Committee.

Golden Lane Community Centre (page 6) – A Member questioned whether some further detail could be provided relative to the 'additional condition' that was to be imposed to address accessibility of the interview room and had been delegated to the Chief Planning Officer to finesse in consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee at the last meeting. The Chief Planning Officer clarified that the additional

condition related to use of the Community Centre as an Estate Office and was as follows: “Notwithstanding the details of the office layout shown on drawing 2325_PL_109_2, the use of the sui generis office area shall not commence until details of an interview room have been submitted to and approved by the Local Planning Authority that meet the requirements of Local Plan policy DM10.8 which shall be constructed prior to first occupation in accordance with the approved drawings and maintained thereafter whilst the use is in operation. REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8”.

Queenhithe Riverside Walkway (page 13) – A Member stated that he was still awaiting an update on this matter. The Chief Planning Officer undertook to work alongside Officers in Highways to provide the Member with a written response as soon as possible.

Thames Court Footbridge – A Member requested an update on this matter. The Assistant Director (Highways) reported that, despite an open invite, only two tenders for the works had been returned – both of which were significantly over the original budget. City Procurement were now planning to meet with both tenderers to renegotiate where possible. Members were informed that a report on possible options going forward to the next meeting of the Planning & Transportation Committee.

4. **MINUTES OF THE STREETS AND WALKWAYS SUB COMMITTEE**

The Committee received the public minutes and summary of the Streets and Walkways Sub (Planning and Transportation) Committee held on 4 September 2018.

The Committee were of the view that future minutes of the Sub Committee submitted to the Grand Committee for information should be clearly marked as ‘draft’. It was agreed that the draft minutes of the Sub Committee would only need to be re-submitted to the Grand Committee if there were any material changes to them once they had been approved as a correct record.

RECEIVED.

5. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**

The Committee received a report of the Chief Planning Officer and Development Director in respect of development and advertising applications determined by the Chief Planning Officer and Development Director or those so authorised under the delegated powers since the last meeting.

RECEIVED.

6. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**

The Committee received a report of the Chief Planning Officer and Development Director detailing development applications received by the

Department of the Built Environment since the last meeting of the Planning and Transportation Committee.

RECEIVED.

7. CREED COURT HOTEL

The Committee considered a report of the Chief Planning Officer and Development Director concerning an application under Section 73 of the Town and Country Planning Act 1990 to vary condition 49 (approved drawings) of planning permission dated 6 October 2017 to enable (i) removal of third basement level; (ii) internal reconfiguration to create 152 hotel rooms and associated alterations to the fenestration on Ludgate Square, Creed Lane and to the internal courtyard; (iii) relocation of the UKPN sub-station from basement to ground floor level; (iv) reduction in A3 (restaurant) floor area from 1,028sq.m to 466sq.m and relocation of the restaurant entrance door to Creed Lane; (v) reconfiguration of the waste storage facilities and service area; and (vi) other minor internal and external alterations.

The Assistant Director, Planning Development, introduced the application and presented the officer's report, informing the Committee about the details of the scheme and its wider implications. Photographs of residential amenity in the existing courtyard were tabled at the meeting. The application was recommended for approval in accordance with the details set out in the report.

The Chairman highlighted that there were three objectors who wished to address the Committee as well as a speaker on behalf of the applicant. In response to a question, the Chairman clarified that all those addressing the Committee had been made aware of the Protocol on Public Speaking and to limit their speech to planning matters only.

Sir Brian Langstaff, a local resident, addressed the Committee in objection to the application. Sir Langstaff spoke with concern about the principle of securing planning permission for one scheme and then altering this in ways which may be perceived as non-material but will, in reality, make a substantial difference to the scheme overall. Consent had been given, in 2017, for construction of what was thought to be an upmarket hotel in keeping with the St Paul's conservation area. The modified plans now seemed to be for a more 'downmarket' offering with a greater number of smaller bedroom spaces, a smaller restaurant space and no spa facilities. He went on to state that he was strongly of the view that any changes should not adversely affect the amenity of neighbouring residents over the consented scheme. However, the revised plans would result in some loss of light, cause inevitable problems by seeking to roughly double the number of windows looking on to the courtyard (onto which residents' bedrooms also face) and also run a real risk of noise from both the courtyard below where guest access no longer appeared to be restricted as it had been in the consented plan and the combined effect of noise/overlooking from guest use of the roof terrace.

Sir Langstaff concluded by suggesting that, in order to safeguard against these concerns, either the plans required modification and should be rejected for the

time being, or sufficient and suitable conditions needed to be imposed to ensure that the revisions do not affect neighbouring amenity further than the present plans already do.

Matthew Rimmer, also a local resident, addressed the Committee in objection to the application. Mr Rimmer stated that, although the revised plans sought to relocate the Hotel's sub-station from basement to ground floor level, the depth of the construction was to remain the same as on the consented plans. To his mind, this represented an opportunity for the developer to carry out less intrusive ground works and the fact that they had not taken this opportunity was 'lazy' on their part.

Jeremy Stein addressed the Committee on behalf of his client (a local resident) in objection to the application. He reported that, at present, his client enjoyed clear, peaceful views of St Paul's Cathedral from their top floor residence and they were of the view that this must remain. He went on to state that his client's primary concerns were around use of the rooftop and courtyard areas. The consented plans were for a green rooftop area where access would be restricted to maintenance only. This restriction appeared to have been removed for both the rooftop and the courtyard area in the modified plans. Mr Stein made a plea for the condition around this to remain and for an additional condition to be added requiring the developer to fund the installation of a CCTV system which would use motion alerts to inform them of any unauthorised use of the rooftop and courtyard areas.

Mr Stein added that his client also had concerns around the proposed new bedroom layouts which represented a more downmarket offering with many of the proposed new rooms being behind fixed shut windows with no natural daylight.

Mr Stein informed the Committee that demolition had already begun on site and asked that residents be provided with a full programme of anticipated works throughout the development period in addition to the monthly newsletters already in circulation. He added that the fact that demolition had already commenced underlined that it was not necessary for the Committee to take a decision on the revised plan this morning as it would not cause any undue delay to the planned works.

Mr Stein concluded by stating that the hotel's future revenue was not dependent on the number of bedrooms offered. He suggested that the modified plans needed revisiting and that, whilst residents accepted that a hotel was to be constructed on this site, it was hoped that it would be a high class offering in keeping with the area and not the 'downmarket' version that was now being presented.

Richard Ward, Director of DP9 Limited, address the Committee on behalf of the applicant, in support of the application. He was accompanied by Paul Wells of Dexter Moren Architects and Gordon Ingram of Gordon Ingram Associates. Mr Ward underlined that the proposals brought with them several benefits whereby a redundant office building would be replaced with a 4* plus hotel and frontage

in keeping with the area. Its construction would also contribute towards the City's affordable housing efforts as well as creating jobs both during and after construction. He added that the proposed amendments represented an exciting new scheme that the applicant was keen to deliver as quickly as possible.

A Member asked the applicant's agent why they had taken the decision to submit revised proposals given that the original proposals consented to only last year had been 3-4 years in the making. She also sought confirmation as to whether demolition work had already started on site and, if it had, was it in accordance with the conditions attached to the consent granted in 2017.

The Applicant confirmed that new proposals were being submitted following the appointment of a new architect who had brought a 'fresh pair of eyes' to the process and produced what Officers agreed was an enhanced version of the proposals consented to by this Committee last year. He went on to confirm that demolition had commenced on site and that this had been done in accordance with the conditions discharged.

In response to further questions from Members, the applicant reported that it had always been the intention that the finished hotel would constitute a four star plus offering. They were strongly of the view that what was now being proposed was an enhanced offer as opposed to a downgrading of any sort. In response to questions around the overlooking of residential properties and associated light invasion, the applicant reiterated that the windows looking on to the courtyard area were fixed glaze windows.

Finally, the applicant confirmed that they would be happy to commit to the provision of CCTV as proposed by the objector and would also undertake to provide residents with a full schedule of anticipated works.

Members went on to debate the application before them. A Member questioned the information provided within the daylight/sunlight assessment and how this translated to an overall improvement when compared to the already approved scheme. The Assistant Director, Planning Development, clarified that whilst there would be some impacts on the daylight and sunlight received by neighbouring properties, the majority of these impacts would be minor in nature.

A Member commented that she was disappointed to see revised proposals submitted to the Committee so soon after it had originally been deliberated on. She reminded the Committee that concerns around the fact that this was a residential site and around the impact of things such as servicing were aired when the application had originally been considered but that Members had been reassured at the time that what was being proposed was a high-class hotel offering in a prime position. She stated that it was her view that, had these amendments featured in the original scheme, it may not have been consented to. Another Member supported this view and stated that he objected to what he saw as major amendments to the original proposals being submitted to the Committee so soon particularly given the sensitivity of the site. He also referred

to the fact that a number of the newly proposed bedrooms would seemingly be without any natural light – something which he felt was unreasonable.

Another Member disagreed with these points and stated that he felt that the speed with which the plans had been amended and resubmitted was reflective of an active market and was arguably a normal part of the development process. He added that he did not perceive the proposed changes as significant and therefore saw no reason not to support the application on purely planning issues.

In response to a question from the Chairman, the Comptroller and City Solicitor stated that the original application was not now re-open for debate and that Members were to focus on the proposed amendments only this time around. The Town Clerk highlighted that the list of proposed amendments in full could be found on the opening page of the report and were a helpful aid in terms of focusing discussion.

A Member commented that the proposed relocation of the sub-station from basement to ground floor level did not seem to be an improvement and questioned the reasoning behind this. The Assistant Director, Planning Development, stated that he understood that this was for ease of access and stated that it was often the case that sub-stations were situated at ground floor level and that appropriate conditions would be attached to this.

In response to questions from the Chairman, Officers clarified that residents' concerns around the installation of a CCTV system to monitor rooftop and courtyard usage and blackout blinds to certain windows could be addressed by incorporating reference to these within the conditions. A condition requiring adequate liaison between the developer and residents could also be incorporated.

A Member stated that she was pleased to see that Creed Archway would be retained within the amended proposals.

The Chairman underlined that it was the developers right to be able to return to the Committee with amendments and that it was not for Members to get in to the commerciality of the proposals.

The application was put to the vote amongst eligible Committee Members, with 16 voting for and 3 voting against the application, with no abstentions.

RESOLVED – That, Planning permission be granted for the above proposal in accordance with details set out in the attached schedule, subject to:

- (i) Planning obligations being entered into as set out in the body of this report, the decision not being issued until such obligations have been executed;

- (ii) That Officers be instructed to negotiate and execute obligations respect of those matters set out in “Planning Obligations” under Section 106 of the Town & Country Planning Act 1990.

8. TENTER HOUSE 45 MOORFIELDS LONDON EC2Y 9AE

The Committee considered a report of the Chief Planning Officer and Development Director seeking approval for the demolition of existing building and structures to existing basement slab level and construction of an 18 storey office building (Class B1) with ground and first floor retail (Class A1/A2/A3/A5), together with works to the two basements and the ground floor level with associated servicing, waste storage, plant facilities and cycle parking and public realm improvements to New Union Street.

Officers presented the report to Members, outlining details of the scheme and its wider implications. In light of objections received (primarily around the potential for noise from the roof terraces), conditions limiting the use of these areas at night were proposed. With regard to the reductions in sunlight and daylight to some residents, independent assessments had concluded that any loss was, in fact, due to the presence of overhanging balconies and not the size of the proposed development.

A Member commended Officers on refining the proposals in light of objections received. Members went on to question the possibility of the use of an external consolidation site for the servicing of the building. Officers stated that they had already suggested that this was something that the applicant should explore. The number of deliveries had been limited to 72 vehicles per day. Members suggested that this could be included as a condition.

A Member stated that they would like to see the use of light sensors conditioned. Another Member reported that, whilst they were fully supportive of the proposals, they had some concern around New Union Street and how this would operate in terms of pedestrians and any conflict with vehicles utilising the loading bay. It was suggested that a better signed access route should be established to ensure that it was clear that this was for pedestrian use. Officers reported that there would be substantially less vehicle traffic in this area than previously. He added that Union Street was not under the control of the applicant along its full length and could not therefore be fully pedestrianised.

A Member commented on the number of extra people that the proposed development would attract to the area and the fact that no extra pedestrian space would be provided as a result. He was concerned that the proposal compromised the main area of open space in this area which was set to become even more crowded still with the impending opening of Crossrail.

In response to a question regarding the ‘bleepers’ of reversing vehicles on site, Officers stated that whilst it was not possible to silence these due to health and safety reasons, their use was not permitted on site after 21:00.

The Deputy Chairman referred to the fact that the forthcoming Transport Strategy was explicit in stating that consolidation sites for the servicing of the

City would be the expectation going forward. He felt that it was therefore important to begin to emphasise this point with developers for the future proofing of sites. He suggested that the developer be asked to submit an annual Traffic Management Plan for consideration with commentary on the possible use/introduction of a freight consolidation site. Another Member seconded this proposal.

Members proceeded to vote on this amendment and it was carried unanimously.

Members then proceeded to vote on the application before them with 20 voting for and 1 voting against. There were no abstentions.

RESOLVED – That:-

- (a) Planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to an additional condition requiring the annual submission of a Traffic Management Plan with commentary on the possibility of the introduction of a freight consolidation centre and subject to planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed;
- (b) Officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

9. **BARBICAN AND GOLDEN LANE PROPOSED CONSERVATION AREA**

The Committee considered a report of the Chief Planning Officer and Development Director proposing that one conservation area be designated to include an area which would comprise the Barbican and Golden Lane Estates, the Barbican Registered Park and Garden, the Barbican Wildlife Garden, Bridgewater Square and the London Wall Scheduled Ancient Monument west and north of Monkwell Square.

The Chairman highlighted that the proposals presented had been shaped by public consultation carried out between December 2017 and February 2018. The Assistant Director, Historic Environment, reported that some additional representations had been received after publication of the report but underlined that these contained no additional concerns to those that had already been raised elsewhere. She went on to report that there had been an adjustment to the proposed boundary to include the Barbican Wildlife Garden and that this had been approved in consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee.

A Member stated that he very much welcomed this report and felt that Officers had been very responsive to the views expressed as part of the public consultation process. He added that he was pleased to see that the proposals now included the Barbican Gardens in their entirety. However, the fact that certain buildings were not to be included within the conservation area

(specifically 45 Beech Street and the Jewish Church) appeared to be a missed opportunity.

The Deputy Chairman stated that any redevelopment would have to consider the character of the adjoining Conservation area and that the importance of these buildings could therefore be recognised without having to necessarily include them within the proposed conservation area and adjust the boundaries.

A second Member stated that she also felt that it was a mistake not to include these buildings within the conservation area and proposed an amendment seeking to adjust the proposed boundaries to include these. Another Member seconded this proposal and it was put to the vote. 9 voted in favour of the amendment and 10 against with 2 abstentions.

RESOLVED – That, having considered the results of the public consultation, analysis and conclusions, Members agree to designate the area identified on the map in Appendix 1 as the Barbican and Golden Lane Conservation Area.

10. **REDEVELOPMENT OF 21 MOORFIELDS - ACQUISITION OF LAND**

The Deputy Chairman withdrew from the meeting at this point.

The Committee considered a report of the Chief Planning Officer seeking approval for the acquisition of land for planning purposes by agreement under section 227 of the Town & Country Planning Act 1990 enabling the operation of powers under Section 203 of the Housing & Planning Act 2016 to facilitate the carrying out of the redevelopment of 21 Moorfields.

RESOLVED – That, Members authorise acquisition of an interest in the Redevelopment Site by the City under S227 in order to engage powers under S203 for the planning purpose of facilitating the carrying out of the revised development (as described in paragraph 4 of the Main Report) and subsequent disposal of that interest to the Owner (or an associated company) under section 223 of the Town & Country Planning Act.

Subject to:

- (i) the City Surveyor being satisfied, following receipt of Counsel's opinion, that the risks associated with the transaction are acceptable;
- (ii) there being a suitable Deed of Indemnity (as described in Paragraph 22) in place satisfactory to the City Surveyor; and
- (iii) the acquisition and disposal referred to above being substantially in accordance with the arrangements in Appendix 2 to this report with authority being delegated to the City Surveyor to agree final terms.

11. **SITE VISITS FOR MEMBERS IN RELATION TO PLANNING APPLICATIONS**

The Deputy Chairman re-joined the meeting.

The Committee considered a report of the Chief Planning Officer and Development Director in relation to site visits for planning applications on the Committee Agenda. The report sought Members' views as to whether visits

should be in relation to all planning applications or certain classes of applications and how these are to be organised.

The Chairman underlined that the suggestion was that site visits were offered for all future major applications and that this approach was to be trialled for a period of three months to assess its popularity.

A Member suggested that the Thursday morning visits proposed within the report would be problematic given that Court of Common Council meetings also took place on Thursdays. She also suggested that attendance lists should be published for all future visits.

Members went on to make a plea for more clarity around future visits in terms of which Officers would be accompanying Members and where they were to meet. A request for transport from Guildhall for future visits was also noted.

A Member suggested that a six-month trial would be more sufficient in terms of assessing the popularity of such visits and deciding whether any alterations were then needed.

A Member suggested that a list of pertinent issues should be circulated to Members ahead of all such visits in future. It was also suggested that four days ahead of an application being formally considered by the Committee was not sufficient time for such visits and that the agenda planning process should be utilised to flag any major or genuinely contentious applications at a much earlier stage.

In response to a question, the Comptroller and City Solicitor clarified that those Members who were unable to participate in a site visit would not then be restricted in terms of speaking or voting on a given application at Committee.

RESOLVED – That:

- a) A site visit is offered for Major Applications and
- b) other applications where the impact can only be considered from a non-public place;
- c) the visit(s) should take place as soon as Officers are aware of the forthcoming application via the agenda planning process;
- d) if there is more than one site to visit time slots will be provided;
- e) the appropriate officers will be available to answer questions;
- f) these visits would not normally be accompanied by the applicant or objectors except for the purpose of gaining access;
- g) Members should advise by 2pm on the day before the proposed site visit if they wish to attend, (if more than one, which ones) using a dedicated inbox;
- h) This is trialled for six months to test its popularity and to see whether alterations need to be made to the arrangements; and
- i) Transport to and from Guildhall is to be provided for such visits.

At this point, the Chairman sought approval from Committee Members to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

12. PARKING ENFORCEMENT: PERMITTED LOADING AND UNLOADING DURATIONS

The Committee considered a report of the Director of the Built Environment regarding a review of the protocol allowing commercial vehicles 40 minutes to continuously load and unload on-street.

The Assistant Director (Highways) stated that this issue fitted well within the City's forthcoming Transport Strategy which would provide an overarching approach to freight in the City.

The Chairman stated that he was strongly of the view that 40 minutes was far too long and that his ambition would be to attempt to half this in the City.

A Member expressed concern at the timing of any review if it were to be linked to the Transport Strategy. She suggested that consultation on the matter should commence as soon as possible given the huge impact of this on the City.

A Member agreed with the urgency that should be attached to this matter. He reminded the Committee that the 40-minute rule had been in place for ten years now yet the volume of traffic in the City had escalated hugely in this time.

Another Member stated that it would be important to see that any revision to the continuous loading and unloading time was also adequately policed and enforced going forward.

RESOLVED – That Members agree that:

- A review of the current 40min permitted loading and unloading period be undertaken as an early outcome of the Transport Strategy adoption process and, in any event, not later than the end of 2019 and
- Appropriate data capture, informal engagement with the freight industry and discussion with London Councils be undertaken to inform this review in the interim period.

13. CONGESTION MITIGATION: PARKING, TRAFFIC & CYCLING ENFORCEMENT RESOURCES

The Committee considered a report of the Director of the Built Environment concerning congestion mitigation: Parking, Traffic and Cycling Enforcement resources.

The Town Clerk reported that the Resource Allocation Sub Committee had considered the report at their meeting on 4 October 2018 and had approved the necessary funding.

The Assistant Director (Highways) reported that it was proposed that additional Indigo officers were used in the evening given the changes in traffic flow in the

City at this time and that new technology was reinvested in in order to enhance the parking enforcement service as a whole. The report also recommends funding from the On-Street Parking Account be set aside to allow the introduction of three new City Corporation Traffic & Congestion Officers, whose role would be specifically aimed at identifying and resolving congestion hotspots on the ground and tackling things that Indigo currently cannot. Through a new City Police accreditation system, they would also have the authority to stop and direct traffic as well as to deal with minor police enforcement duties such as low-level cycling offences.

Members were told that this should be viewed as a positive step towards being able to deal with these kinds of issues in 'real time' and providing additional resources to help improve the effectiveness and safety of the City's road network.

A Member commented that this clearly presumed that the income generated in this area would outweigh the expense. He asked that this be monitored and that a report on this and the overall effectiveness of the initiative be brought back to Committee in a year's time.

RESOLVED – That, Members of the Planning and Transportation Committee:

- Approve the supplementary parking enforcement measures outlined in this report and
- Approve the introduction of three City Corporation Traffic & Congestion Officers for an initial two-year period to be focused on congestion and road safety issues.

14. **GREEN INITIATIVES IN THE CITY**

The Committee received a report of the Director of the Built Environment presenting information on green initiatives in the City of London and outlining the results of a study into the use of a technique called Urban Greening Factor (UGF) as a means of delivering additional greening.

The report indicated that the City was surprisingly 'green'. A Member stated that there had been a number of new trees planted in the City since 2010 and that it was disappointing to not see this referred to within the report. It was suggested that the City Commons at Ashted and West Wickham should also be referred to in order to demonstrate the breadth of the City's green interests.

A Member commented that the map at Appendix 1 depicting the distribution of trees across the City seemed to show a lack of planting in the Fleet Street area and the South Western block of the City. He therefore questioned how many trees had been planted here in the past 12 months or how many were planned in future for this area specifically.

Officers undertook to report back to Members on the number of trees planted and in which areas in recent years.

A Member stated that the initial cost of any future planting needed to be taken in to account as well as the ongoing maintenance of any trees planted.

A Member referred to the statement which highlighted that ground level space was at a premium in the City within the report and questioned whether this Committee and its Officers should be bold in future and focus on the provision of open/pedestrian space with developers. He suggested that perhaps a factor could be adopted going forward whereby developments likely to attract in excess of, say, 1,000 additional people to a certain area would be required to have a ratio applied in terms of how much space they should then look to provide for general public use at ground level.

The Chairman stated that the Local Plan would be the correct vehicle for considering the provision of public space at ground level and reminded Members that the draft document would be brought to the next meeting of this Committee for consideration.

RESOLVED – That Members note the green initiatives being undertaken in the City outlined in this report and the potential further progress under the Urban Greening Factor (UGF).

15. **OUTSTANDING REFERENCES**

The Committee received a report of the Town Clerk listing their Outstanding References which had been recently updated with the help of the responsible Officers.

Ludgate Circus

The Assistant Director (Highways) reported that updates had been received from TfL on their actions to date since the time of publication of this report. Collision diagrams had now been provided and these highlighted that the main cause for these were left turning vehicles in conflict with pedestrians crossing informally.

Members were informed that TfL had now agreed to allow the City to use their Enforcement Team to assist in undertaking cycle behaviour training at the Ludgate Circus Junction. TfL had also agreed to look in to the cost of surveys on the junction and report back. A review of signal timings at the junction would also take place in the next few months.

The Deputy Chairman stated that whilst he was not surprised by TfL's conclusion that the biggest risks here related to pedestrians crossing informally, he would like to ensure that they were not dismissive of the issue simply because it happens elsewhere. He asked that City Officers continue to press TfL to identify ways in which these informal crossing routes could be made safer and more pedestrian friendly.

Blackfriars Bridge Underpass

Members were informed that TfL had undertaken tar repairs in the underpass and that a deep clean of the area had also been undertaken by City Highways. TfL had now also undertaken to look at the issue of rough sleeping here alongside the City's own outreach team. The Assistant Director (Highways) was

pleased to report that, although progress to date was slower than hoped, things were certainly moving in the right direction.

In response to a question regarding whether LED lighting would be used in the underpass, the Assistant Director (Highways) stated that he assumed that this would be the case given that it was best practice. He undertook to look in to this further and to report back to the Member on this matter.

Wind Measurement on Tall Buildings

The Chairman informed Members that a report on this matter would be brought to the December 2018 meeting of this Committee.

A Member questioned whether this report was intended to cover all those areas which the Committee would like to keep under review. He stated that, if so, he would like to see reference to Fumes and to Pavements included given that these were both issues he had requested further information on previously.

A Member requested that the names of responsible Officers also be added to all Outstanding References going forward.

16. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

Residents Association representation at Annual Committee Dinners

In response to a question, the Chairman reported that he would be happy to include Residents Association representatives on the Annual Committee Dinner guest list going forward and had already confirmed this in writing to the Member who had originally posed this question.

17. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Annual Committee Dinner

The Chairman reported that the 2018/19 Committee Dinner would take place on Thursday 21 February 2019 at Glaziers Hall.

Local Development Plan and Transport Strategy Member Briefing

The Deputy Chairman reminded Members that an informal briefing on the Local Development Plan and Transport Strategy that was open to all Members of the Planning and Transportation Committee was scheduled for 10.30am on Thursday, 11 October 2018. He stated that prior notice of any specific issues/themes which Members wished to explore within this context would be useful in terms of focusing discussion on the day.

18. EXCLUSION OF THE PUBLIC

RESOLVED – That, under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item No.	Exempt Paragraph(s)
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19-20 3
21-22 -

19. NON-PUBLIC MINUTES

The Committee considered and approved the non-public minutes of the meeting held on 11 September 2018.

20. NON-PUBLIC MINUTES OF THE STREETS AND WALKWAYS SUB COMMITTEE

The Committee received the draft non-public minutes of the Streets and Walkways Sub (Planning and Transportation) Committee meeting on 4 September 2018.

21. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions raised in the non-public session.

22. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no additional, urgent items of business for consideration in the non-public session.

The meeting closed at 12.22 pm

Chairman

**Contact Officer: Gemma Stokley
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LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Wednesday, 19 September 2018

Minutes of the meeting of the Local Plans Sub (Planning and Transportation) Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Christopher Hayward (Chairman)	Mark Bostock
Deputy Alastair Moss (Deputy Chairman)	Marianne Fredericks
Randall Anderson	Dhruv Patel OBE

Officers:

Gemma Stokley	- Town Clerk's Department
Adrian Roche	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Jonathan Blathwayt	- Department of the Built Environment
John Harte	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Alanna Coombes	- Department of the Built Environment
Joseph Anstee	- Town Clerk's Department

1. APOLOGIES FOR ABSENCE

Apologies were received from Deputy Keith Bottomley.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. MINUTES

The Sub-Committee noted that at the previous meeting they had agreed that the minutes of the discussion in the non-public section at the last meeting should be moved into the public section and asked that the Town Clerk make this change before republishing the minutes.

RESOLVED – That, pending the above correction, the minutes of the meeting held on 18 July 2018 be agreed as a correct record.

4. CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED DRAFT POLICIES

The Sub-Committee considered a report of the Director of the Built Environment, presenting four final sets of draft policies, relating to Planning Contributions; Vehicular Transport and Servicing; Walking, Cycling and Healthy Streets; and the Key Areas of Change, for discussion and agreement.

The Director of the Built Environment advised Members that this would be the last meeting discussing the content of the policies before the full plan was presented to Members ahead of the next phase.

The Chairman explained that he would go through the report policy by policy and take comments.

Core Strategic Policy CSXX: Planning Contributions and Policy DM XX: Viability Appraisals

The Director of the Built Environment advised that the core of the policy was largely the same as the current policy. The policy on viability appraisals took previous feedback on board and increased the requirement to be open and public. Land values would not be a consideration of the appraisals, and a Member suggested that this be made explicitly clear in the policy. The policy was consistent with the Mayor of London's Strategy and the National Planning Policy Framework.

In response to a query from a Member, the Director of the Built Environment responded that the price used for affordable housing was based on that used in 2012 and needed to be revised. As this was part of the relevant Supplementary Planning Document (SPD) this could be enacted through a change to the City of London Corporation website. It was important to do more on viability so that the Corporation could be stronger about onsite affordable housing. A Member suggested that if affordable housing was not provided onsite, then double the number of units should be provided offsite.

A Member asked how officers would establish the independence of valuers. The Director of the Built Environment responded that officers had previously written to valuers asking for bids to provide the service but would refresh and widen this process to make it more formal.

A Member commented that the Sub-Committee had previously agreed to look at land value and not yet done so, and if changes could be made via the SPD then this should be done. The Department of Community and Children's Services could share the build costs for the City of London Primary Academy Islington as an example. The Corporation could be losing out financially if plans were not being updated.

The Director of the Built Environment responded that they would speak to colleagues in DCCS and get their figures and look to incorporate any increase into the SPD. This may require consultation if the increase was significant.

A Member commented that developments were complex, and the starting point was vital for viability considerations. If the Corporation laid down a marker at the outset of a project and examined the approach that a developer planned to take, the Corporation would have more traction on viability considerations later on.

A Member suggested strengthening the language of the paragraph addressing affordable housing. This would help to manage the expectations of developers.

Core Strategic Policy CS XX: Vehicular Transport and Servicing

The Director of the Built Environment advised Members that the key point was that the Local Plan and Transport Strategy were being drafted at the same time. The policy reflected the current draft of the Transport Strategy, which was subject to change.

A Member suggested stronger wording on point 3 to push for more step-free access in the City and hoped that this could be tied in to policy on servicing, as keeping blockages off the road was also important for accessibility.

A Member suggested looking at point 4c and the meaning of 'essential' traffic, as taxis were only essential for disabled passengers. The Chairman added that the word 'essential' could be taken out. This point could be double-checked against the Transport Strategy and given more definition if necessary.

Policy DM X: The impacts of development on transport

A Member queried whether the policy should have regard to the cumulative effects of nearby developments. A Member asked officers to check that 10 units was the correct threshold for requiring a Transport Assessment and Travel Plan, and whether the size of the units had any bearing on this.

A Member suggested strengthening the wording in the first line of the policy to say that development proposals 'must' have a positive impact, rather than 'should', which was weaker.

Policy DM X: Freight and Servicing

A Member commented that point 1 should be more specific about when applicants should consult with the City of London Corporation. A Member added that the policy could go further and deal with logistics plans, and officers responded that they would look at this in relation to the previous policy. The Director of the Built Environment added that officers would look at the point on off-street servicing raised by a Member.

Policy DM X: Vehicle Parking

A Member stressed the importance of long-term strategy in this policy, to account for the increased use of taxi services such as Uber and the potential advent of autonomous vehicles.

A Member commented that existing public car parks should not be redeveloped or sold off, as they would be important going forward. There were a lot of uses for car parks as they provided a large amount of space and would be beneficial long-term. Some car parks were busy at the weekend as a result of the City's burgeoning night-time economy. Members were wary of the use of the term 'meanwhile uses' in point 3, and asked that officers look at this again.

Policy DM X: River Transport

In relation to point 3, Members recommended strengthening the wording by replacing 'should' with 'must'. The Director of the Built Environment confirmed the intention to reinstate river piers like that on Swan Lane.

A Member suggested widening the scope of the policy to encourage developers to use the river for transporting more than construction materials or waste. A Member added that the policy could look at how to protect use of the riverside, particularly to prevent conflicts with residents.

Policy DM X: Aviation Landing Facilities

The Director of the Built Environment confirmed that officers were looking at how the use of drones applied to the policy.

Core Strategic Policy XX: Walking, Cycling and Healthy Streets

The Director of the Built Environment advised Members that the policy reflected the Transport Strategy, and parts of the policy such as maps would slot into the Transport Strategy once it was agreed.

Policy DM X: Pedestrian Movement

A Member commented that the reference in point 1 to Barbican and London Wall needed to be updated.

Policy DMX: Active Travel including Cycling

Members suggested that the policy encourage offices to provide semi-public parking spaces, as this would provide public benefit. Whilst this was already set out in the explanation to the policy, it should be worked into the policy itself, at the design stage.

Core Strategic Policy CSXX: Thames Policy Area

The Director of the Built Environment advised Members that the policy was required as part of the London Plan. A Member commented that the wording of the policy was generally quite woolly and could be more specific.

In response to a query from a Member, the Director of the Built Environment advised that there was work to be done on the 'superblock' concept. This had not yet gone to committee but could be incorporated into the policy in the future.

Core Strategic Policy CSXX: Pool of London

The Chairman commented that he was keen to see regeneration in this area. Referring to points 1 and 5a, Members commented that the wording could be clearer and more specific.

A Member queried whether the policy would do what was intended, as it was not clear that it would. There were other things that could be considered but they would be more expensive. A Member added that Lower Upper Thames Street needed to be taken out of the policy.

Core Strategic Policy CSXX: Aldgate and Tower

A Member advised that the policy needed to be corrected, as Mansell Street was in Portsoken ward. The policy needed to address the air quality around Aldgate bus station, and subway rough sleepers, which had become a problem in the area. The underpass itself was closed, making the subway redundant and should be sealed off.

A Member added that Middlesex Street had significant car park facility which could be utilised. A Member commented that officers should work with the Tower of London to improve air quality around Aldgate bus station. A key part of the policy would be signposting, which needed improving in the area. The aim should be to visibly encourage people to walk into the City. Improving walkways and accessibility would also be important to this end. A Member also suggested that Tower Place needed livening up, and could be a good location to hold food markets.

Core Strategic Policy CSXX: City Cluster

A Member commented that point 4 was insufficiently bold and needed to go further as it was important to understand the significant increase in pedestrian numbers that would be coming. The Chairman added that when the towers in the Eastern Cluster were all built, if the area was not pedestrianised it would be a problem. The area would have the density of Manhattan but without the broad pavements, and this needed to be mitigated against.

The Director of the Built Environment responded that the policy would reflect the Transport Strategy. A Member stated that the policy needed to be able to adapt and change, as some places were already crowded, and suggested that the Corporation needed to be asking developers for amelioration measures. A Member added that the problem was cumulative impact.

The Chairman asked that officers think about the points raised, as the policy needed to ensure that the Corporation was not left with potential problems in the future.

Core Strategic Policy CSXX: Smithfield and Barbican Key Area of Change

A Member asked that the phrasing of the point relating to Golden Lane and Barbican pedestrian permeability be reconsidered, as it was slightly misleading. The strategy for Key Areas of Change should also address air quality issues. A Member suggested reconsidering the wording of the point on Beech Street Tunnel.

At this point, the Chairman left the meeting and the Deputy Chairman assumed the Chair.

Core Strategic Policy CSXX: Smithfield

Members commented that the main policy needed to be clear that this policy applied elsewhere and was not specific to Smithfield. A Member suggested mentioning the Centre of Excellence in the policy.

Core Strategic Policy CSXX: Moorgate-Liverpool Street

A Member said that they were pleased that this had been included. The policy should account for the full impact of Crossrail and would be a Key Area of Change. The policy needed to be conscious of Broadgate. Enhancing Petticoat Lane Market would also improve the whole of Middlesex Street, and this could be referenced in the policy for Aldgate and Tower.

The Deputy Chairman advised Members that the Sub-Committee would consider the finalised Local Plan at its meeting on 9 October 2018.

RESOLVED – That, subject to the feedback given by Members, the Sub-Committee agree the proposed draft policies set out at Appendices 1-4 of the report.

5. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions.

6. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no other business.

7. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No.

8 – 9

Exempt Paragraphs

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8. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions.

9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no additional, urgent items of business for consideration.

The meeting closed at 11:45am.

Chairman

Contact Officer: Chris Rumbles (Interim cover)
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LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE Tuesday, 9 October 2018

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Rooms - Committee Rooms on Tuesday, 9 October
2018 at 2.00 pm

Present

Members:

Christopher Hayward (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Randall Anderson
Mark Bostock
Marianne Fredericks
Dhruv Patel OBE

Officers:

Gemma Stokley	- Town Clerk's Department
Jennifer Ogunleye	- Media Officer
Adrian Roche	- Department of the Built Environment
John Harte	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Iain Simmons	- Department of the Built Environment
Jonathan Blathwayt	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment

1. APOLOGIES

Apologies for absence were received from Deputy Keith Bottomley.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AENDA

There were no declarations.

3. MINUTES

The public minutes and summary of the meeting held on 19 September 2018 were considered and approved as a correct record.

4. CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED DRAFT PLAN

The Sub-Committee considered a report of the Director of the Built Environment drawing attention to the main changes that have been made to the draft policies within the new Local Plan since they were originally considered by Members and seeking approval for the draft Plan in its entirety to go forward to the Grand Committee for consideration later this month.

Members were informed that a key diagram setting out all of the areas referred to within the Plan spatially would accompany the draft submitted to Grand Committee.

The Director of Built Environment proceeded to talk Members through each of the substantive changes as follows:

- **Strengthening of Policy Wording across the Plan**
The Director of the Built Environment reported that the tone of the Plan had been strengthened where appropriate with references to 'should' changed to 'must' and 'could' to 'should' throughout.
- **Alignment with new Corporate Plan**
The draft vision and strategic objectives had been updated to dovetail more effectively with the Corporate Plan. A Member requested that Officers check that any figures quoted within the two Plans were consistent across these and various other relevant policies.
- **Noise and Light Pollution Policy**
Officers reported that, in response to comments previously made by the Sub-Committee, the Noise and Light Pollution Policy had been amended to cover both aspects adequately. In response to a Member who questioned if the Plan was clear enough in terms of what would be taken into account on daylight and sunlight, the Director of the Built Environment reported that this had been worked in to the design policies and highlighted that ideal daylight and sunlight conditions may not be practical in densely-developed city centre locations.
- **Protecting Social, Community and Sporting Facilities in situ**
The Director of Built Environment reported that a cascade approach was to be adopted whereby the start point would be to protect the existing use of such a facility before considering (and giving preference to) a similar use and then only considering alternative uses if this was not possible.

A Member questioned if social rent for some units could be taken in to account. Officers undertook to look further in to the affordability and cost implications of this and to look to reflect this aspiration in so far as possible going forward.
- **Collective Security Measures for Major Developments**
Officers highlighted that the suggested approach to security was a collaborative one with security features for individual buildings being a last approach.
- **On-Site Affordable Housing**
Officers highlighted that the policy emphasised the need for affordable housing to be provided on-site and only exceptionally off-site. This was in line with concerns raised previously by Members and was also

consistent with the message in both the National Planning Policy Framework and London Plan.

A Member referred to the discussion that had taken place around this at the last meeting of the Sub-Committee and the possibility of changing the relevant Supplementary Planning Document (SPD). Officers reported that they had discussed this matter further with colleagues in Community and Children's Services and any changes to the SPD would require public consultation. Members suggested that this process should be instigated sooner rather than later.

A Member requested that points 2. a. and b. of the Housing Policy be put in bold type.

- **Review of existing Residential Areas**

Maps of existing residential areas depicting housing units that were either completed or in the pipeline were tabled for discussion. Members asked that the number of units in each area be clearly highlighted within the map key and that the types of housing were also specified.

In response to questions, Officers highlighted that the 'pink' areas depicted existing residential clusters and that the 'blue' areas were suggestions of other areas which it might be suitable to include subject to the views of Members.

Members were firmly of the view that the areas in which residential development was encouraged should be clearly identified and kept to a minimum.

In response to further questions, the Director of the Built Environment confirmed that residential amenity was already protected within existing policies. The Deputy Chairman asked that it be made explicit that, whilst housing may be outside of these specified zones, residential amenity would still be safeguarded. Officers undertook to verify this.

- **Proposed Phasing Profile to the increase in Office Stock**

Officers reported that it would be made clear in the Policy that this was 'indicative' phasing. Members were informed that the increase of 750,000 square metres referred to for 2016-2021 was largely made up of schemes that were already in the pipeline.

- **Principal Shopping Centres**

Members were informed that the Policy had been amended to encourage more diversity in terms of the retail offer and unit sizes/frontage.

In response to a question, it was reported that an impact assessment would be necessary if several units were amalgamated above a certain floorspace.

- **Specialist Retail Uses and Markets**
Members were informed that these were now treated as separate issues and sub-divided into separate policies.
- **Pedestrian Routes through Buildings and Development Sites**
Officers reported that the Policy now clarified the need to seek to provide new pedestrian routes through buildings and development sites as well as protecting existing routes. This also 'reads across' well to the draft Transport Strategy.

The Deputy Chairman highlighted the need to link both this and the New Development Policy within the Plan. He referred to the point raised by a Member at Grand Committee earlier this week stating that any new development should look to enhance or at least consider how any building becomes part of the public realm. A Member spoke about the possibility of providing developers with a non-exclusive list of things that it was felt would benefit the City and would therefore be in their interests to include (for example, public viewing galleries). Another Member clarified that the point made at Grand Committee had been more specifically around the provision of more publicly accessible ground floor space by developers.

The Deputy Chairman added that consideration should also be given to the metrics of how an assessment impact of a new development might be undertaken and what the expectations around mitigation then were.

Officers undertook to look at how they might strengthen the Policy along these lines.

- **On-Site Servicing Provision**
Greater emphasis had been placed on the need for on-site servicing provision within development schemes.

Members suggested that paragraph 3 of the policy be amended to replace 'Developments should...' with 'Developments *must*'.

The Deputy Chairman spoke on paragraph 2 of the Policy and freight consolidation. He added that this was something that would be a huge change going forward and that developers could therefore be asked, in the interim, to produce Transport Management Plans with reference to this in recognition of the proposed shift towards this approach and to ensure that it remained a live issue. The Chairman concurred with this point and suggested that, going forward, there would be a presumption in favour of consolidation.

A Member suggested that paragraph 1 of the Policy be amended to read 'Applicants are required to consult with the City Corporation *and agree* all matters relating to servicing at an early design concept stage'. She went on to state that, where deliveries on site were necessary, there

should be strict conditions around these and this should be flagged with developers at the very outset.

- **Alignment with the draft Transport Strategy**

Language within the plan would be amended to remove reference to 'super blocks' and replace with reference to healthy planned street areas.

A Member went on to discuss outside spaces more generally, with reference to tables and chairs on public highways and drinking in the street which could prove costly in terms of cleansing and maintenance. She questioned how Officers could look to ensure that developers were not looking to utilise public highways for this purpose going forward. She referred to Westminster City Council who had a policy in terms of tables and chairs and required separate trading licences for these.

The Chairman reiterated this point and questioned how this might be tackled in design terms. He wanted to be clear that any widening of pavements, for example, was for safety purposes and should not be viewed as additional space for developers. The Director of the Built Environment stated that the Local Plan did not deal with public highways but that this led back to previous issues raised around pedestrian permeability. It was suggested that reference to these points might usefully be included within the policy on 'Advertisements'.

Another Member suggested that, if these kinds of issues could be predicted from the use of the Unit, developers could be asked to contribute financially to pavement improvements/cleansing going forward. Officers stated that further views could be sought around this at consultation.

- **Use of the River Thames**

Members were informed that there was now a stronger policy requirement for developers to consider the use of the River Thames for the movement of construction materials and waste and the servicing of development.

The Deputy Chairman suggested that this might be strengthened further still by suggesting that the River also be used more generally for deliveries and the like going forward.

- **Facilities for Public Cycle Parking**

Officers highlighted that paragraph 1 of the Cycle Parking policy had been amended to require developments to provide on-site cycle parking for both occupiers, visitors and, where feasible, the general public.

A Member stated that, in terms of future-proofing such provisions, developers needed to be aware that e-bikes required Wi-Fi signal access and so either Wi-Fi access needed to be improved in certain

areas or additional thought would need to be given to the placement of cycle parking in basements, for example.

Members requested that the wording 'where feasible' be removed from paragraph 1 to strengthen the requirements around public cycle parking.

- **Potential Public Facilities within Tall Buildings**

Members requested that 'must' replace 'should' in paragraph 4 of the Policy.

In response to questions, Officers stated that they were in discussion with the GLA to ensure that this Policy aligned with the London Plan around the need for more publicly accessible spaces.

- **Key Areas of Change**

Maps of the individual key areas were tabled at the meeting.

Pool of London

In response to a question around whether there would be more public toilets provided along the Riverside Walkway, Officers clarified that the onus would be on new developments to provide public access to toilets, water and defibrillators within buildings.

Aldgate and Tower

A Member asked that Portsoken also be included in this Key Area.

Smithfield and Barbican

A Member referred to the 'Smithfield and Barbican Key Area of Change' policy wording and highlighted sensitivity around the suggestion that pedestrian permeability and connectivity through the Barbican Estate might be anywhere other than the existing highwalks. Officers noted this viewpoint but suggested that, at planning stage, it would be their preference to keep options around permeability and connectivity open and to seek specific views around this at consultation.

A Member commented that they felt that Officers had produced a good contextual write up of each Key Area of Change. He went on to state that the area linking Liverpool Street and the Smithfield/Barbican Area would become increasingly important going forward with the introduction of Crossrail and the Cultural Mile, marking an important shift in City Policy, He was therefore keen that reference to this should feature throughout the relevant documents.

Members went on to raise questions around other aspects of the draft Plan. With regard to the 'Air Quality' policy, a Member questioned if it would be better to install the best available technology as opposed to being quite specific around 'biomass or biofuel boilers'.

With regard to the 'Pipe Subways' policy, a Member questioned what thought could be given to the future proofing of infrastructure such as this.

With reference to the 'Housing' policy a Member questioned whether there would be any circumstances whereby a proposal for a scheme offering 100% intermediate housing would be acceptable. Officers reported that this would be considered on a case by case basis and highlighted that there would be new Government requirements around this coming forward. It was generally accepted that if such a proposal were to meet priority need in the City, it would be acceptable despite the 70%/30% reference in paragraph 2.c.

A Member commented that he felt that any reference to area viability was lacking in the Plan. Officers confirmed that the whole Plan would be subject to viability assessment after consultation. The Member asked that this be referred to within the draft Plan.

Officers concluded by stating that the draft Plan would now be submitted to the Planning and Transportation Committee for approval later this month before going out for public consultation, the results of which would be reported to this Sub-Committee in Spring 2019.

RESOLVED – That, Members agree the proposed draft Local Plan set out at Appendix 1 and authorise the Director of the Built Environment to make further minor editorial changes and non-material additions to the draft Plan prior to its consideration by the Planning and Transportation Committee.

5. **DRAFT CITY OF LONDON TRANSPORT STRATEGY**

The Sub-Committee considered a report of the Director of the Built Environment detailing the draft City of London Transport Strategy.

The Chairman questioned the use of the word 'delight' within the visions, aims and outcomes text. Officers reported that this had been well received at initial consultation and it was therefore felt that this was appropriate. Officers reported that reference to 'super blocks' had also been removed from this document following initial comments received and to make it consistent with the Local Plan in this respect.

A Member commented that passing a resolution to shift from 20 to 15mph may prove challenging and he therefore asked for the justification behind this given that it was likely to be one of the Strategy's hottest topics. Officers reported that they wanted this document to make a difference. Evidence showed that the likelihood of fatal collisions was much diminished at 15 versus 20mph.

The Sub-Committee recognised that, whilst this shift would be perceived as radical and had not been adopted elsewhere in London to date, there was no reason that the City should not lead on this initiative, particularly when keeping in mind the Mayor of London's aspirations around 'Vision Zero'. Officers went on to highlight that the City was a totally unique area of London, particularly given the amount of pedestrian footfall in the square mile which was only set to increase in future years.

The Chairman praised the Strategy for being bold and innovative in an attempt to incite real change. In response to questions, Officers reported that, aside from the 15mph proposals, issues around pedestrian priority at certain times, a 50% reduction in peak time deliveries and cycling may also incite debate.

In response to questions, Officers reported that the proposals within the draft document largely aligned with or were slightly ahead of those within the Mayor of London's Transport Strategy. The Deputy Chairman added that there was also full alignment with TfL who liked what the City were doing in this area and seemed to be on board with the proposals.

With regard to commentary on step free access at underground stations, it was reported that the ambition was for all stations to be step free by 2044 which was in line with the Mayor's Strategy.

The Director of the Built Environment reported that this was the City's first Transport Strategy. It was Officers' and Members' genuine belief that it was an exciting, refreshing and useful document where the sum was a coherent, forward thinking plan intended to be greater than any of the individual issues within it. The Deputy Chairman added that, throughout the process of shaping this document, accessibility for all users of the space had been key and the draft Strategy was very inclusive in this regard.

RESOLVED – That, Members of the Local Plan Sub-Committee approve the draft Transport Strategy for final presentation to the Planning and Transportation Committee on 30 October 2018.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no additional, urgent items of business for consideration.

8. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item No.

Exempt Paragraph(s)

9-10

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9. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions raised in the non-public session.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

The Chairman informed the Sub-Committee about media interest around the draft Local Plan and Transport Strategy.

The meeting ended at 3.56 pm

Chairman

Contact Officer: Gemma Stokley
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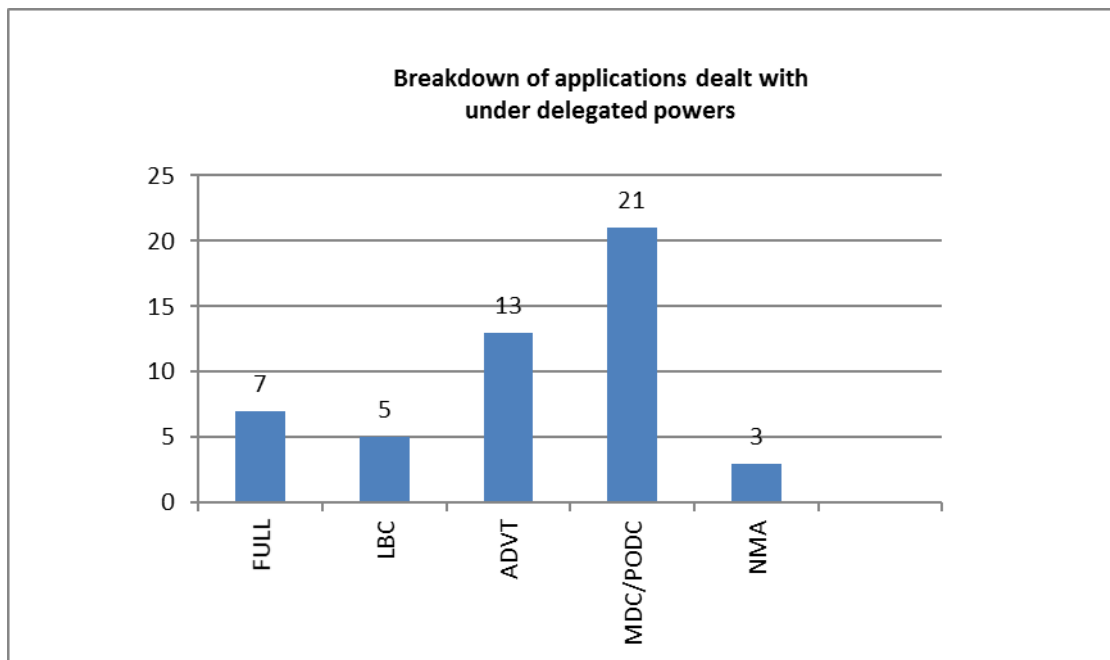
Committee(s)	Dated:
Planning and Transportation	30th October 2018
Subject: Delegated decisions of the Chief Planning Officer and Development Director	Public
Report of: Chief Planning Officer and Development Director	For Information

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee, Forty-Nine(49) matters have been dealt with under delegated powers.

Twenty-one(21) relate to conditions of previously approved schemes, five (5) relate to works to listed buildings. Thirteen (13) express consent to display advertisements were decided of which three (3) were refused, three (3) Non-Material amendment applications. Seven (7) applications for development have been approved including one (1) change of use



Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision
17/01178/MDC Bread Street	2 - 6 Cannon Street London EC4M 6YH	Submission of details pursuant to the following condition of planning permission 14/00780/FULMAJ dated 30.07.15: 9(b) details of the proposed new facade(s) including typical details of the fenestration and entrances. 9(e) details of ground floor elevations. 9(f) details of windows. 9(h) details of soffits, hand rails and balustrades. 9(i) details of the integration of cleaning equipment, cradles and the garaging thereof.	Approved 11.10.2018
17/01249/MDC Bread Street	St Paul's Cathedral School 2 New Change London EC4M 9AD	Details of windows and metal screens, soffits, handrails and balustrades, alterations to the existing façade, junctions with the existing buildings, boiler flues, external ventilation grilles, landscaping, new opening(s) in St. Augustine's Tower, cycle parking and air filtration report pursuant to conditions 11b, c, d, e, f, g, h, i, 12, 13, 15 and 16 of planning permission dated 08 December 2016 (ref: 16/00850/FULL).	Approved 04.10.2018
18/00124/FULL Farringdon Within	15 Old Bailey London EC4M 7EF	Change of use from offices (Class B1), retail (Class A1 and A3) and betting shop (Sui Generis use) to a hotel (Class C1, 93 bedrooms) with ancillary bar/restaurant and back of house functions at basement and ground floor level, the infilling of the lightwell on Green Arbour Court, insertion of a	Approved 27.09.2018

		mezzanine level and associated elevational alterations including the provision of a roof terrace (384sq.m floor area increase).	
18/00125/LBC Farringdon Within	15 Old Bailey London EC4M 7EF	Internal and external alterations including: reconfiguration of internal layouts, the insertion of a mezzanine level, the infilling of the lightwell on Green Arbour Court and the provision of a roof terrace (384sq.m floor area increase).	Approved 27.09.2018
18/00137/FULL Farringdon Within	16 Old Bailey London EC4M 7EG	Refurbishment and extension works comprising: Erection of a two storey roof extension (1,417sq.m GEA) plus plant room for office use (Class B1) with the associated formation of new terrace areas, infilling of an atrium (755sq.m GEA) and external alterations to the Fleet Place facade including the introduction of greening, alterations to the ground floor of the Old Bailey facade including the insertion of new doors and windows, provision of additional cycle parking and other works incidental to the development.	Approved 08.10.2018
18/00362/LDC Bread Street	St Paul's Cathedral School 2 New Change London EC4M 9AD	Details of windows and metal screens, soffits, handrails and balustrades, alterations to the existing façade, junctions with the existing buildings, boiler flues, external ventilation grilles, landscaping and new staircase within St Augustine Tower pursuant to condition 3b, c, d, e, f, g, h, i and j of listed building consent dated 08 December 2016 (ref: 16/00851/LBC).	Approved 04.10.2018
18/00495/LBC Coleman Street	88 - 92 Moorgate London EC2M 6SE	Installation of a non-illuminated projecting sign; replacement of existing signs with non-illuminated fascia panels and two non-	Approved 27.09.2018

		illuminated door plaques.	
18/00625/FULL Farringdon Without	St Dunstan In-The- West Fleet Street London EC4A 2HR	Alterations to rear wall and window to create a door onto private courtyard.	Approved 16.10.2018
18/00665/LDC Bishopsgate	Andaz Hotel 40 Liverpool Street London EC2M 7QN	Submission of detailed paint analysis pursuant to condition 2 of Listed Building Consent dated 31 May 2018 (ref: 18/00170/LBC).	Approved 27.09.2018
18/00675/ADVT Cordwainer	The Pavilion End Public House 23 Watling Street London EC4M 9BR	Installation and display of two externally illuminated fascia signs each measuring 0.4m high by 1.4m wide situated at a height above ground of 4.5m and one externally illuminated projecting sign measuring 1m high by 0.8m wide situated at a height above ground of 3m.	Approved 11.10.2018
18/00723/ADVT Queenhithe	Samuel Pepys Public House Stew Lane London EC4V 3PT	Installation and display of one internally illuminated panel sign measuring 0.45m in height by 5.97m in width situated at a height of 2.7m above ground level.	Approved 04.10.2018
18/00728/POD C Tower	Walsingham House 35 Seething Lane London EC3N 4AH	Submission of an Interim Travel Plan and a Delivery and Servicing Management Plan pursuant to Schedule 3 Clause 7.1 and 8.1 of the Section 106 Agreement dated 08 January 2016 in relation to Planning Permission Ref: 14/01226/FULMAJ.	Approved 04.10.2018
18/00735/MDC Aldgate	52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House) London, EC3	Details of levelling and drainage pursuant to condition 25 of planning permission dated 30/06/2014 (app. no. 14/00027/FULMAJ).	Approved 11.10.2018

18/00754/ADVT Farringdon Without	Bus Stop Outside 333 Central Markets Farringdon Street London EC1A 9NB	Installation and display of an internally illuminated advertisement display panel measuring 1.33m wide by 2.37m high by a bus shelter on the west side of Central Markets.	Refused 26.09.2018
18/00755/ADVT Farringdon Within	Bus Stop Outside 83 Farringdon Street London EC4A 4BL	Installation and display of an internally illuminated advertisement display panel measuring 1.33m wide by 2.37m high by a bus shelter on the pavement outside of 83 Farringdon Street.	Refused 26.09.2018
18/00756/ADVT Farringdon Without	Bus Stop Outside Atlantic House 60 Shoe Lane London EC4A 3LW	Installation and display of an internally illuminated advertisement display panel measuring 1.33m wide by 2.37m high by a bus shelter on the Farringdon Street pavement east of Atlantic House.	Refused 26.09.2018
18/00761/MDC Coleman Street	56-60 Moorgate, 62- 64 Moorgate & 41- 42 London Wall London EC2	Details of sewers vents and site contamination pursuant to conditions 19 and 24 of planning permission 15/01312/FULMAJ dated 14th February 2017.	Approved 11.10.2018
18/00771/FULL Portsoken	95 Middlesex Street London E1 7DA	Installation of a new shopfront.	Approved 05.10.2018
18/00780/ADVT Langbourn	124 Fenchurch Street London EC3M 5AL	Installation and display of one internally illuminated projecting sign measuring 0.5m high by 0.5m wide situated at a height above ground of 4.1m.	Approved 11.10.2018
18/00786/MDC Coleman Street	120 Moorgate London EC2M 6UR	Submission of a survey of the highway and other land at the perimeter of the site pursuant to condition 6 of planning permission dated 31st May 2018 (18/00145/FULL).	Approved 27.09.2018
18/00799/MDC Coleman Street	120 Moorgate London EC2M 6UR	Submission of a Deconstruction Logistics Plan, Construction Logistics Plan and a scheme for the	Approved 11.10.2018

		protecting nearby neighbours from noise, dust and other environmental effects pursuant to conditions 2, 3 and 4 of planning permission dated 31st May 2018 (18/00145/FULL).	
18/00802/MDC Tower	Ibex House 42 - 47 Minories London EC3N 1DY	Submission of a noise report pursuant to condition 3 of planning permission dated 09/11/2017 (app. no. 17/00680/FULL).	Approved 28.09.2018
18/00804/MDC Coleman Street	51 Moorgate London EC2R 6BH	Details of and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces; details and a sample of decorative metal spandrel panels and treatment of entrance portals to Coleman Street Buildings; pursuant to condition 5 (a)(part) and (c)(part) of planning permission 16/00463/FULL dated 26/7/2016.	Approved 27.09.2018
18/00806/ADVT Vintry	72 Upper Thames Street London EC4R 3TA	Installation and display of i) one internally illuminated fascia sign measuring 0.48m in height by 1.241m in width situated at a height of 3.12m above ground level; and ii) two internally illuminated projecting signs measuring 0.514m in height by 1.041m in width situated at a height of 1.255m above ground level.	Approved 27.09.2018
18/00814/MDC Farringdon Without	1 & 2 Garden Court Middle Temple London EC4Y 9BL	Submission of details of a scheme for the protection of nearby residents and commercial occupiers pursuant to condition 4 of planning permission dated 27.06.2018 (ref: 17/00937/FULL).	Approved 16.10.2018
18/00815/MDC Langbourn	Land Bounded By Fenchurch Street, Fen Court, Fenchurch Avenue & Billiter Street (120	Submission of details of retail unit 1 (at ground floor and basement level 2) showing the Class of the retail use pursuant to condition 28	Approved 16.10.2018

	Fenchurch Street) London EC3	(partial discharge) of planning permission dated 08/02/2016 ref: 14/00237/FULMAJ.	
18/00819/MDC Castle Baynard	The Old Deanery Dean's Court London EC4V 5AA	Submission of a Written Scheme of Investigation, details of the foundations and all groundworks; to include a detailed design and method statement; details and specification of the proposed platform lift including; the design and location of the call button and mounting post; details of the electric car charging point associated cable runs pursuant to conditions 2, 3, 4 (d), (e), (g), (h) and (i) respectively of planning permission dated 1st March 2018 (17/01218/FULL).	Approved 11.10.2018
18/00823/MDC Billingsgate	51 Eastcheap London EC3M 1JA	Submission of details of the proposed new facades, ground floor elevations, typical bays, soffits, hand rails and balustrades, and materials to be used on external faces of the building, pursuant to condition 4 (a), (b), (c), (d) and (e) of planning permission dated 15/03/2018 (app. no. 17/01221/FULL).	Approved 27.09.2018
18/00825/LBC Aldersgate	161 Shakespeare Tower Barbican London EC2Y 8DR	Replacement of all sliding walls with non-structural internal walls and built in shelves. Replacement of all doors with full height doors.	Approved 02.10.2018
18/00827/MDC Walbrook	15 - 17 St Swithin's Lane London EC4N 8AL	Submission of a Hotel Accessibility Management Plan pursuant to condition 34 of planning permission dated 24 April 2015 (14/00658/FULMAJ).	Approved 02.10.2018
18/00828/MDC Portsoken	Mitre Square London EC3A 5DE	Installation of restored blue ceramic plaque on the wall bounding the east of Mitre Square pursuant to condition 9 (in part) of planning permission 13/01082/FULMAJ	Approved 11.10.2018

		dated 09.06.14.	
18/00829/MDC Portsoken	St Botolph Aldgate Church Yard Aldgate High Street London EC3N 1AB	Details of lanterns, external lighting and seating design pursuant to Condition 3 of planning permission 16/00186/FULL dated 12.07.2016	Approved 02.10.2018
18/00835/ADVT Coleman Street	51 Moorgate London EC2R 6BH	Installation and display of i) one non-illuminated hoarding advertisement measuring 2.6m high by 39.6m wide and ii) one non-illuminated hoarding advertisement measuring 2.6m high by 13.4m wide.	Approved 04.10.2018
18/00838/LDC Castle Baynard	The Old Deanery Dean's Court London EC4V 5AA	Submission of a Written Scheme of Investigation, details of the foundations and all groundworks; to include a detailed design and method statement; details and specification of the proposed platform lift including; the design and location of the call button and mounting post; details of the electric car charging point associated cable runs pursuant to conditions 2, 3, 4 (d), (e), (g), (h) and (i) respectively of listed building consent dated 1st March 2018 (17/01219/LBC).	Approved 11.10.2018
18/00840/ADVT Cripplegate	Bernard Morgan House 43 Golden Lane London EC1Y 0RS	Installation and display of: i) one non-illuminated fascia sign measuring 1m in height by 3.8m in width situated at a height of 3.3m above ground level; ii) one non-illuminated fascia sign measuring 1m in height by 2.1m in width situated at a height of 3.1m above ground level; iii) one internally illuminated fascia sign measuring 1m in height by 2m in width situated at a height of 2.8m above ground level; iv) one internally illuminated fascia sign measuring 1m in height by 3m	Approved 02.10.2018

		in width situated at a height of 2.8m above ground level; and v) two internally illuminated fascia signs each measuring 1m in height by 2m in width situated at a height of 2.9m above ground level.	
18/00845/FULL Farringdon Without	Atlantic House 50 Holborn Viaduct London EC1A 2FG	Installation of six new external lights.	Approved 04.10.2018
18/00846/ADVT Cordwainer	1 Poultry London EC2R 8EJ	Installation and display of (i) three non-illuminated banner flags measuring 3m high by 0.78m wide at a height above ground of 6.53m.	Approved 12.10.2018
18/00852/ADVT Bishopsgate	15 - 16 St Helen's Place London EC3A 6DE	Installation and display of a set of internally illuminated letters measuring 0.32m in height x 3m in width situated at a height of 1.94m above ground level.	Approved 09.10.2018
18/00857/MDC Castle Baynard	5 Pemberton Row London EC4A 3BA	Details of facilities and methods to accommodate construction vehicles and deliveries during demolition and the construction of the building pursuant to condition 2 of planning permission 14/00933/FULL dated 22.10.15.	Approved 12.10.2018
18/00858/FULL Tower	3 America Square London EC3N 2LR	Retention of nine short-term lets (less than 90 consecutive nights) (Class C3) in lieu of nine permanent residential units (Class C3).	Approved 27.09.2018
18/00862/NMA Bishopsgate	The Crosspoint 34 - 37 Liverpool Street London EC2M 7PP	Non-material amendment under Section 96a of the Town and Country Planning Act 1990 (as amended) to planning permission 17/00041/FULL dated 9th March 2017 to allow amendments to the entrance doors on the Liverpool Street facade.	Approved 04.10.2018
18/00863/MDC Lime Street	22 - 24 Bishopsgate London EC2N 4BQ	Details of plant and ductwork to serve kitchens ancillary to the Class B1 offices pursuant	Approved 27.09.2018

		to Condition 16 (m) (in part) of planning permission 16/00849/FULEIA dated 11.09.2017.	
18/00871/ADVT Cripplegate	43 Golden Lane London EC1Y 0RS	Retention of two non-illuminated sign boards on a crane each measuring 1m in height by 2.4m in width situated at a height of 34m above ground level.	Approved 27.09.2018
18/00874/FULL Aldgate	22A Bevis Marks London EC3A 7JB	Alteration to shopfront comprising the replacement of glazed panel with an air intake grill.	Approved 16.10.2018
18/00887/LBC Cripplegate	163 Andrewes House Barbican London EC2Y 8BA	Removal of an internal sliding door between the study and the living room.	Approved 11.10.2018
18/00896/NMA Tower	All Hallows By The Tower Byward Street London EC3R 5BJ	Non-material amendment under Section 96A of the Town and Country Planning Act to planning permission dated 24 July 2018 (18/00481/FULL) to vary condition 2 to change the colour of the air conditioning unit.	Approved 12.10.2018
18/00900/FULL Walbrook	6 Lombard Street London EC3V 9AA	Upgrade to existing rooftop base station and ancillary equipment.	Approved 16.10.2018
18/00901/LBC Walbrook	6 Lombard Street London EC3V 9AA	Upgrade to existing rooftop base station and ancillary equipment.	Approved 16.10.2018
18/00993/ADVT Tower	Fitness Centre 1 America Square London EC3N 2LB	Installation and display of; i) one internally illuminated fascia sign measuring 2m high by 0.93m wide located at a height of 2m above ground floor level and ii) one non-illuminated advertisement measuring 0.3m high by 0.93m wide located at a height of 1m above ground floor level.	Approved 16.10.2018

<p>18/00998/NMA Billingsgate</p>	<p>51 Eastcheap London EC3M 1JA</p>	<p>Non-material amendment under section 96a of the Town and Country Planning Act 1990 (as amended) to planning permission dated 15/03/2018 (app. no. 17/01221/FULL) to vary the wording of condition 15 (approved plans) to allow minor alterations to the curtain walling of the terrace lobby at level 9.</p>	<p>Approved 16.10.2018</p>
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Agenda Item 6

Committee(s)	Dated:
Planning and Transportation	30 th October 2018
Subject: Valid planning applications received by Department of the Built Environment	Public
Report of: Chief Planning Officer and Development Director	For Information

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Valid Applications

Application Number & Ward	Address	Proposal	Date of Validation
18/00797/FULL Aldgate	113 Leadenhall Street, London, EC3A 4AX	New internal platform lift, internal steps and associated works including the removal of the external entrance steps and provision of a new entrance door.	14/09/2018
18/00976/FULL Aldgate	Outside 69 Leadenhall Street, London, EC3A 2BG	Repairs and cleaning of external masonry of the pump, addition of a lantern and reinstatement of a running water with new water bottle holder.	18/09/2018
18/01008/FULL Aldgate	52 Lime Street, London, EC3M 7BS	Erection of a sculpture and associated plinth.	25/09/2018
18/00964/FULL Billingsgate	51 Eastcheap, London, EC3M 1JA	Minor alterations to window arrangements comprising the introduction of openings in the glazing through the addition of a central mullion to facilitate maintenance access.	14/09/2018
18/01000/FULL Bishopsgate	Footbridge Over Wormwood Street, City Walkway - Over Wormwood Street, London, EC2	Application under section 73 of the Town and Country Planning Act 1990 to vary condition 1 of planning permission 17/01091/FULLR3 to extend the temporary time period for the retention of the sculpture 'Bridging	21/09/2018

		Home' by Do Ho Suh to 31 March 2020.	
18/01049/FULL Bread Street	Scandinavian House, 2 - 6 Cannon Street, London, EC4M 6YH	Alterations to ground floor facade comprising installation of revolving door, side pass door and formation of new access onto Distaff Lane. Installation of CCTV cameras and application of Vinyl Transfer to the Fourth / Fifth floor windows fronting Distaff Lane.	04/10/2018
18/00811/FULL Bridge And Bridge Without	4 Lovat Lane, London, EC3R 8DT	External alterations including: (i) replacement of existing windows with double hung sash windows; (ii) replacement of existing door surround, steps and entrance doors; (iii) reinstatement of fascia detail above the ground floor windows; (iv) reinstatement of a hanging sign at first floor level incorporating a timepiece; (v) replacement of the existing rooftop plantroom with a new rooftop pavilion and amenity terrace; and (vi) installation of two condenser units to the rear lightwell at roof level.	30/08/2018
18/01051/FULLR3 Broad Street	2 - 14 Liverpool Street, London, EC2	Installation of sculpture 'Infinite Accumulation' by Yayoi Kusama in association with the Crossrail Art Foundation.	04/10/2018
18/00914/FULL Candlewick	Sherborne House, 119 - 121 Cannon Street, London, EC4N 5AT	Installation of a dormer extension at sixth floor level and extension of an existing lift shaft.	17/09/2018
18/00992/FULL Castle Baynard	22 Tudor Street, London, EC4Y 0AY	Minor alterations including replacement of external windows at ground floor level and refurbishment of main entrance and associated works.	20/09/2018
18/01004/FULL Castle Baynard	66-73 Shoe Lane, London, EC4A 3BQ	Demolition of 8th floor and new 8th and 9th floor roof extension to the west wing building to provide 537sq.m of new Class B1 (a) office space; new render finish to north elevation; re-landscaping to existing roof terrace; new roof plant and associated works.	24/09/2018
18/01043/FULL Castle Baynard	111 Fleet Street, London, EC4A 2AB	Alterations to shopfront comprising redecoration and replacement of cladding.	02/10/2018
18/01027/FULLR3	8 Moorfields,	Installation of a sculpture 'Manifold'	01/10/2018

Coleman Street	London, EC2Y 9AA	by Conrad Shawcross in association with the Crossrail Art Foundation.	
18/01036/FULL Cordwainer	3 Queen Victoria Street, London, EC4N 4TQ	Alterations to ground floor façade to include the removal of two outer single leaf swing doors to accommodate the installation of one new revolving door.	01/10/2018
18/01025/FULLR3 Cornhill	Royal Exchange, Cornhill, London, EC3V 3NL	Application under Section 73a of the Town and Country Planning Act 1990 (as amended) to amend condition 5 of planning permission dated 9th October 2012 (12/00451/LBC) to allow the trough to be relocated to a new position within an amended timescale.	01/10/2018
18/00841/FULL Farringdon Within	9 Newbury Street, London, EC1A 7HU	Alterations and extension to the existing office building (Use Class B1) including: (i) rear extension at ground to third floor levels; (ii) single storey roof extension and associated terrace at fourth floor level (total increase in floorspace: 48sq.m).	25/09/2018
18/01017/FULL Farringdon Within	Fleet Place House, 2 Fleet Place, London, EC4M 7RF	Removal of two panels of aluminium cladding and the installation of one louvre vent to the East side of the West core of the building between 2nd and 3rd floor level.	28/09/2018
18/00913/FULL Farringdon Without	28 Chancery Lane, London, WC2A 1LB	Alterations to the existing shopfront, including the installation of: (i) new double entrance doors to Chancery Lane; (ii) louvre transom panels to the existing fascia panels to Chancery Lane and Breams Buildings; and (iii) two retractable canvas awnings to Chancery Lane.	12/09/2018
18/00970/FULMAJ Langbourn	25 - 26 Lime Street, London, EC3	Demolition of two existing buildings (with the exception of the front facade at levels 1-3 of no. 24 Lime Street) and erection of a new building comprising basement, ground and seven upper storeys for office use (Class B1) [2,420sq.m GEA] at all levels and retail use (Class A1-A3) [533sq.m GEA] at basement and ground	14/09/2018

		floor levels. Creation of terraces, provision of cycle parking, refuse and recycling storage, ancillary plant and all associated works. [Total 2,953sq.m GEA].	
18/01006/FULL Queenhithe	City Of London School , 107 Queen Victoria Street, London, EC4V 3AL	Replacement of existing 0.85m high roof level metal balustrading with new 1.82m high galvanised steel security fencing to the technology block at second floor roof level.	25/09/2018
18/00987/FULL Tower	The Chamberlain Hotel, 130 - 135 Minories, London, EC3N 1NU	External alterations comprising: (i) replacement of existing windows and timber stallrisers with new timber framed windows; (ii) installation of new glazing above main entrance; (iii) recladding of entrance canopy; (iv) replacement of tiling at east and south entrances; (v) replacement of rear door with solid timber door and fanlight; and (vi) installation of a glazed door and windows on the south west elevation.	18/09/2018
18/00934/FULL Vintry	50 Cannon Street, London, EC4N 6JJ	Installation of eight condensers.	01/10/2018

Committee(s):	Date(s):	Item no.
Children and Community Services Education Board Policy and Resources Planning and Transportation	12 October 2018 8 November 2018 15 November 2018 30 October 2018	
Subject: Land Transactions - Former Richard Cloudesley School Site		Public
Report of: Town Clerk		For Decision
<u>Summary</u>		
<p>This report considers changes to the land transaction arrangements previously authorised by your Committees in order to ensure the land is held appropriately and to remove the risk of the scheme being impeded by injunction due to Right of Light infringements resulting from the scheme. The changes are identified in the report. The criteria for adopting the changed arrangements are evaluated and the report advises that the criteria are met. It is recommended that the resolutions in Recommendations 1,3 & 4 be reaffirmed on the basis of the changed arrangements outlined in the report, that the resolution in Recommendation 2 be agreed in the amended form shown below, and that the new Recommendation 5 be agreed to address the interests of affected rights holders.</p>		
Recommendations		
<ol style="list-style-type: none"> 1. That Policy and Resources Committee authorise the acquisition of the freehold title in the LBI Land for the purpose of a new primary Academy and social housing, with workshops to be located beneath part of the social housing in accordance with the powers set out in this report. 2. That Planning and Transportation Committee authorise the appropriation of the City's Land from housing purposes to purposes 3. That Policy and Resources Committee and Education Board authorise the grant of a leasehold interest of all the LBI Land and City Land on which the school is to be constructed to the City of London Academies Trust 4. That, in relation to functions within their respective Terms of Reference, Policy and Resources Committee, Community and Children's Services Committee and Education Board authorise the Director of Community and Children's Services to conclude negotiations and final terms of the acquisitions and disposal in accordance with the principles set out in this 		

report, to take any other steps as required in connection with any related documentation and associated transactions as may be necessary to complete the steps at recommendations 1 to 3 and to implement the Development in accordance with the principles in this report, and to instruct the City Solicitor to enter into all necessary legal documents.

5. That **Community and Children's Services Committee** instructs the Rights of Light advisers acting for the City as developer of the site to proactively approach affected rights holders to offer appropriate compensation for release of their rights of light on the basis in paragraph 14 of Appendix 1 of this report.

Main Report

Background

1. The principle of developing the former Richard Cloudesley School Site, ("RCS") and adjacent areas of the Golden Lane Estate ("GLE") (together, "the Site") for a new school and social housing ("the Scheme") has been agreed by relevant Committees. The Site is made up of the RCS which is in the London Borough of Islington's ("LBI's") freehold ownership ("the LBI Land"), and adjacent garages, adult education centre, and adjoining land that forms part of the GLE which are in the City's ownership ("the City's Land") (and which Community and Children's Services Committee has resolved is no longer required for housing purposes).
2. Planning permission for the Scheme was granted by both local planning authorities in whose area the Site is located (LBI and the City) on 19 July 2018. Workspace was required to be provided by LBI underneath part of the social housing to make the development acceptable in planning terms, by providing an active frontage to Golden Lane.
3. In order to rationalise the land to form the Site, amalgamate it within the City's ownership for the purpose of the Scheme, and enable the Scheme to proceed, the following land transactions are required: (i) Transfer of the LBI Land to the City; (ii) the GLE Land to be appropriated for the purposes of the Scheme; (iii) A lease in the part of the Site to be occupied by the school to be granted by the City to the City of London Academies Trust ("COLAT").
4. In June 2018 the transactions were authorised on the basis that the and was to be acquired by the City in its general corporate capacity and the appropriation of the City's Land was to be for education. The transactions have not taken place. Since June 2018 it has been clarified that the proposed uses of the land and terms and conditions of the transfer of the LBI Land and funding make it appropriate for acquisition to be under education and housing powers.

5. In addition, the City's Rights of Light ("RoL") advisers identified that the Scheme will result in some actionable Rights of Light infringements which will mean that affected rights holders could seek injunctions to prevent or remove any structures causing the infringements, unless the statutory protection from injunction under Section 203 of the Housing and Planning Act 2016 ("S203") is engaged.
6. However, the arrangements authorised in June do not engage S203 because this would require (i) the LBI land to be acquired by a local authority that could compulsorily acquire it (rather than acquired by the City in its general corporate capacity, as previously proposed); and (ii) the appropriation of adjacent GLE Land to be for planning purposes (rather than for education purposes).

Next Steps/Evaluation of Criteria

7. The proposed transactions can proceed so as to ensure the land is held appropriately and so as to engage the S203 protection from injunction, as follows: (i) that part of the LBI Land to be occupied by the school to be acquired by the City under Section 7 of the City of London (Various Powers) Act 1958 (ii) that part of the LBI Land to be occupied by social housing to be acquired by the City under Section 17 Housing Act 1985; (iii) the City's Land to be appropriated for planning purposes¹; (iv) the lease of the new school premises to COLAT to be granted under Section 9 of the City of London (Various Powers) Act 1958.
8. The use of the statutory powers outlined in paragraph 6 require the relevant statutory criteria to be met. These are considered under "Legal Implications" below. In deciding whether or not to engage S203 the City must be satisfied that there is a compelling case in the public interest. The tests to be applied in deciding whether there is such a compelling case are explained under "Legal Implications" and evaluated at **Appendix 1**. The conclusion is that it is considered the tests are met and the powers should be engaged.

The Transactions & Terms

The Transfer of the LBI Land to the City

9. It is proposed that the freehold interest in that part of the LBI Land on which the school is to be located (shown edged in bold black on the **Proposed Site Breakdown Plan** annexed) be acquired by the City for the purposes of the new school under Section 7 of the City of London (Various Powers) Act 1958.

¹ Court of Common Council 8/12/2016 delegated to Planning and Transportation Committee authority to determine whether appropriations for planning purposes in order to engage S203 should be authorised

10. It is proposed that the freehold interest in all that part of the LBI Land on which the housing is to be located (shown hatched – and in respect of airspace, shown stippled - on the **Proposed Site Breakdown Plan** annexed) be acquired by the City in its capacity as housing authority for housing purposes under Section 17 Housing Act 1985.
11. The key terms on which the LBI Land is to be transferred to the City, and the covenants to which the City will be bound, are broadly as follows:
- Nil consideration to be paid by the City to LBI for the LBI Land.
 - Amalgamation of the City's Land and the LBI Land is required, to allow for optimum use of the Site
 - The City to pay for development of the social housing using S.106 affordable housing contributions and Right to Buy receipts and to be responsible for construction of the social housing (with a contribution being made by LBI)
 - The City to be responsible for construction of the school (with an agreed estimated construction cost to be funded by the Education and Skills Funding Agency). LBI to have nomination rights to 50% of the new social housing units

Appropriation

12. The City's Land is part of the GLE and was acquired and is held for housing purposes. (See two areas shown shaded grey on **Existing Site Breakdown Plan** annexed). The majority is within LBI's administrative area, and part is in the City's. Children and Community Services Committee resolved in June 2018 that the City's Land was not required for housing purposes. It is proposed that the City's Land be appropriated to planning purposes. Given the provision of replacement housing land as part of the Scheme the Chamberlain is satisfied no payments are required to account for the appropriation.

Grant of Lease to COLAT

13. It is proposed that following its acquisition of the LBI Land and the appropriation of the City's Land for planning purposes, the City will grant a leasehold interest in all that land on which the school is to be constructed (to exclude the airspace to be occupied by the new social housing) to COLAT under its powers in Section 9 City of London (Various Powers) Act 1958.
14. The key terms on which the City will assign the lease are as follows:
- The lease is for a term of 125 years
 - Nominal annual rent
 - Tenant's right to break every 25 years with SoS approval
 - Premises to be used for education and ancillary uses

- Tenant to insure

Legal Implications

Powers for Land Transactions

15. Appropriation – Section 12 of the City of London (Various Powers) Act 1949 provides that where land is no longer required for the purpose for which it was originally acquired it may be appropriated for any other purpose for which the Corporation is authorised to acquire land, and the accounts of the Corporation shall be adjusted as may be necessary. The power conferred by section 12 of the 1949 Act applies to land within Greater London other than an outer London Borough and therefore applies to land in the City and in Islington. As noted above the Corporation (under section 7 of the City of London (Various Powers) Act 1958) may for the purpose of any of their functions acquire by agreement land whether situate within or without the City. Under section 226(5) of the Town and Country Planning Act 1990, subject to the consultation requirements in section 226(6), the Secretary of State may authorise a local authority to acquire land outside its area. The appropriation is therefore for a planning purpose as defined by section 246(1) of the Town and Country Planning Act 1990.
16. Acquisition of Land for Education Purposes - Section 531 of the Education Act 1996 clarifies that making land available for the purposes of a school which the local authority has the power to assist² is a local authority function which engages its land acquisition powers³. The City may acquire that part of the LBI Land required for the school under Section 7 of the City of London (Various Powers) Act 1958 (“1958 Act”).
17. Acquisition of land for Housing Purposes – Section 17(1) of the Housing Act 1985 empowers the City to acquire land for the erection of houses. The City has power to provide housing, including outside its area, under Section 14 of the Housing Act 1985.
18. Use of housing for Workspace – Section 15 of the Housing Act 1985 authorises the use of land acquired for housing for commercial purposes with the Secretary of State’s consent. (Consent has been sought and confirmation is awaited)
19. Grant of Lease to COLAT – Insofar as the land where the school is to be located has been acquired for education purposes under Section 7 of the 1958 Act, it may be leased to COLAT under Section 9 of the 1958 Act on such terms and conditions as the City thinks fit. Insofar as the land where the school is to be located has been appropriated from housing to planning purposes, it may be leased to COLAT under Section 233 of the Town and

² Section 530 of the Education Act 1996 authorises local authorities to compulsorily purchase land within or outside their area which is required for the purpose of an Academy

³ In this case, under Section 7 of the City of London (Various Powers) Act 1958

Country Planning Act 1990 in order to secure the best use of that land. The City may reasonably conclude that the grant of the lease to COLAT secures the best use of the land given the benefits of amalgamation of the Site and the proposed education use. The disposal must be at best consideration unless the Secretary of State's consent is first obtained. (Consent has been sought and confirmation is awaited)

20. It is not considered that the grant of the lease would make CoLAT subject to the influence of the City Corporation in its local authority capacity⁴. Under the current Academies Financial Handbook, CoLAT will need to ensure the requirements for managing related party transactions are followed, including avoiding real and perceived conflicts and promoting integrity and openness in accordance with the seven principles of public life. CoLAT will need to obtain the relevant approvals from the ESFA to take up the lease. CoLAT will also need to ensure that any lease maintains the principles of value for money, regularity and propriety (para 3.6.4) and disclose the lease in its audited accounts (para 3.1.2).

Engagement of S203

21. Statutory Conditions - Appendix 1 sets out the statutory conditions which must be fulfilled in order to engage the provisions of S203, allowing easements to be overridden, and confirms that the recommended arrangements fulfil the statutory conditions.
22. Other criteria - Where land acquisition takes place for the purpose of engaging S203, public interest criteria should be evaluated. In this case, the acquisition is required in order to assemble the site and enable the development to proceed. However, it is acknowledged that the basis of the acquisition and the appropriation will result in S203 being engaged and, insofar as relevant, the public interest criteria are set out and evaluated in Appendix 1.

Financial Implications

23. The appropriate accounting adjustments will be required to reflect the fair value of any donated assets within the transactions.

⁴ S.69 Local Government and Housing Act 1989. The relevant conditions for a company to be subject to local authority influence are not all met.

Conclusion and Reasons for Recommendations

24. The recommended basis of the land transactions the subject of this report are proposed to ensure the land is held appropriately and to remove the risk of injunction impeding the scheme. If the risk remains in place the prudence of expending public monies in implementation is in doubt and the scheme in jeopardy. The recommended resolutions are required to enable the Scheme to proceed and the social benefits of the new school and social housing to be realised.

Appendix 1 – S.203 Evaluation

Annexure - Existing Site Breakdown Plan and Proposed Site Breakdown Plan

Background Papers

Land Transaction Report June 2018

Deborah Cluett

Assistant City Solicitor

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APPENDIX 1

Statutory Conditions

1. The statutory conditions which must be fulfilled in order for S203 to be engaged are set out and considered below:
 - a. *The land has become vested in or acquired by a specified authority or appropriated by a local authority for a planning purpose on or after 13 July 2016 (or the land is “other qualifying land”).* Under the recommended arrangements the City is a specified authority which will acquire the LBI land after 13th July 2016, and the City land will be appropriated for planning purposes.
 - b. *There is a planning permission for the building/use.* Permissions were issued by LBI and the City on 19 July 2018.
 - c. *The specified authority could acquire the land compulsorily for the purpose of the building/use.* S.530 Education Act 1996 empowers the Secretary of State to authorise a local authority to acquire land compulsorily for the purpose of an Academy, S.17(3) Housing Act 1980 empowers a local authority to acquire land compulsorily for housing purposes if authorised by the SoS.
 - d. *The building/use is for purposes related to the purpose for which the land was acquired/appropriated.* The City intends to redevelop the Site in order to provide a school and social housing in accordance with the purposes of acquisition and appropriation set out in the body of the report.

The statutory conditions are considered to be fulfilled.

Relevant Criteria and Evaluation

2. In agreeing for the City to consider acquisitions/appropriations for planning purposes on a case by case basis, Court of Common Council referred to an expectation that adequate attempts to remove injunction risk by negotiation would first be made, and consideration to be given to whether rights holders are prepared to release rights on reasonable terms and within a reasonable time. These matters are considered in paragraphs 13 and 14 below.
3. Before making a decision to acquire the LBI Land and appropriate the City Land as proposed consideration should be given to the issues identified at below and the City must be satisfied that there is a compelling case in the public interest that the powers conferred by S203 be engaged and in particular, that:
 - (i) There is planning consent for the proposed development;
 - (ii) Acquisition or appropriation and consequent engagement of S203 will facilitate the carrying out of development, redevelopment or improvement on or in relation to land, and in particular the proposed development for which planning consent has been obtained, or similar development;
 - (iii) The development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental wellbeing of the authority's area and those benefits could not be achieved without giving rise to all of some of

the infringements – and it is in the public interest that the land be acquired by the City or appropriated by them for planning purposes, so as to facilitate the development proposed or similar development.

- (iv) There will be infringements of one or more relevant rights or interests as defined in section 205(1) of the HPA2016 or breach of a restriction as to user of land which cannot reasonably be avoided;
- (v) The easements to be interfered with cannot reasonably be released by agreement with affected owners within a reasonable time (and adequate evidence of satisfactory engagement, and where appropriate negotiation, has been provided to the City);
- (vi) The ability to carry out the development, including for financial or viability reasons, is prejudiced due to the risk of injunction, and release of rights by negotiation cannot reasonably be achieved;
- (vii) A decision to acquire or appropriate in order to engage S203 would be broadly consistent with advice given in the DCLG Guidance on Compulsory Purchase (2015) updated in February 2018) (the **DCLG Guidance**) (and any replacement thereof) so far as relevant.
- (viii) The use of the powers is proportionate in that the public benefits to be achieved so as to outweigh the infringement of human rights;

Each of these considerations is dealt with using the same enumeration below.

(i) Planning permission

4. Planning permission was granted for the Development on 19 July 2018.

(ii) Facilitation of the Revised Development by use of S203

5. The school site is required to accommodate the City of London Primary Academy (COLPAI) from July 2020. The school has been established and currently occupies temporary accommodation at Moreland School until July 2020. A years' extension from July 2019 was obtained on the strict basis that it could not be further extended as the area is required by the host school. There is unlikely to be any other suitable temporary accommodation available after 2020, and ongoing uncertainty about the delivery programme would cause significant disquiet to pupils, parents and staff, prejudicing the successful progress of the school.

(iii) Revised Development in the public interest

6. The school will provide high quality primary places for families in the City, as well as in LBI. There is increasing potential demand for school places from families within the City, and, contrary to central and regional government policy, choice is currently limited as the only state funded primary school, Sir John Cass, is not in the vicinity, is a Church of England School, and places are largely taken by families living outside the City. All other schools in the City are in the independent sector.

7. The social housing will provide accommodation for people on both the City's and Islington's housing waiting lists who are in housing need and will result in a quantitative housing gain. Central and regional government policy recognises the urgent need for additional affordable housing. By facilitating the provision of a school and social housing, the acquisition and appropriation of land is likely to contribute to the achievement of the promotion or improvement of the economic, social and environmental well-being of the City's and the London Borough of Islington's area.;
8. The Scheme promotes the following key London Plan policies:
 - 7.1 Policy 3.3 - Ensure the housing need identified in the London Plan is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London which would enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.
 - 7.2 Policy 3.11 - Maximise affordable housing provision and seek an average of at least 13,200 more affordable homes per year in London over the term of the London Plan.
9. The Scheme promotes the following key Local Plan policy:

CS22 - maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

(iv) Infringement of rights by the Revised Development cannot be reasonably avoided

10. During the evolution of the Scheme consideration was given to alternative configurations aimed at minimising interference with neighbours' light. This included co-locating the school and housing together but this would have resulted in worsened impacts to the College of Fashion and would have unacceptably extended the timetable for completion of the school. The proposed residential tower was reduced, removing 6 social housing units, in order to reduce impacts on daylight and sunlight and Rights of Light. In order to achieve any further significant reduction it would have been necessary to remove 8 storeys, substantially reducing the number of social housing units. The developer did not consider this to meet policy aspirations regarding best use of land and increasing social housing.
11. The impacts in planning terms, of the issues of daylight, sunlight and overshadowing were considered by both local planning authorities when they resolved to grant planning permission. Both local planning authorities acknowledged that there was significant harm but concluded that overall, the benefits outweighed the harm and justified the grant of planning permission.

(v) Rights of light cannot reasonably be released by agreement

12. In cases where the acquisition is transacted solely to engage S203, consideration should be given to whether it is necessary, or whether agreements to permit infringement can be reached with owners of affected properties with rights of light on reasonable terms and within reasonable timeframes. In this case, the acquisition is necessary in order to assemble the site on which the development is proposed and ensure it is appropriately held under relevant powers. Nevertheless, an evaluation of whether agreements could be reached is considered below.

13. It was considered premature to approach rights holders about terms for the release of their Rights of Light while numerous pre-requisites for the development to proceed were outstanding. A condition for the LBI Land to be transferred to the City is that the City covenant to construct the school. The City was not in a position to give this covenant until the required ESFA funding for the school's construction was available. In late September an informal indication that the required funding would be provided was received and at the time of writing this report a written funding offer is awaited. On receipt, all key pre-requisites for the project will be in place. Given the resources required to progress Rights of Light negotiations (for both the developer and the rights holders), and the expectations raised once negotiations commence, it was not considered fair or prudent to initiate the negotiations pending confirmation of ESFA funding. As soon as practicable following confirmation, rights holders will be proactively approached to commence negotiations and conclude them as soon as possible. However, given the programme to ensure the school is ready for Summer 2020, it is not considered that there is a realistic prospect that agreements will be reached and binding deeds of release entered into with all affected owners in time to enable the Scheme to proceed to programme. Reliance on the provisions of S203 is therefore necessary in the public interest to enable the scheme to proceed in advance of all agreements being completed.
14. However, assurance that fair offers will be made to rights holders for the release of their rights is provided by Recommendation 5 which instructs the Rights of Light advisers to proactively approach affected rights holders and offer fair and reasonable compensation sums on a normal property rights basis based on a non-profit making local authority scheme. In addition, rights holders will be advised that should they seek their own professional advice, the reasonable fees of their advisers will also be reimbursed. Based on the circumstances set out above and in paragraph 13, a departure from the general approach adopted by Court of Common Council regarding prior negotiations (see paragraph 2 above) is considered justified.
15. Insofar as acquisitions/appropriations for planning purposes are concerned, Court of Common Council, on 8 December 2016, in agreeing cases would be considered on a case by case basis and delegating determination to Planning and Transportation Committee, confirmed that "*Wherever feasible and appropriate the developer will be expected to demonstrate that rights holders have been appropriately advised of the proposed resolution, made aware of any report, and provided with a contact at the City to whom they can direct comments*". Although this is not a case of an acquisition being transacted solely to engage S203, rights holders have been advised of this report and provided with a contact to whom they can direct comments. Any relevant comments received will be reported to the committee.

(vi) The Scheme is prejudiced due to risk of injunction

16. For the reasons set out at paragraphs 4 to 14 above, delivery of the Scheme in accordance with the agreed programme stands to be prejudiced by the risk of injunction while it remains open to an affected rights holder to prevent infringement.

(vii) Decision to engage S203 would be consistent with DCLG Guidance

17. The advice given in the DCLG Guidance on compulsory purchase should be taken into account in deciding whether to acquire land in order to engage the provisions of S203. At paragraph 12, the DCLG Guidance states that a compulsory purchase order should only be made where there is a compelling case in the public interest. A similar approach should be taken when deciding whether to engage S203. Given that it is in the public interest that the Scheme should proceed (as discussed in paragraphs 4 to 10 above), and the prejudice to

the Scheme whilst the prospect of an injunction to restrain interference with rights to light remains, there is a compelling case in the public interest that the acquisition and appropriation proceed in a way which ensures the provisions of S203 are engaged.

18. The DCLG Guidance also says that when making and confirming an order, acquiring authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. These issues are considered below in part (viii).

(viii) Public benefits associated with engagement of S203 outweigh infringement of human rights

19. Human Rights issues arise in respect of the proposed arrangements. An acquiring authority should be sure that the purposes of the Scheme for which rights are to be overridden sufficiently justify interfering with the human rights of those with interests in the land affected. Furthermore, following the introduction of the Human Rights Act 1998 the City is required to act in accordance with the European Convention on Human Rights (the **ECHR**) in deciding whether or not to implement the arrangements. Article 1 of the First Protocol of the ECHR provides that every natural or legal person is entitled to peaceful enjoyment of their possessions. Acquisition in a way which engages S203 to allow interference with rights of light, involves interference with a person's rights under this Article. As these rights are enjoyed by corporate bodies as well as individuals all of those whose rights will be affected can claim an infringement.
20. However, the right to peaceful enjoyment of possessions in this Article is a qualified rather than absolute right, as the wording of Article 1 of Protocol 1 permits the deprivation of an individual's possessions where it is in the public interest and subject to the conditions provided for by law and by the general principles of international law. In cases such as this, where rights to light are enjoyed by residential properties Article 8 is also engaged (the right to respect for private and family life and a person's home). Article 8(2) allows for interference which is "in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the protection of health and morals, or for the protection of the rights and freedoms of others".
21. There must therefore be a balancing exercise between the public interest and the individual's rights whereby any interference in the individual's rights must be necessary and proportionate. "Proportionate" in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim. A "fair balance" must be struck between the rights of the individual and the rights of the public. It is for members to consider the issues raised in this report and to strike that "fair balance" in coming to its decision.
22. In the present case it is considered that the public interest in facilitating the Scheme outweighs the rights of the individuals to peaceful enjoyment of their possessions and their right for private and family life and home and that the proposed use of S203 powers amounts to a proportionate interference in all the circumstances.
23. Central to the issue of proportionality is the extent of infringements and availability of compensation to those who are deprived of their Rights of Light. The extent of infringements is indicated in the list of affected properties at Appendix 1A.

24. The key public benefits arising from the Revised Development are set out at paragraphs 4 to 10 above. The planning implications of the Scheme have been fully considered and it has been deemed acceptable with planning permission being granted in July 2018.

Appendix 1A

List of Affected Properties

Actionable Injuries Caused by Proposed Development on Land Owned by the London Borough of Islington (LBI) – See drawings ROL_12_004 & 005

Invicta House (Commercial)

The development on the LBI land would cause actionable injuries at basement, ground and first floor level.

Banner House (Residential)

No actionable injury.

Basterfield House (Residential)

The development on the LBI land causes actionable injuries to 17 flats. To 13 of these flats the injury occurs to the bathroom, in 2 the injury occurs to the kitchen and in 2 flats there are injuries in the kitchen and bathroom.

Golden Lane Community Centre

No actionable injuries.

Hatfield House (Commercial)

There are actionable injuries to kitchens to 2 flats.

Cision House (Commercial)

Actionable injuries would occur to 6 office areas.

14 Baltic Street (Commercial)

No actionable injuries.

12 Baltic Street (Residential)

Actionable injury at ground floor level.

10 Baltic Street East (Commercial)

No actionable injuries.

London College of Fashion (including School House)

Actionable injury to one room at ground and first floor level to School House. 6 rooms with actionable injuries to the main building, but none to areas believed to be classrooms.

London House (Commercial)

Actionable injury to basement and to office areas at first, second and third floor level.

Additional actionable injuries introduced by proposed development on City of London land (see drawings numbered ROL7520_13_004 & 005)

Invicta House (Commercial)

Very small additional area of loss to 1 room at ground floor level.

Banner House (Residential)

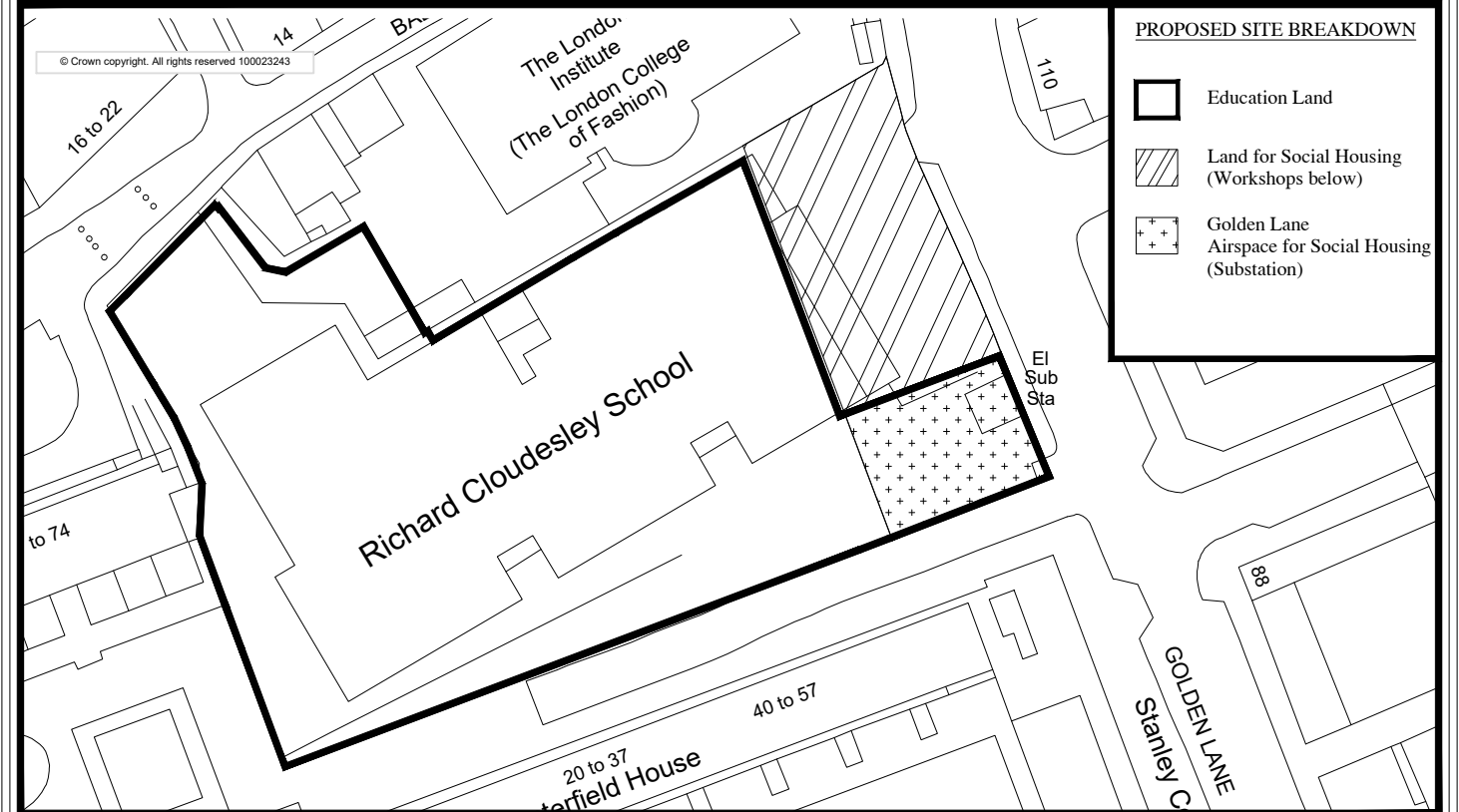
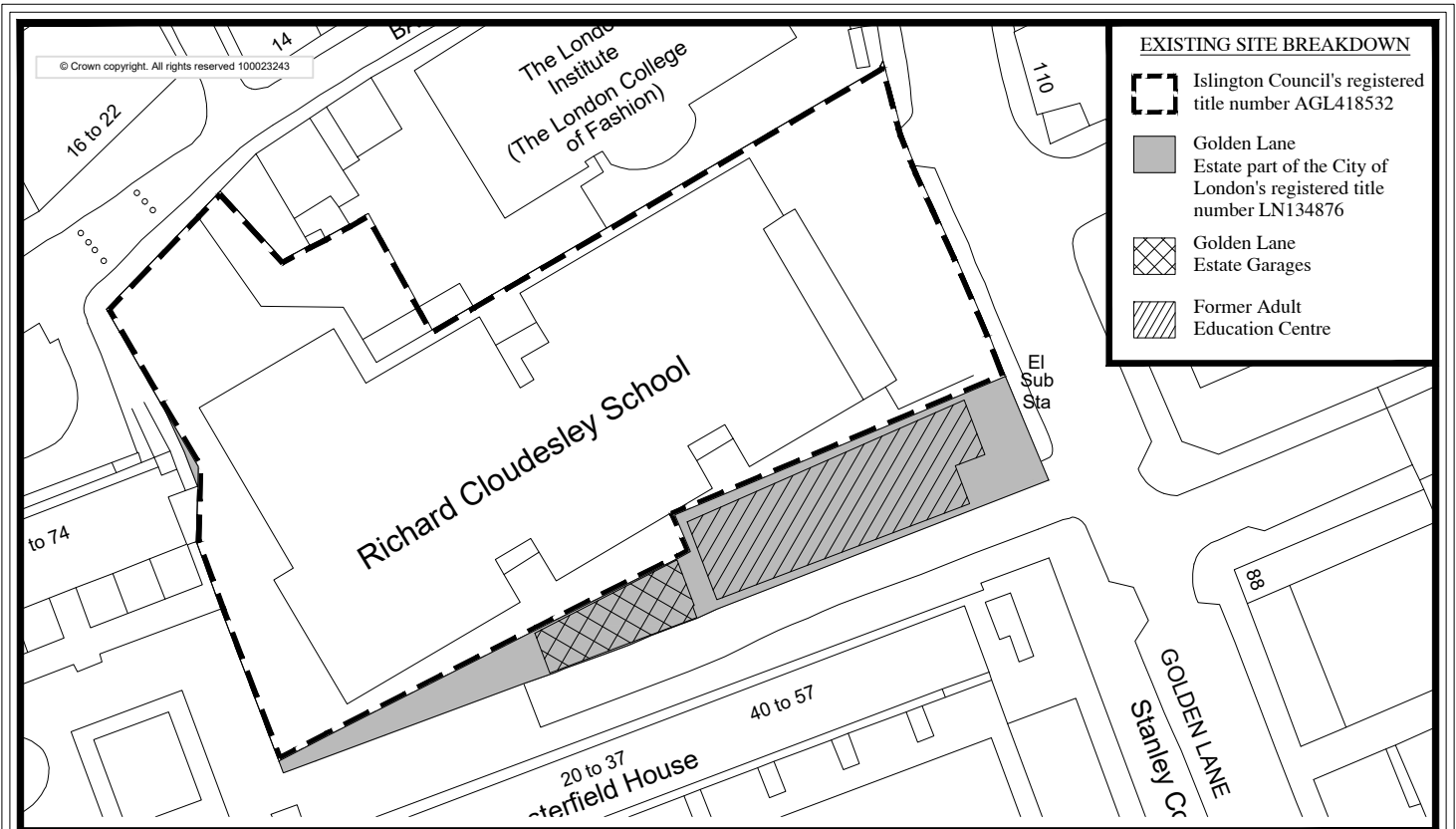
Actionable injury to bedroom of 1 flat.

Basterfield House (Residential)

Additional actionable injury to kitchen of one flat which has an actionably injured bathroom due to the development on LBI land.

There are no additional actionable injuries to the remainder of the properties listed above.


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Address :	
Former Richard Cloudesley School London EC1	
Title :	
Committee Plan (Land Transactions)	
Drawing No :	
5-C-40597 -01	
Pro code	UPRN


CITY OF LONDON
P.G. Wilkinson BSc MSc MRICS
City Surveyor
CITY SURVEYOR'S DEPARTMENT
 Corporate Property Group :
 Plans & Survey Section

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Committee(s): Planning & Transportation – For Information	Date: 30 October 2018
Subject: Bloomberg European Headquarters wins the 2018 Stirling Prize	Public
Report of: The Chief Planning Officer and Development Director	For Information
Report author: Annie Hampson	

Summary

Bloomberg’s European headquarters at 3 Queen Victoria Street has won the 23rd RIBA Stirling prize for architecture.

Recommendation

Members are asked to: Note the report.

Main Report

Background

1. Every year the Royal Institute of British Architects (RIBA) awards the Stirling Prize for excellence in architecture to the UK’s best new building.

Current Position

2. This year’s prize was awarded to the Bloomberg European headquarters.
3. The design by Foster & Partners was described as having a "restrained exterior and dynamic interior to encourage collaboration".
4. RIBA President, Ben Derbyshire, said: "After vigorous debate, the jury reached a unanimous decision - Bloomberg's new European HQ is a monumental achievement. The creativity and tenacity of Foster & Partners and the patronage of Bloomberg have not just raised the bar for office design and city planning but smashed the ceiling".
5. The architects created an exterior that fits respectfully into its surroundings while adding to its character and giving back to the community. The building is the world’s most sustainable office and in October was awarded the highest BREEAM rating of any major office development in the world at design stage, with a 98.5% score. It delivers a 73% saving in water consumption and a 35% saving in energy consumption and associated CO₂ emissions.
6. The scheme, the largest stone building in the City, occupies 3.2 acres between Queen Victoria Street, Cannon Street and Walbrook and provides approximately 1.1 million square feet of sustainable office space. It is comprised of two buildings

connected by a bridge which sit on either side of a new public arcade, which re-establishes the Roman Watling Street.

7. The interior of the building has a central spiral ramp designed to bring people together and encourage chance interactions.
8. A retail area of restaurants and cafes has been created along the Bloomberg Arcade and there are three new public spaces – two featuring a specially commissioned artwork which subtly incorporate security features.
9. It provides a new access to Bank Underground station and a free museum displaying the Roman Temple of Mithras, restored to almost its original site following a major archaeological excavation which revealed hundreds of artefacts, in particular the first written reference to London.
10. The building has attracted a number of awards including the London Planning Awards 2018 for the Best Mixed Use Scheme and the British Council for Offices Corporate Workplace of the Year 2018.

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Committee(s)	Dated:
Planning and Transportation Committee	30/10/2018
Subject: City of London Local Plan Review: Proposed Draft Plan	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Adrian Roche, Department of the Built Environment	

Summary

The City Corporation is reviewing its Local Plan, which sets out the Corporation's vision, objectives and policies for planning the City of London. The current City Local Plan was adopted in 2015 and sets the context for land-use and development requirements up to 2036. The new Local Plan will have an end date of 2036.

Work started on the Local Plan in 2016, and over the last year the Local Plans Sub-Committee of the Grand Committee has been overseeing the preparation of a full draft Plan, to be known as City Plan 2036. The draft Plan is attached as Appendix 1 of this report and the report itself provides a brief summary of some of the key themes in the draft Plan.

Members are asked to agree that it can be published for public consultation next month, alongside the draft Transport Strategy. Consultation will run until the end of February, following which the comments received will be considered and changes made to the Plan as appropriate. A revised version of City Plan 2036 will be published for a final round of consultation in autumn 2019 and will then be submitted for independent examination. The new Plan is expected to be adopted in 2020.

Recommendations

The Local Plans Sub-Committee recommends the Planning and Transportation Committee to:

- Agree the proposed draft Local Plan set out at Appendix 1 of this report for public consultation; and
- Authorise the Director of the Built Environment to make further non-material amendments and editorial changes prior to public consultation.

Main Report

Background

1. The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. The Local Plan has to be consistent with national planning policy and in general conformity with the London Plan, which is currently being reviewed by the Mayor. A draft of the revised London

Plan was published for consultation in December 2017 and will be subject to an Examination in Public between January and May 2019.

2. The current City Local Plan, adopted in 2015, sets out the planning policy context for development in the Square Mile up to 2026. The National Planning Policy Framework (NPPF) indicates that local plans should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities. The NPPF also requires that Local Plans be reviewed at least every 5 years to ensure that they are up to date. In October 2015, the Planning & Transportation Committee gave approval for a review of the Plan to look forward to 2036.
3. An initial public consultation on Issues and Options for the new plan took place in autumn 2016. After this work began on preparing a full draft Plan, informed by a range of factors such as national policy, the London Plan, the Corporation's aspirations, the evidence base and the outcome of the Issues and Options consultation.
4. Over the last year the Local Plans Sub-Committee of the Grand Committee has met on a roughly monthly basis to consider in detail emerging development trends, vision and objectives and emerging policies as they were drafted. Changes suggested by the Sub-Committee through this process were incorporated into a full draft Local Plan, which was considered by the Sub-Committee at a meeting on 9th October 2018.
5. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, the Local Plans Sub-Committee has considered the emerging Transport Strategy at the same time as the Local Plan with the aim of ensuring the policies and proposals in these documents are aligned. Subject to the approval of Planning and Transportation Committee, both draft documents will be published for consultation alongside each other next month.

Draft Local Plan

6. The proposed Draft Plan is attached as Appendix 1 of this report. The structure of the draft Plan follows that of the City Corporation's Corporate Plan to help ensure that spatial planning is aligned as far as possible with wider corporate objectives. The draft Plan will be titled City Plan 2036.
7. By their nature, local plans are relatively lengthy and wide-ranging statutory documents. The full draft Local Plan is attached at Appendix 1, but a bullet point summary of key themes from the draft Plan is set out below:
 - Continued office and employment growth:
 - Employment growth 2016-36: approximately 100,000.
 - Office floorspace target 2016-36: 2,000,000m²
 - Emphasis on flexible and adaptable workspaces.

- Emphasis on high quality design.
- Further tall buildings on appropriate sites in the City Cluster.
- Flexibility for complementary retail, leisure and cultural uses at ground and lower ground levels.
- Implement key aspects of Transport Strategy:
 - Enhanced pedestrian, cycling and public transport.
 - Re-timing of freight deliveries and freight consolidation.
- Continued public realm improvement.
- Further greening and sustainability measures:
 - A new Urban Greening Factor policy.
 - Moving towards a Zero Carbon City by 2050.
 - Emphasis on Circular Economy principles.
 - Expanding the use of Sustainable Drainage.
- Promoting health and well-being:
 - Promoting healthy buildings/Well Building Standard.
 - Significant improvement in air quality.
 - Supporting and promoting health and education facilities.
 - Increase in open spaces and amenity spaces in buildings.
- Meeting London Plan Housing Target:
 - 35% affordable housing on-site.
 - New housing development restricted to existing residential areas.

8. In addition to policies which cover the whole City, the Local Plan contains a set of area-based policies and diagrams which provide a framework for areas of the City where significant change is anticipated during the Plan period. The areas which have been identified as Key Areas of Change are:

- Blackfriars.
- Pool of London.
- Aldgate and Tower.
- City Cluster.
- Fleet Street.
- Smithfield and Barbican (including Culture Mile).
- Liverpool Street.

9. A briefing session for Members of the Planning and Transportation Committee was held on 11th October 2018 in relation to both the draft Local Plan and the draft Transport Strategy. A number of suggested amendments were proposed to the Plan in this briefing and these have been incorporated into the draft Plan as Appendix 1.

10. The current adopted Local Plan includes two Policies Maps showing which policies apply to specific locations. Updated versions of these Policies Maps have been produced to illustrate the proposed policies in the draft City Plan 2036. These are attached to this report at Appendix 2.

Non-material editorial changes

11. Given the size and scope of the draft Local Plan, some minor further amendments and editing is required. This includes proof-reading to correct

any typographical errors, and the addition of infographics and a glossary. Members are asked to authorise the Director of the Built Environment to make these further non-material changes, which will not affect the proposed policy content, prior to public consultation.

12. The draft Plan will be professionally formatted prior to the start of consultation and will be accompanied by a range of supporting material to help illustrate and explain the policies and proposals to the public.

Integrated Impact Assessment

13. The draft Plan has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.
14. The IIA has assessed draft policy options in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. The IIA has been produced in-house but is being independently audited by consultants. A non-technical summary is attached as Appendix 3 to this report. A hard copy of the full IIA document has been placed in the Members' Reading Room and can be sent electronically to any Member on request. It will be published on the City Corporation's website as part of the consultation material. IIA is an iterative process and further assessment will be undertaken on changes made to the Plan following consultation on the draft.
15. A Habitat Regulations Assessment (HRA) Screening Report has been undertaken by consultants to assess whether the draft Plan would have any significant effects on sites designated as being of European importance for their biodiversity. This concludes that the draft Plan is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA, although the opinion of Natural England will be sought on the approach and conclusions of the Screening Report. A hard copy has been placed in the Members' Reading Room and can be sent electronically to any Member on request. It will be published on the City Corporation's website as part of the consultation material.

Evidence base

16. The policies in the draft Plan have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. A number of studies have already been published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036 and more will be added at the start of the public consultation period.

17. Further evidence will be gathered before publication and submission of the revised Plan in autumn 2019. This will include an assessment of the latest employment data from the Office for National Statistics (which suggests further significant growth over the past year) and an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile. An Infrastructure Funding Statement will also be prepared to demonstrate the delivery of infrastructure during the plan period. This will identify the infrastructure required to deliver the Local Plan and examine where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Liaison with utilities companies will be a key element of this work.

Next steps

18. Subject to the approval of this Committee, the draft Local Plan will be published for public consultation during the week beginning 12th November 2018. The consultation period will run until the end of February 2019 and will include a wide range of consultation events designed to engage with different communities and interest groups, including City workers and businesses, City residents, landowners/developers, amenity groups, statutory agencies and other local authorities. Details of consultation events and how to respond to the Local Plan will be published on the City Corporation's website, through social media and press releases and communicated directly to individuals and organisations on the Local Plan consultation database.
19. Comments received during the consultation period will be considered by the Local Plans Sub-Committee during spring 2019 and changes made to the Plan as appropriate. A final version of City Plan 2036 will be brought back to this Committee for approval before being published for a further round of consultation in autumn 2019, following which there will be a statutory examination conducted by an independent planning Inspector appointed by the Secretary of State for Housing, Communities and Local Government. The new Plan is expected to be adopted in 2020.

Corporate and Strategic Implications

20. The review of the Local Plan is being informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The draft Plan provides a spatial planning framework to support key corporate projects such as the relocation of the Museum of London and the potential development of a centre for Music and new Court building, along with proposals to ensure a sufficient future supply of business space by extending the City's tall building cluster. The draft Plan aligns with the draft Transport Strategy, as outlined in paragraph 5 above.

Appendices

- Appendix 1 – draft Local Plan (City Plan 2036)
- Appendix 2 – draft Policies Maps A & B

- Appendix 3 – Integrated Impact Assessment Non-Technical Summary

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DRAFT
CITY OF LONDON LOCAL PLAN
NOVEMBER 2018

City Plan 2036
Shaping the future City

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1. Introduction

1.1. What is the Local Plan?

1.1.1. The Local Plan is a plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. The Local Plan sets out the City Corporation's vision, strategy and objectives for planning the Square Mile, together with policies that guide decisions on planning applications. The Local Plan includes two Policies Maps showing which policies apply to specific locations.

1.2. Why is the City preparing a new Local Plan?

1.2.1. The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look.

1.2.2. Local Plans are required to look ahead over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. However, they must also be reviewed at least every five years to take account of changing circumstances affecting the area, or any relevant changes in national policy.

1.2.3. Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system and some policies need updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London is reviewing the London Plan and has published a draft London Plan, which will be the subject of an Examination-in-Public during the first half of 2019.

1.2.4. By preparing a new Local Plan covering the period to 2036, the City Corporation will be able to address revised national and London Plan policy, whilst maintaining a positive planning framework to meet the City's long-term needs.

1.3. The stages of preparing the Local Plan

1.3.1. The draft Local Plan, titled City Plan 2036 (the 'Plan'), is the second stage of preparing a new local plan. The first stage of the process was the Issues and Options stage, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered to address them. Since then, the City Corporation has analysed the consultation findings and undertaken further evidence gathering to inform the draft Plan.

1.3.2. This draft Plan is being published for an extended period of public consultation. All comments received during the consultation period will be considered and changes made to the Plan as appropriate. A final version of City Plan 2036 will then be published for a further round of consultation in autumn 2019, following which the Plan will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan, which is expected to be adopted in 2020.

1.3.3. Figure 1: illustrates the stages in the preparation of City Plan 2036, together with an indicative timescale. This timetable may be influenced by external factors, including further national changes to the planning system and the progress of the London Plan review.

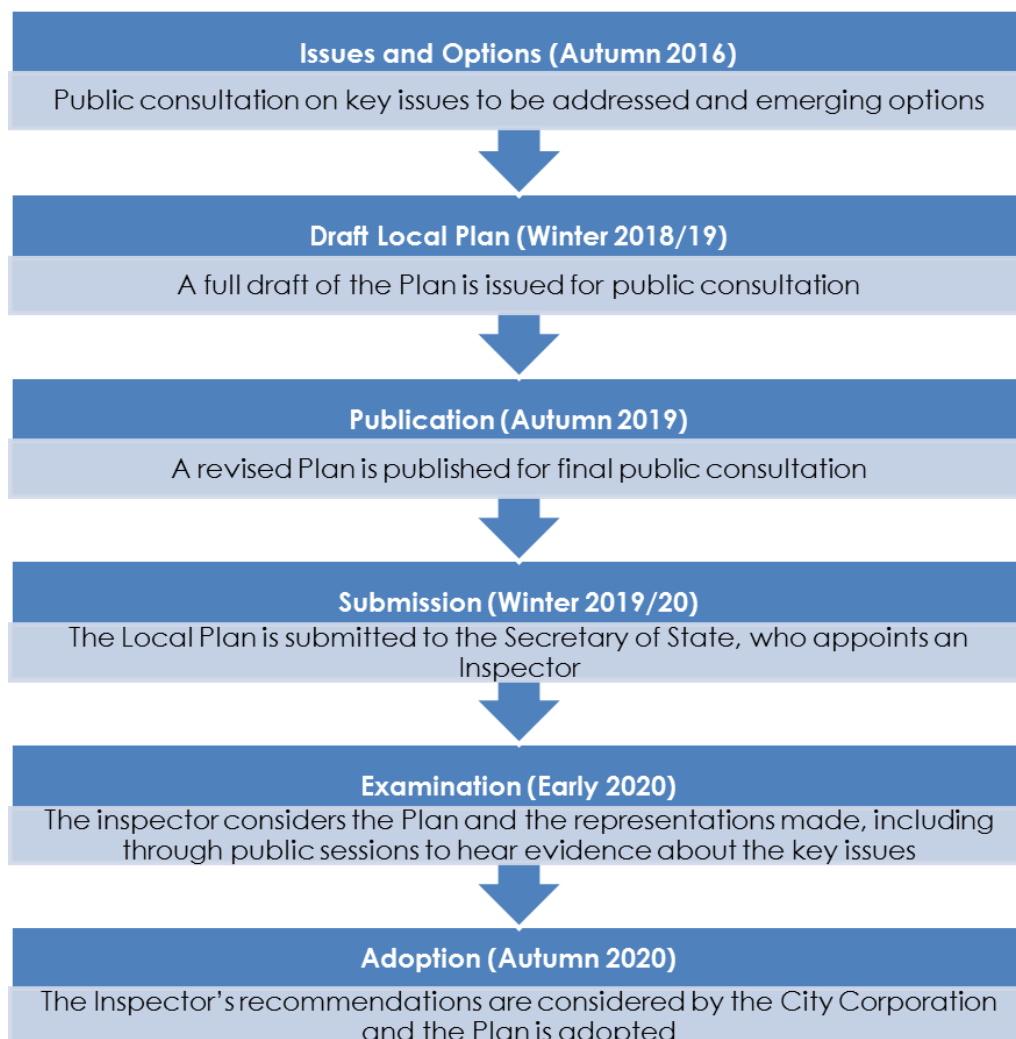


Figure 1: The main stages of preparing the new Local Plan

Policy context

1.3.4. As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on international and national economic considerations and other external policies, particularly the terms of the

United Kingdom's exit from the European Union and its future trading relationship with the European Union and the rest of the world. Within this wider framework, the Local Plan can provide an environment which encourages appropriate development and is responsive and adaptable to change.

- 1.3.5. The Local Plan is influenced by national and London-wide planning policies and guidance, as well as plans and strategies produced by neighbouring boroughs and a range of statutory bodies.

National planning policy and guidance

- 1.3.6. Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.

The London Plan and other Mayoral strategies

- 1.3.7. The Mayor of London has a duty to prepare a spatial development strategy, the London Plan, and to keep it under review. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan for the City of London, along with the City's Local Plan.
- 1.3.8. The Mayor produces supplementary planning guidance to provide further detail on particular policies in the London Plan. In addition, the Mayor publishes a range of other strategies, including those relating to transport, the environment, economic development, housing and culture. These documents have been taken into account in the preparation of the draft Local Plan.

Duty to co-operate

- 1.3.9. Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires local planning authorities to engage "constructively, actively and on an ongoing basis" on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.
- 1.3.10. The City Corporation already works closely and co-operates with its neighbouring boroughs, the Mayor of London and other partners on strategic and cross boundary planning issues. The revised NPPF published in July 2018 introduced a requirement for strategic policy-making authorities to prepare and maintain statements of common ground to demonstrate effective and ongoing joint working. The City Corporation will liaise with the Mayor of London, neighbouring boroughs and other duty to co-operate partners to agree how the statements of common ground will work in London given the Mayor's role, and will prepare one or more such statements in advance of submitting City Plan 2036 to the Secretary of State.



Figure 2: Strategic context: The City of London's location within the Central Activities Zone

City Corporation strategies

1.3.11. The Local Plan can help to facilitate the delivery of other City Corporation strategies where their objectives involve the use or development of land and provides a mechanism to assist with co-ordinating and balancing the requirements of different strategies.

1.3.12. In particular, the Local Plan is one of the mechanisms through which the City Corporation's Corporate Plan will be implemented. The Corporate Plan sets out the City Corporation's overarching strategic direction and is structured around the three pillars of society, economy and environment. Although the Corporate Plan has a shorter time horizon than the Local Plan (2018-23), it is a visionary and forward-looking document and the draft City Plan 2036 complements and helps deliver many of its objectives.

1.3.13. This draft Plan has been prepared alongside the City Corporation's first Transport Strategy. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in the draft Transport Strategy and in the draft City Plan 2036 are aligned.

Evidence base

1.3.14. The policies in the draft City Plan 2036 have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. In some cases, additional studies have been undertaken to provide relevant and up-to-date evidence to support and justify the proposed policies. The evidence that underpins the draft Plan has been published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.

1.3.15. Further evidence will be gathered, and existing evidence updated where necessary, before publication and submission of the revised Plan in autumn 2019. This will include an assessment of the combined effects of the policies in City Plan 2036 on the overall viability of development in the Square Mile and the viability of delivering the Plan's affordable housing targets.

Integrated Impact Assessment

1.3.16. The draft City Plan 2036 has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:

- Sustainability Appraisal, including a Strategic Environmental Assessment;
- Equalities Impact Assessment;
- Health Impact Assessment.

1.3.17. The IIA is an integral part of the plan making process and has assessed draft policy options in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. IIA is an iterative process and further assessment will be undertaken on changes made to the Plan following consultation on the draft.

1.3.18. A Habitat Regulations Assessment has also been undertaken to assess the whether the new Plan would have any significant effects on sites designated as being of European importance for their biodiversity.

Other planning documents

1.3.19. The Local Plan is supported by a number of other planning documents, including:

- Local Development Scheme – this lists and describes all planning policy documents and the timetable for preparing them;
- Statement of Community Involvement – this sets out the procedures and methods that will be used to consult and engage with the public in the preparation of planning policies, and the determination of planning applications.

- Supplementary Planning Documents (SPDs) – these provide further explanation of Local Plan policies where this is needed.
- The City of London Community Infrastructure Levy (CIL) – CIL is a statutory charge on new development that is used to help fund the provision of infrastructure. A charging schedule specifies the rates that apply according to the land uses proposed.

Implementation and delivery

1.3.20. Implementation of the new Local Plan, when adopted, will require partnership working and co-operation with a range of organisations, including developers, businesses, residents, community and amenity groups, transport and service providers, the Mayor of London and neighbouring boroughs.

1.3.21. A key mechanism for implementing the Local Plan is the consideration of planning applications through the development management process. The Local Plan should be read as a whole and applications for planning permission will be considered against all relevant policies in the Local Plan, the London Plan and the NPPF.

1.3.22. The City Corporation will work closely with developers, occupiers and residents to ensure that the City Plan 2036 is implemented and delivers positive improvements across the City. Where necessary, the City Corporation will use its powers of enforcement to ensure compliance with, and effective implementation of, Local Plan objectives and policies. The City Corporation's Enforcement Plan has been adopted as a Supplementary Planning Document and sets out the principles and procedures that will be followed to ensure development is effectively regulated. The Plan contains standards and targets and, where possible, the City Corporation will seek resolution without recourse to formal enforcement action. However, where necessary, enforcement action will be taken. The Enforcement Plan will be kept under review and amended to reflect new provisions arising out of changes to national, London-wide or local policy and/or practice and experience in implementation.

1.3.23. The City Corporation will also use its powers in relation to issues such as management of the highways and public realm to help deliver the vision and policies in the City Plan 2036. It will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high-quality development the City needs. Prior to submitting City Plan 2036 to the Secretary of State, the City Corporation will prepare an Infrastructure Funding Statement, identifying the infrastructure required to deliver the Plan and demonstrating the deliverability of infrastructure during the plan period. This will identify the investment plans of a range of infrastructure providers to determine where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. If gaps in the funding of infrastructure necessary to implement the Local Plan are identified, the City Corporation will seek alternative funding streams, including the use of CIL and other contributions from development, and will prioritise available funds.

1.4. Structure of the Draft Plan

1.4.1. The structure of the draft City Plan 2036 is based on the three strategic aims of the Corporate Plan, which are to:

- Contribute to a flourishing society;
- Support a thriving economy; and
- Shape outstanding environments.

1.4.2. Individual policy topics are grouped within these broad themes. The first policy under each topic is a Strategic Policy, which addresses the strategic context, the relationship with other plans and strategies, and key planning issues. These policies are followed by Development Management Policies that will be used alongside the Strategic Policies in the consideration of applications for planning permission and related consents.

1.4.3. A fourth theme of Key Areas of Change has been added to provide a framework for the area-specific policies within the Local Plan, and a fifth theme of Implementation has been added to focus on how the Plan will be delivered.

1.4.4. The structure of the draft Plan is shown diagrammatically in Figure 3: Structure of draft City Plan 2036 and is not intended to represent any form of hierarchy.

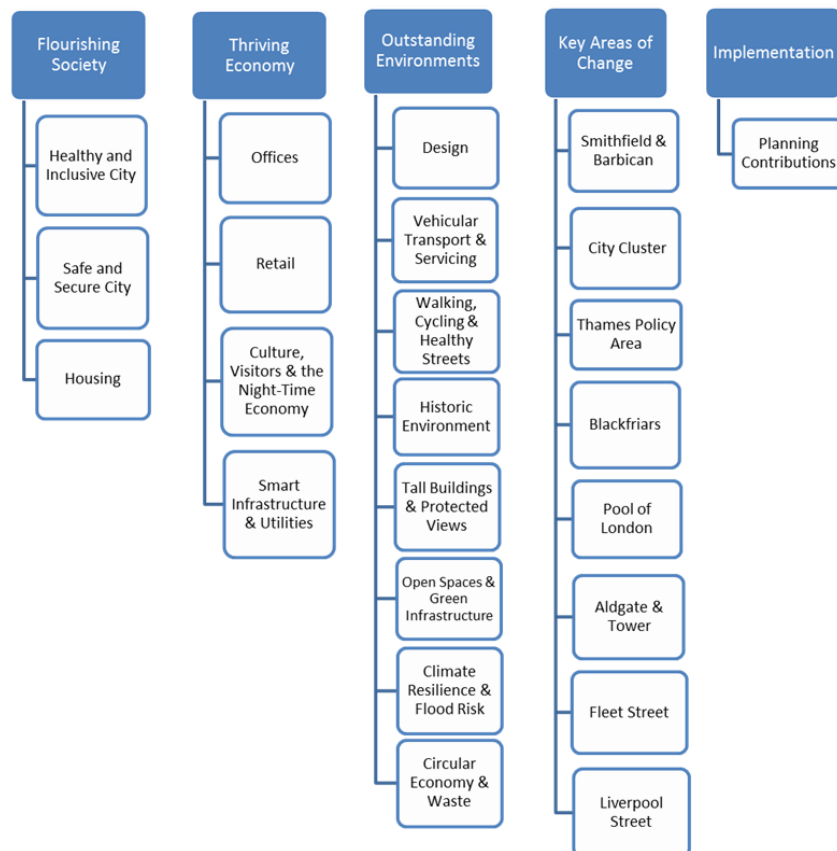


Figure 3: Structure of draft City Plan 2036

2. The City Today

[Key statistics at 31 March 2018. Will be presented in the form of infographics]

- City employment in 2016: 483,000
- Number of businesses 2016: 17,980
- 98% of businesses employ under 250 people
- Total Office Floorspace: 8,820,000m²
- Total office floorspace under construction: 1,479,000m²
- Total office floorspace under construction in City Cluster: 632,000m²
- Residential population: 7,400
- Total residential units: 7,100
- 28% of residential units registered as second homes
- Total retail floorspace: 578,600m²
- Number of retail units: 1,899
- Number of tall buildings over 75m: 53
- 14 tall buildings in the planning pipeline – 10 in City Cluster
- 26 Conservation Areas (27 from October 2018)
- 600+ Listed Buildings
- Total green roof space in the City: 43,100m²
- 33.05 hectares of open space
- 18.4m business and leisure visitors to the City in 2017
- Number of hotel bedrooms: 5,712
- Number of hotel bedrooms under construction: 2,333
- 75% office permissions since 2014 BREEAM rated 'Excellent'

3. City Plan 2036: draft Vision and Strategic Objectives

3.1. Contribute to a Flourishing Society

The Vision....

- 3.1.1. The needs of the City's diverse communities will be met in a sustainable and inclusive way, addressing the health, employment, education, leisure and housing needs of the variety of people who work, live and visit the City.
- 3.1.2. The City's population will enjoy good health and wellbeing. Health inequality across the City will be reduced. Workers and residents will have access to a range of health services within the Square Mile and beyond. Partnership working with businesses and organisations both inside and outside the City will effectively tackle the wider causes of poor health by substantially improving the City's air quality, promoting the recreational benefits of a healthy lifestyle, and ensuring inclusive access to good quality open spaces and recreational opportunities.
- 3.1.3. The City will have a network of high quality social and community facilities in accessible locations to foster cohesive and healthy communities. Links with neighbouring boroughs will be strengthened and closer co-operation will provide a stronger sense of community and more efficient services.
- 3.1.4. There will be a mix of housing, located in or near identified residential clusters, providing a high-quality living environment consistent with a city centre location. Housing will not be appropriate where it would conflict with the City's global business role or result in poor residential amenity. Affordable housing will be required on-site within the City. Where off-site contributions are exceptionally allowed, they will be used to deliver to new affordable housing within and outside of the City, principally on the City's managed housing estates, contributing to meeting London's wider housing needs.
- 3.1.5. The City will remain a safe place to work, live and visit. Security measures will be designed into new buildings and public spaces, whilst ensuring that the City's streets, walkways and open spaces are welcoming and inclusive. Where necessary, an area-wide approach to delivering collective security will be sought.
- 3.1.6. Good building design and effective management of night time entertainment, combined with a broad mix of uses, will reduce the potential for anti-social behaviour, adverse impacts on residents and help to maintain residential amenity.
- 3.1.7. The City's higher education institutions will continue to enjoy an international reputation for excellence. The City will work with partners to ensure that high

quality training and learning opportunities are accessible to all. City residents and those in neighbouring boroughs will develop the skills needed to enter careers in the City and benefit from the City's prosperity. The City will offer equality of opportunity, accessibility and involvement so that people from across London's diverse communities will have the chance to benefit from the many opportunities and facilities it offers.

Strategic Objective:

3.1.8. To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.

3.2. Support a Thriving Economy

The Vision....

3.2.1. The City will remain the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas, including in the technology sector, and delivering inclusive and sustainable growth and prosperity for its communities, London and the UK.

3.2.2. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.

3.2.3. The City will be open to new business, new ideas and new ways of working, reflected in office floorspace that is flexible and adaptable to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. Office space will be complemented by other commercial, cultural and leisure uses adding vibrancy and animation to the City's streets.

3.2.4. The number of business and tourist visits to the City will significantly increase as the City is recognised for its world-class cultural and creative facilities. Culture Mile will transform the north west of the City into a vibrant strategic cultural area of national and international stature.

3.2.5. The quality and quantity of retail facilities will continue to increase to meet rising demand, as the City evolves into an evening and 7-day a week retail, leisure and cultural destination. Retail growth will be focused on the Principal Shopping Centres of Cheapside, Liverpool Street/Moorgate, Leadenhall Market and Fleet Street. Smaller retail units will be provided across the City, animating ground floor spaces and meeting local worker and resident needs.

3.2.6. The City's continued economic success will be underpinned by world-leading digital connectivity and data services both within buildings and in the public

realm. The provision of utilities and infrastructure will anticipate the demands set by the City's growth, funded in part by new development.

Strategic Objective:

3.2.7. To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

3.3. Shape Outstanding Environments

The Vision....

- 3.3.1. The City will be physically well connected and responsive. Sustainable travel patterns and modes of transport will be promoted and public transport capacity increased, principally through the opening of the Elizabeth Line, and the Northern Line/Bank Station Upgrade.
- 3.3.2. The City's streets will provide an attractive and safe environment for walking and cycling. Traffic reduction and improvements to the City's streets and junctions will transform the safety, look and feel of the City's street network.
- 3.3.3. Partnership working with City businesses and developers will minimise the number of delivery and servicing trips into the City and will reduce congestion through consolidation and by re-timing trips to take place outside of peak hours. The majority of last mile deliveries will be undertaken by zero emission vehicles, and the City's air quality will significantly improve as a greater share of motorised traffic switches to electric or other zero emission modes.
- 3.3.4. Use of the River Thames by commuters and for freight and servicing will significantly increase as the Thames becomes a major corridor for the movement of people and the transport of materials including construction and deconstruction materials, waste, freight and general goods.
- 3.3.5. The City will remain a centre of world class architecture with flexible and adaptable buildings and a high quality of public realm for people to admire and enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline, adding to the tall building cluster in the east of the City.
- 3.3.6. The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where required, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting of St Paul's Cathedral and the Tower of London.
- 3.3.7. Buildings, streets and spaces will be inclusive, interesting, legible and fit for purpose. Computer modelling, simulation and smart technology will be used to ensure that new buildings, and the spaces between buildings, create an environment which attracts businesses and people from across the world.

- 3.3.8. The City's buildings, public realm and transport will be highly sustainable, designed to make efficient use of natural resources, minimise emissions and be resilient to natural and man-made threats. In partnership with public and private sector organisations the City will adopt new technologies to adapt towards a zero emission future by 2050.
- 3.3.9. The City will be a much greener place, with additional planting in and around new and existing buildings and spaces, enhancing the environment and mitigating the impacts of pollution. New open and amenity spaces will be created including through the creation of new pedestrian routes, accessible and permeable buildings, and the provision of amenity space at upper or roof levels. Public access to private open space will be encouraged. Biodiversity will be increased by the inclusion of wildlife-friendly features in new and existing open spaces and buildings.
- 3.3.10. The risk of flooding will be minimised by incorporating sustainable drainage into new developments and the public realm, alongside measures to reduce run-off and increase rain water recycling. The Thames Tideway Tunnel will be completed, greatly reducing storm discharges from the combined sewer system and improving the quality of the water in the River Thames.
- 3.3.11. The City will become a Zero Waste City as developers, businesses and residents adopt Circular Economy Principles and reduce the amount of waste they produce whilst keeping resources in use for as long as possible. More flexible building designs will reduce the need for redevelopment of outdated office stock. Walbrook Wharf will continue to provide a facility for transferring materials, including waste, by river barge, thereby reducing lorry traffic in the City and across London.

Strategic Objective:

- 3.3.12. To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets.

3.4. Key Areas for Change

The Vision....

Smithfield and Barbican

- 3.4.1. The Elizabeth Line will significantly enhance public transport accessibility in this part of the City. The Culture Mile initiative including relocation of the Museum of London to Smithfield and the possible development of a Centre for Music alongside the existing Barbican Centre will provide outstanding cultural facilities in landmark buildings. Beech Street will be transformed into a more welcoming environment, with significantly improved air quality, and the Beech Street/Long Lane axis will be the focus for a variety of shops and restaurants. The wider area will contain a broad mix of uses, including residential, office, retail, hotel, leisure and cultural, while temporary art and cultural installations will further animate the

buildings and public realm. The public realm will be enhanced with a distinctive look and feel, creating attractive streetscapes and vistas. Evening and night-time activities will expand and will be well-managed to protect residential amenity. Consolidation of the City Corporation's wholesale markets onto a single site will potentially allow the re-use of Smithfield Meat Market for other uses compatible with its heritage status. St Bartholomew's Hospital will continue to operate as a major centre of health excellence. The potential for conflict between vehicular access to commercial and residential uses and the increased numbers of pedestrians will be effectively managed.

City Cluster

3.4.2. Office and employment growth will be successfully accommodated by a cluster of dynamic, attractive, sustainably designed tall buildings, providing an iconic image of the City and enhancing its role as a global hub for innovation in finance, professional services, commerce and culture. Complementary retail, leisure, cultural and educational facilities will support this primary focus on office floorspace, principally through animating ground floor spaces. Additional greening will be provided within and on buildings and in the public realm and air quality improved. An area wide approach will be taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high-quality public realm and environment that reflects the status of the area. Freight and servicing deliveries will be reduced through off-site consolidation, the re-timing of deliveries outside of peak hours and joint working with occupiers. Pedestrian movement and permeability will be improved and priority given to pedestrians on key routes during daytime. Links to public transport nodes and other parts of the City, including to the Elizabeth Line at Liverpool Street Station, will be improved.

Aldgate and Tower

3.4.3. Partnership working with the London Borough of Tower Hamlets, businesses and residents will provide a framework for the delivery of improvements in this area. Redevelopment and refurbishment will enhance the appearance and vibrancy of this area, with a mix of offices, residential, retail, community and cultural facilities, catering for residents, workers, students and visitors. The open space at Aldgate Square will be the focal point of a high-quality public realm which provides better facilities for pedestrians and cyclists. Air quality will be improved particularly in proximity to St John Cass School and the Middlesex Street and Mansell Street residential estates. Pedestrian connections, permeability and wayfinding will be improved, especially through large development sites and between Aldgate and Tower Gateway. Joint working with TfL and other transport operators will deliver improvements in public transport capacity to meet increasing demand. Residents will have improved access to education, health, training and job opportunities relevant to their needs.

Pool of London

3.4.4. This area provides an iconic view of the City's riverside, with an opportunity for increased vibrancy arising from greater use of the riverside walk, more leisure, retail and cultural public uses at ground level and the provision of publicly

accessible roof terraces and spaces. Servicing of individual buildings will be improved through the introduction of shared servicing bays and access points. The area will be regenerated through the redevelopment or refurbishment of appropriate riverside sites. The public realm and accessibility will be significantly improved. A higher quality pedestrian route will be created between London Bridge and the Tower of London creating a continuous riverside park and walkway free of motorised traffic. Easier pedestrian access across Lower Thames Street will encourage more City workers, residents and visitors to enjoy the riverside. Significant improvements will be made to the environment and air quality along Lower Thames Street.

Blackfriars

3.4.5. Redevelopment or refurbishment of existing buildings will provide new high-quality office and commercial accommodation with active ground floors and within an improved public realm and environment that better reflects the status of the City. Easier access to the riverside walk and a safer and more pleasant environment for all users, including pedestrians and cyclists, will be delivered. A new public open space at Blackfriars foreshore, created through the Thames Tideway project, will introduce greenery to the riverside and provide a place for relaxation and recreation.

Fleet Street

3.4.6. The role of Fleet Street as a centre for judicial and related business in the City will be enhanced by the potential development of a new court building and City of London Police Station. Existing office accommodation will be retained and improved to provide flexible floorspace and spaces to meet changing business needs. Public realm and transportation improvements will deliver a high quality environment which enhances the Principal Shopping Centre and the historic lanes, alleyways, churchyards and spaces that lead off Fleet Street. Additional greening within the public realm and on buildings will deliver visual improvements and improvements in air quality. Where appropriate, residential development will be concentrated in lanes and alleyways away from Fleet Street to ensure a higher quality residential environment for residents.

Liverpool Street

3.4.7. The area will be enhanced, taking advantage of improvements in public transport accessibility brought by the opening of the Elizabeth Line, and opportunities presented by the remodelling of the Broadgate Estate. Pedestrian routes will be enhanced and active frontages provided at ground floor level to animate and add vibrancy to the area. Retail uses will be encouraged and improvements delivered to the public realm around Liverpool Street Station. Additional greening will help to deliver air quality improvements. Office use will continue to be the predominant use but will provide more flexible and collaborative space to meet the needs of potential start-ups and allow for business growth. Collaborative working between businesses in this area, Tech City and creative industries within Culture Mile will create an attractive and vibrant business eco-system.

Strategic Objective:

3.4.8. To ensure that the challenges facing the Key Areas for Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres.

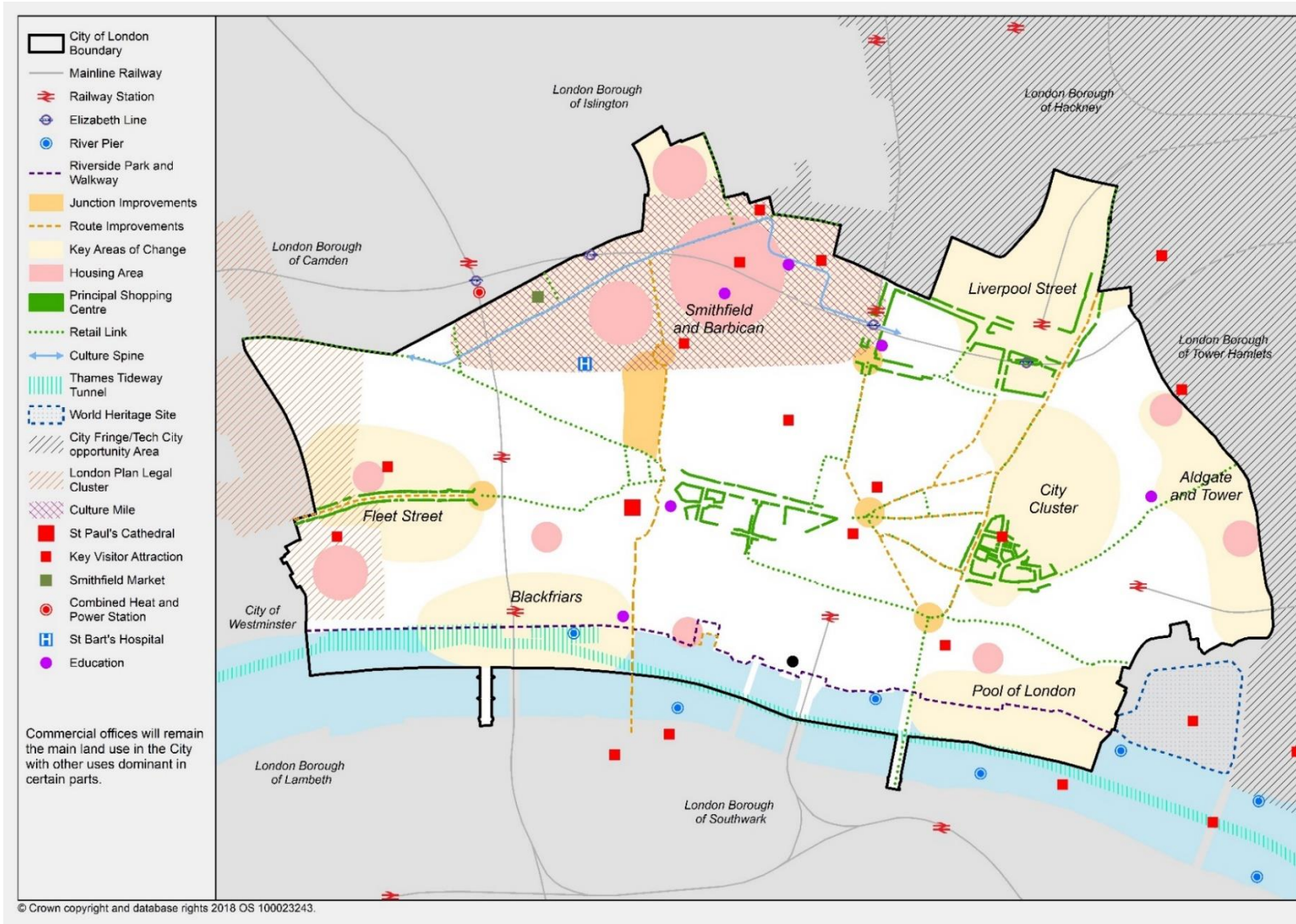


Figure 4: Key Diagram

4. Contribute to a Flourishing Society

4.1. Healthy and Inclusive City

Context

- 4.1.1. The City of London is a very densely built up area with a large daytime population and limited open space. The City's economic success means there is a high level of construction activity, while the density of development and employment, delivery and servicing requirements and the narrowness of many of the City's streets all contribute to traffic congestion. This can result in poor air quality, noise and light pollution and a shortage of adequate open spaces, play and recreational spaces, impacting on the health of residents, workers and visitors.
- 4.1.2. The NPPF and the London Plan stress the importance of health and wellbeing and the role that the planning system can play in improving this. Planning can support strategies to improve health and cultural wellbeing and promote healthy communities. Planning decisions can have an influence on people's health, particularly through the design and management of new development.
- 4.1.3. The City Corporation is committed to enabling an inclusive environment in which nobody is disadvantaged. Everyone should have equal opportunities to access buildings, spaces, job and training opportunities and health, leisure and educational services. An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions and people who do not consider themselves disabled. An inclusive City allows all communities, irrespective of their social and economic position, to equally access the opportunities the City offers.
- 4.1.4. An important element of this commitment is breaking down unnecessary physical barriers and exclusions imposed on disabled people and others by poor design of buildings and spaces. The needs of disabled people should be considered at an early stage of the planning process and not considered separately from the needs of others.
- 4.1.5. A wide range of elements contribute to a healthy and inclusive environment. The transport and design policies in this Plan address relevant issues such as: active travel and permeability, inclusive transport; mitigating the impacts of pollution through the design of streets and public spaces; and providing adequate shade and shelter.

Strategic Policy S1: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment in the City and enable all communities to access a wide range of health, education, recreation and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments on major development proposals;
4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of those with disabilities or mobility impairment;
5. Expecting development to:
 - engage with neighbours before and during construction to minimise adverse amenity impacts;
 - promote healthy buildings and the Well Building Standard;
 - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
 - respect the City's quieter areas;
 - limit the City's contribution to unnecessary light spillage and 'sky glow'
 - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment.
6. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing City schools, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;
7. Encouraging the further provision of both public and private health facilities;
8. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
9. Providing and improving social and educational services through the City's libraries;
10. Supporting nursery provision and additional childcare facilities where a need exists;
11. Protecting and enhancing existing community facilities and providing new facilities where required; and
12. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further facilities, including publicly accessible facilities, within major developments.

Reason for the policy

4.1.6. The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:

- Good mental health for all;
- A healthy urban environment;
- Effective health and social care integration;
- All children have the best start in life; and
- Promoting healthy behaviours.

4.1.7. The second of these priorities is the most relevant to the Local Plan, as it includes issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. The Joint Health and Wellbeing Strategy notes there is strong evidence that the environment shapes health outcomes and it seeks to *“ensure health and wellbeing issues are embedded into the Local Plan and major planning applications”*.

4.1.8. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.

4.1.9. The small permanent residential population in the City means that it is often not economic to deliver effective services within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. For example, the City Corporation is working jointly with Islington to deliver the City of London Primary Academy Islington on a site which crosses the City/Islington border.

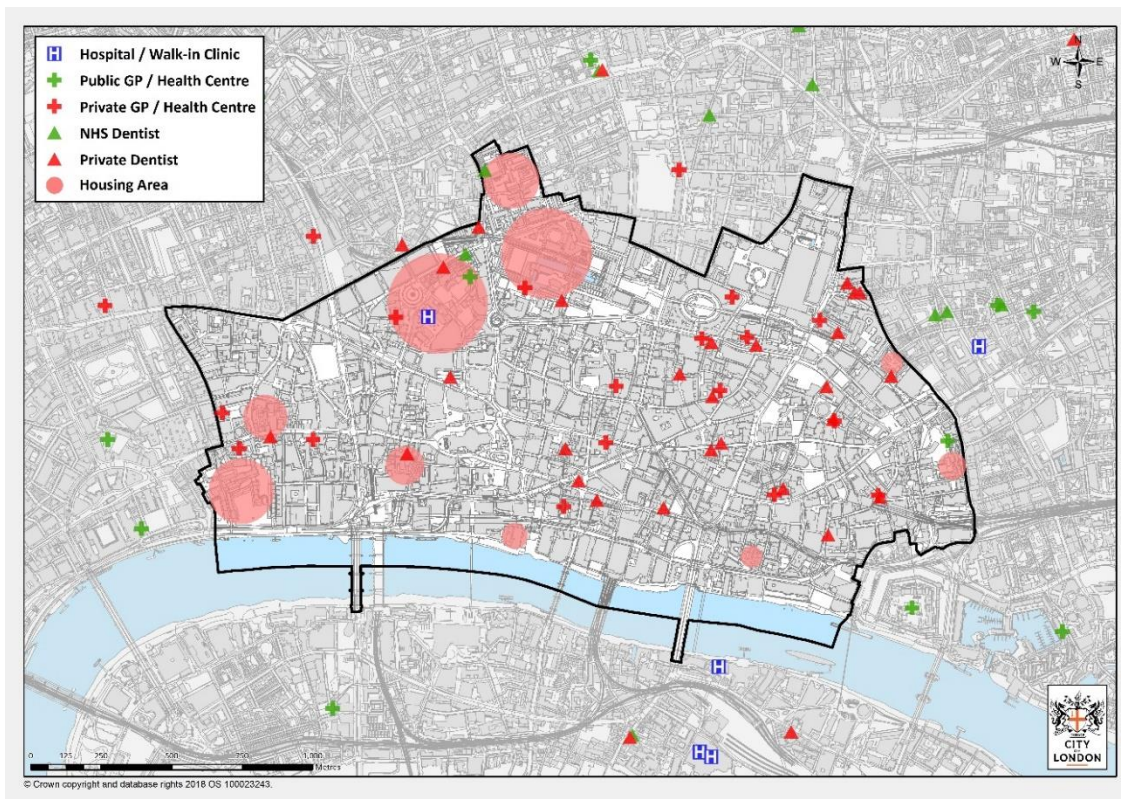


Figure 5: Distribution of health facilities in and adjoining the City

4.1.10. The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.

4.1.11. Advances in technology and an awareness of how office environments can impact people's mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

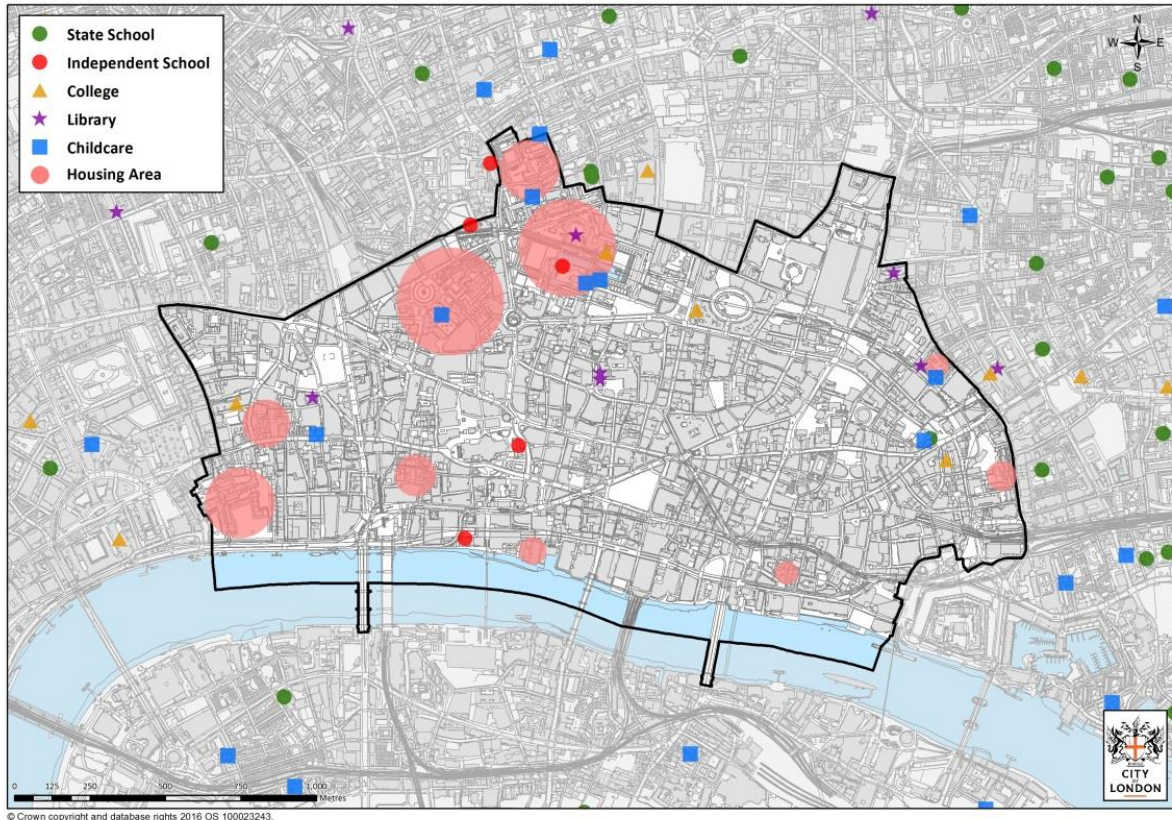


Figure 6: Distribution of skills and education facilities in and adjoining the City

4.1.12. Outdoor spaces and the public realm are under increasing pressure to provide places for flexible working whilst also providing for relaxation and amenity. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels.

4.1.13. The location and nature of the City means that quieter areas, such as churchyards and open spaces, in the City cannot reasonably be expected to be as quiet as similar areas in suburban locations. Nonetheless, perceptions of tranquillity are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels.

4.1.14. The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

How the policy works

- 4.1.15. To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and well-being, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling.
- 4.1.16. To facilitate the delivery of a healthy city, developers should engage with neighbours before and during construction to ensure impacts on the amenity of neighbours can be minimised. Developers are encouraged to use established methodologies, such as Well Certification under the Well Building Standard, to ensure that development contributes towards a healthy city. The Well Building Standard is an accreditation system that attempts to measure how building features impact on health and wellbeing. Compliance requirements for the standard fit into seven key areas; air, water, nourishment, light, fitness, comfort and mind. Each category is scored out of 10 and, depending on the total achieved, silver, gold or platinum certification is achieved.
- 4.1.17. Health Impact Assessments will be required to support development in the City. For developments of between 10 and 99 dwellings or between 1,000 - 9,999 m² of commercial floorspace, developers should use the NHS London Healthy Urban Development Unit's Rapid Health Impact Assessment Tool for preparing their HIA. This allows for a focused investigation of health impacts and should address the most significant impacts and/or those most likely to occur. Full Health Impact Assessments (HIA) should be submitted to support planning applications for over 10,000 sqm GIA for commercial developments or 100 or more residential units. Such assessments consider the impact on people's health of the development.
- 4.1.18. Major commercial developments should seek to reach outwards into the community by providing relevant services with health impacts such as publicly available drinking water, defibrillators and toilets. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.

Policy HIC1: Inclusive buildings and spaces

New Development, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

1. inclusive and safe for all, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
2. convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
3. responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Reason for the policy

4.1.19. The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users and particularly for disabled and elderly people and those with other mobility difficulties. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit.

How the policy works

4.1.20. Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups. Design and Access Statements should include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.

Policy HIC2: Air quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment;
2. Development that would result in deterioration of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be refused;
3. All developments should be at least Air Quality Neutral. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NO_x);
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed Air Quality Impact Assessment will be required for combustion based low and zero carbon technologies, and necessary mitigation must be approved by the City Corporation;
5. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
6. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments;
7. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.

Reason for the policy

4.1.21. Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. National health-based objectives for the pollutants nitrogen dioxide (NO₂) and small particles (PM₁₀) are not being met in the City, in common with all central London, so the whole of the Square Mile has been declared an Air Quality Management Area. The City Corporation has also designated a Low Emission Neighbourhood in the Barbican, Guildhall and Bart's Hospital area of the City with the aim of improving local air quality by reducing the amount of traffic and encouraging and supporting low and zero emission vehicles in the locality.

4.1.22. Tackling poor air quality requires a range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting within the public realm can help to trap particulate pollution. The main source of pollutants in the City is currently road transport but following implementation of the Mayor's Ultra Low Emission Zone in 2019 it is forecast that a greater share of air pollutants will be generated by buildings. It is predicted that by 2020 buildings will account for almost half of NO₂ emissions arising in the City.

How the policy works

4.1.23. The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and the various actions being pursued to improve air quality. The Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile. The City's Code of Practice for Deconstruction and Construction Sites and the Mayor's Control of Dust and Emissions during Construction and Demolition SPG provide guidance on procedures to be adopted to minimise the impacts of demolition and construction activities on air quality.

4.1.24. The Air Quality SPD sets out the circumstances in which an Air Quality Impact Assessment is required and provides guidance on the information required. Such an assessment must be submitted for all major development.

Policy HIC3: Noise and light pollution

1. Developers must consider the noise and lighting impacts of their development.
2. A noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces.

3. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.
4. Any potential noise or light pollution conflicts between existing activities and new development should be minimised. Where the avoidance of such conflicts is impractical, the new development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.
5. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development.
6. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
7. Opportunities will be sought to incorporate improvements to the acoustic environment and existing lighting schemes within major development.

Reason for the policy

4.1.25. The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise and light pollution impacts applies to both development that introduces new sources of noise and light pollution or development that is sensitive to noise and light pollution.

4.1.26. The main noise sources related to new developments in the City are:

- Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
- Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- Leisure facilities and licensed premises, involving noise from people and amplified music; and
- Servicing activities such as deliveries, window cleaning and building maintenance.

4.1.27. Noise sensitive developments in the City include residential developments (including hotels and serviced apartments), health facilities, schools and childcare provision and certain open spaces. For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.

4.1.28. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making. Policy DM XX: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.

How the policy works

4.1.29. The City of London Noise Strategy 2016-2026 identifies the strategic approach to noise in the City and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

4.1.30. When bringing forward major development proposals, developers are encouraged to consider whether there may be opportunities to enhance the existing acoustic environment, for instance by incorporating water features that can aid relaxation and help to mask traffic noise. More information about this can be found in the City's Noise Strategy.

4.1.31. The City Corporation has adopted a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes.

Policy HIC4: Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

Reason for the policy

4.1.32. When a site is developed and ground conditions change there is potential for contaminants to be mobilised, increasing the risk of harm. Site investigation should establish whether the proposed use is compatible with the land condition. The phrase non-human receptors encompasses buildings and other property, or ecological systems and habitats, which may be harmed as a result of contaminated land or water.

How the policy works

4.1.33. Pre-application discussions will be used to identify the particular issues related to environmental protection that are relevant to each development site. The City Corporation has published a Contaminated Land Strategy and a Contaminated Land Inspection Strategy, which provide details of the issues likely to be encountered in different parts of the City and should be used for reference by developers.

Policy HIC5: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:

- replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
- necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another similar use on the site.

2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:

- where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- in locations which are convenient to the communities they serve;
- in or near identified residential areas, providing their amenity is safeguarded;
- as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Reason for the policy

4.1.34. Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services. As such they make a significant contribution to people's mental and physical well-being, sense of community, learning and education. Library and educational facilities for children and those that support the City's business and cultural roles are particularly important.

How the policy works

4.1.35. Existing social and community facilities will be protected, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of social and community use in the first instance. Proposals for the redevelopment or change of use of social and community facilities to an alternative use must be accompanied by evidence of a lack of need for the existing facilities and a greater need for the proposed new facilities.

4.1.36. Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources. Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.

4.1.37. Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable or better standard.

Policy HIC6: Public conveniences

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of directly accessible public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. Provision should be made for disabled people and their carers (changing places toilets). Public toilets should be available during normal opening hours, or 24 hours a day in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets, unless adequate provision is available nearby, and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Reason for the policy

4.1.38. Inclusive and accessible toilet provision is essential to meet the needs of all communities. Public conveniences are a particularly important facility for a number of groups, such as the elderly, disabled and parents with young children and are a necessity in areas where people spend considerable time such as tourist areas.

4.1.39. Areas of the City with concentrations of night-time entertainment require adequate toilet provision to prevent fouling of the streets.

How the policy works

4.1.40. The City Corporation provides public toilets and aims to provide a distribution which effectively meets public demand, but this needs to be supplemented by provision in major retail and leisure development and through encouraging membership of the Community Toilet Scheme. The City Corporation provides attended toilets equipped with baby changing units and facilities for disabled people, while automatic toilets provide a 24-hour service. The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

4.1.41. Public toilets should be clearly signposted to ensure they are easily found. The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.

4.1.42. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, rather than as a replacement. Consideration should be given to the provision of self-contained gender-neutral toilets.

Policy HIC7: Sport and recreation

1. Existing public sport and recreational facilities will be protected in situ, unless:

- replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or
- necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- it has been demonstrated through active marketing, at reasonable terms for sport and recreational use, that there is no demand for the existing facility or alternative sport and recreation facilities which could be met on the site.

2. The provision of new sport and recreation facilities will be encouraged:

- where they provide flexible space to accommodate a range of different uses/users and are accessible to all;
- in locations which are convenient to the communities they serve, including open spaces;
- near existing residential areas;
- as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses;
- where they will not cause undue disturbance to neighbouring occupiers.

3. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

Reason for the policy

4.1.43. There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities within office developments and some hotels. The rapid growth in the working population, as well as the increasing recognition of the importance of healthy lifestyles, means there is a continued demand for these facilities.

How the policy works

4.1.44. While such facilities are important in meeting sport and recreational needs, it will not always be necessary to prevent their change of use, due to the fluid nature of the private market. However, any proposals involving the loss of sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance.

4.1.45. Open spaces and publicly accessible rooftops can provide valuable sports and recreational facilities in the densely built City environment.

Policy HIC8: Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas where a need has been identified, by:

- protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- requiring external play space and facilities as part of major new residential developments;

- where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or financial contributions to enable the provision of facilities elsewhere;
- promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.

2. Play areas and facilities must be inclusive and not be located in areas of poor air quality due to the negative health impacts on young children.

Reason for the policy

4.1.46. Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play.

How the policy works

4.1.47. Due to the City's large working population there are opportunities to create informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

4.1.48. Public realm spaces should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. The City Corporation plans to provide appropriate sensory play areas in the City for children and young people with special educational needs.

4.2. Safe and Secure City

Context

4.2.1. The City is a safe place to live, work and visit, with low rates of crime. The continuing security and safety of the City is key to its success, whether as a base for a company, a place to live or somewhere to spend leisure time. As a world leading financial and business centre, addressing potential risks from fraud, terrorism and cyber crime is of critical importance.

4.2.2. The City has its own police force, which enables it to focus on the City's specific circumstances while playing a leading national role in combatting economic and cyber crime. The City of London Police publish a three-year Policing Plan, updated annually, which sets out priorities that address both its national and local obligations. Current priorities are:

- Counter terrorism;
- Cyber crime;
- Fraud;
- Vulnerable people;
- Roads policing;
- Public order;
- Violent and acquisitive crime.

4.2.3. The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership's vision is for the City of London to be a safe place to live, work, visit, study and socialise. The Partnership meets regularly and publishes an annual strategy document, which identifies key priorities. These currently comprise:

- Supporting the Counter Terrorism Strategy through delivery of the Prevent Strategy;
- Violence against the person;
- Acquisitive crime;
- Night time economy crime and nuisance;
- Anti-social behaviour.

4.2.4. The City is home to the Central Criminal Court at the Old Bailey, the Rolls Building court complex, the Mayor's and City of London Court, the City of London Magistrate's Court and The Inner and Middle Temples Inns of Court, together with a number of legal firms.

Strategic Policy S2: Safe and Secure City

The City Corporation will work with the City of London Police to ensure that the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently by:

1. Minimising the potential for crime and anti-social behaviour by encouraging a mix of uses and natural surveillance of streets and spaces;
2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
4. Taking account of the need for resilience in developments so that residential and business communities are better prepared for, and better able to recover from emergencies (including the promotion of business continuity measures).

Reason for the policy

4.2.5. Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation not only between the City Corporation and the City of London Police, but also between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London. Close working with developers and occupiers is also essential.

How the policy works

4.2.6. Security features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the development process or following completion. Early engagement with the City Corporation and the City of London Police is particularly important.

4.2.7. The design of a scheme should create safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience.

Policy SSC1: Crowded Places

All major developments are required to satisfy the principles and standards that address the issue of crowded places and counter-terrorism by:

- Conducting a full risk assessment;
- Undertaking early consultation with the City of London Police on risk mitigation measures;
- Restricting or rationalising motor vehicle access where required; and
- Ensuring that public realm and pedestrian permeability is not adversely impacted, and that the design of the development considers the application of Hostile Vehicle Mitigation measures at an early stage.

Reason for the policy

4.2.8. Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.

4.2.9. Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development, the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism.

4.2.10. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach. Other measures that have been taken in the City include, the City of London Traffic Environmental Zone, which is the security and surveillance cordon that surrounds the Square Mile. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City. In 2016, the City Corporation also approved an Anti-Terrorism Traffic Regulation Order (ATTRO), a counter-terrorism measure that allows the City of London Police to close routes at certain times, specified in the order, and divert vehicles away from the area to deal with identified threats. Its purpose is to avoid or reduce the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism.

How the policy works

4.2.11. A risk assessment should be submitted for approval by the City Corporation as part of a planning application or transport proposal which includes:

- Assessment of the risk of structural damage from an attack;
- Identification of measures to minimise any risk;
- Detail on how the perimeter is treated, including glazing;
- Consideration of adjacent land-uses and commuter routes.

4.2.12. The City Corporation will liaise with the City of London Police in considering and approving risk assessments submitted as part of a planning application.

Policy SSC2: Dispersal Routes

1. Applications for major commercial development and developments which propose night-time uses should include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of people, minimise the potential for over-crowding and reduce the instances of anti-social behaviour.

Reason for the policy

4.2.13. The City increasingly operates on a 24-hour, 7 day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

4.2.14. The City's daytime population places pressure on the City's public realm at peak times. It is therefore necessary to provide details of dispersal routes as part of planning applications for major commercial developments to understand their implications for movement and amenity.

How the policy works

4.2.15. The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy C4: Evening and Night-time Economy.

4.2.16. New major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid over-crowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.

4.2.17. A Management Statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. Assessment of the Management Statement will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

Policy SSC3: Designing in Security

1. Security measures must be incorporated into the design of development at an early stage avoiding the need to retro-fit measures that adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. All development should be designed to minimise the need for Hostile Vehicle Mitigation on the public highway. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments.
4. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
5. All security measures which are expected to be more than very short-term should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design.
6. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.

Reason for the policy

4.2.18. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage.

How the policy works

4.2.19. All new developments must incorporate appropriate security provision to reduce the risk and the likely impact of an attack. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features for individual buildings on the public highway should be a last resort when all other alternative proposals have been exhausted including the scope for an area-based approach.

4.2.20. A collective approach to security is likely to be more effective than an individual building approach, particularly in areas of high-density development such as the City Cluster. Measures to enhance collective security measures when designing major developments will be welcomed.

- 4.2.21. In considering the impact of new development on the public realm, the City Corporation will take into account the need for additional security measures within the public realm to reduce the risk to individuals from motor vehicles and the potential for vehicles to mount pavements. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments.
- 4.2.22. Developments should aim to achieve a high level of natural surveillance of all surrounding public areas including the highway. Mixed use developments can generate greater activity and surveillance, but a mix of uses within individual buildings may give rise to problems of security, management and amenity. The provision of independent primary and secondary access points will be required so that proposed uses are separate and self-contained.
- 4.2.23. Early engagement with the City of London Police and the City Corporation is essential. Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.
- 4.2.24. Design and Access Statements should incorporate recommendations from the City of London Police, City Corporation and 'Secured by Design' principles or equivalent, setting out how security has been considered at the design stage. Advice in the City Corporation's Public Realm Technical Manual should be incorporated into proposals to ensure developments offer a lasting contribution to the streets and spaces of the City.

4.3. Housing

Context

- 4.3.1. The permanent residential population of the City, estimated to be around 7,400, is small in comparison to the daily working population in excess of 480,000. The GLA's 2016 projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 10,000 by 2036. When the City's housing stock increases the resident population does not increase in proportion as many residential units are used as second homes or for temporary sleeping accommodation. The 2011 Census indicated that there were 1,400 second homes in the City of London.
- 4.3.2. The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential clusters are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units developed in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2016. There have also been a number of developments providing shorter term accommodation (short lets or serviced apartments).
- 4.3.3. Most new residential development has been located in or near existing residential areas in accordance with Local Plan policy. This allows greater opportunity to protect residential amenity and deliver a high-quality residential environment. Residential clustering reduces potential conflict with commercial and office uses, and the areas are more easily serviced with facilities required by residents.
- 4.3.4. References to housing in this Plan include market, intermediate and affordable housing, hostels, sheltered and special needs housing. Student housing is addressed separately.

Housing requirement

- 4.3.5. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is, however, required to be in conformity with the London Plan, which sets an annual housing target for the City and the London boroughs. The draft London Plan 2017 requires the City of London to deliver 146 new homes each year during the period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. The draft London Plan 2017 also included a target that an annual average of 74 units should be provided on small sites of less than 0.25 hectares in size.
- 4.3.6. The City's 2016 SHMA assessed the level of housing need over the period 2014-36, using the latest population and household projections, and identified an objectively assessed need for an annual average of 126 dwellings per year.

4.3.7. The City Corporation aims to deliver around 900 new homes on City-owned land and housing estates by 2025, with potential for up to 3,000 further new homes on other sites delivered in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs. The City Corporation considers that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the City's SHMA. This draft Local Plan therefore seeks to meet the draft London Plan housing target of 146 dwellings per year.

4.3.8. The City Corporation's Housing Trajectory shows that the supply of small windfall sites, together with large sites in the development pipeline, will provide sufficient capacity to meet the London Plan annual average monitoring target of 146 additional homes per year (see Figure 7: City of London Housing Trajectory 2018 below). It is anticipated that there will be a sufficient supply of housing to achieve London Plan targets up to at least 2026 on the basis of sites in the development pipeline and past trends.

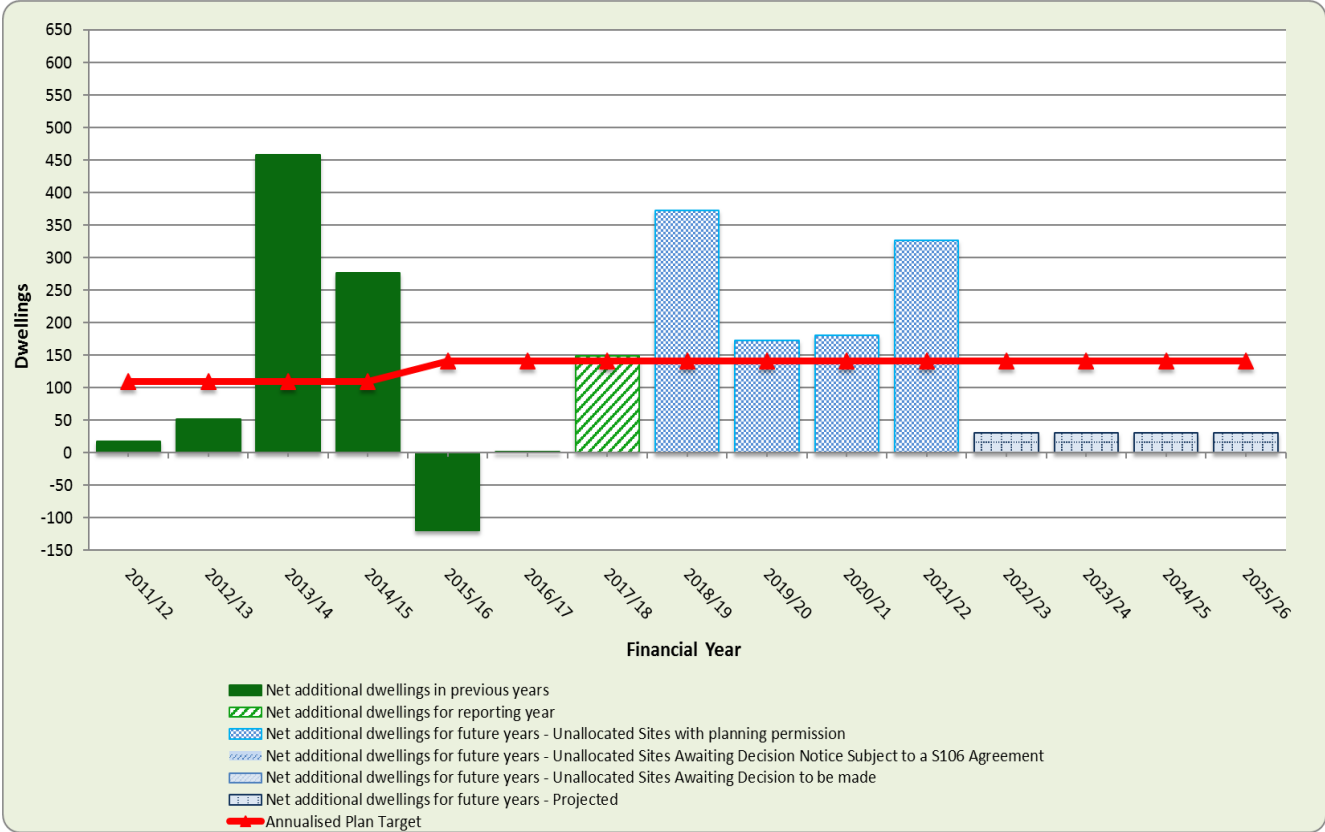


Figure 7: City of London Housing Trajectory 2018

4.3.9. The size and commercial character of the City mean that new housing development has been delivered through 'windfall' development rather than through the allocation of sites. Past evidence demonstrates that the reliance on windfalls has delivered a steady stream of new housing, meeting and exceeding target requirements. It is anticipated that windfalls will continue to deliver the majority of housing.

4.3.10. The Mayor of London prepares a Strategic Housing Land Availability Assessment (SHLAA) for London, providing guidance on the amount of land potentially available in the City for residential development. The City Corporation has also published a brownfield land register on its website, identifying land that is suitable for residential development in accordance with government requirements.

4.3.11. The City Corporation will continue to support the delivery of new market and affordable housing on its own housing estates and other appropriate land holdings outside the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London's wider housing needs.

Affordable Housing

4.3.12. The City of London is an expensive area to live in. The SHMA shows that the affordability ratio of lower quartile house prices to lower quartile earnings in 2013 was 13.44, the seventh highest in London and significantly above the national average of 6.45, or the inner London average of 10.00. Rental prices in the City were also significantly above the London-wide average or the average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests a need for an additional 69 affordable dwellings per year to meet affordable housing needs.

Gypsy and traveller accommodation

4.3.13. The draft London Plan indicates that, in the absence of an up to date local gypsy and traveller needs assessment, needs should be assessed using the mid-point figure of need in the GLA's 2017 Gypsy and Traveller Accommodation Topic Paper. This indicated that there is no need for specific gypsy and traveller accommodation in the City of London. This assessment is consistent with earlier assessments undertaken by the Mayor.

Strategic Policy S3: Housing

The City Corporation will protect existing housing and amenity and provide additional housing in the City concentrated in or near identified residential areas to meet the City's needs. This will be achieved by:

1. Making provision for an annual requirement of 146 additional residential units in the City up to 2036:

- guiding new housing development to sites in or near identified residential areas;
- protecting existing housing where it is of a suitable quality and in a suitable location;
- exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity;
- refusing new housing outside the residential areas which would prejudice the primary business function of the City or be contrary to Policy O2.

2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by requiring residential developments with the potential for more than 10 units to:

- provide a minimum of 35% affordable housing on-site;
- exceptionally, provide 60% of affordable housing off-site, or equivalent cash-in lieu, if evidence is provided to the City Corporation's satisfaction that on-site provision is not feasible and viable;
- provide a mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.

3. Requiring a publicly-accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.

4. Requiring 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 90% of new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Reason for the policy

4.3.14. London has a severe housing shortage caused by a growing population and inadequate supply of housing units. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still ensuring that the City remains predominantly a commercial office centre of national importance.

4.3.15. New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Housing located in the City can address local housing need and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.

4.3.16. The London Plan includes a detailed policy which supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting and is typically owned by institutional investors and will be supported where it meets the detailed requirements in the London Plan

How the policy works

- 4.3.17. There is a presumption in national policy and the London Plan that new affordable housing should be provided on site. The City Corporation will expect developers to deliver affordable housing on new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable.
- 4.3.18. Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace. The City Corporation therefore works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. However, the presumption in this Plan is that affordable housing should be provided on site.
- 4.3.19. The City Corporation requires commercial development to make a financial contribution towards affordable housing delivery instead of delivering mixed use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.
- 4.3.20. The draft London Plan and the Mayor's adopted Affordable Housing and Viability Supplementary Planning Guidance set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m². Schemes which meet or exceed 35% affordable housing are not required to submit viability information.
- 4.3.21. In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. In exceptional cases where off-site provision or cash in lieu contributions is considered to be acceptable in principle, 60% affordable housing will be sought to avoid creating a financial benefit to the applicant relative to on-site provision. Further guidance on affordable housing requirements, including the level of cash-in lieu or offsite contributions required are set out in the City Corporation's Planning Obligations SPD. This SPD will be kept under review and periodic adjustments made to required levels of financial contribution in light of evidence of changes in the cost of delivering affordable housing.
- 4.3.22. Developments which propose lower levels of affordable housing will need to be supported by robust viability assessments. These assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will also commission an independent review of submitted assessments, with the cost of this review being

met by the applicant. Consideration of viability and overall levels of affordable housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.

- 4.3.23. The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. If a developer overpays for a site, this will not be regarded as an appropriate justification for failing to meet the affordable housing target.
- 4.3.24. Where a viability assessment demonstrates that the Plan's affordable housing targets cannot be met, the City Corporation will normally require an upwards only review mechanism to be included within any s106 planning obligation to ensure that any increases in scheme value or reduction in cost are appropriately reflected in increased affordable housing contributions. The detailed wording and timing of these review mechanisms will be determined on a case by case basis, having regard to City Corporation Supplementary Planning Guidance and guidance prepared by the Mayor in support of the London Plan.
- 4.3.25. Various types of affordable housing products are included within the national definition of affordable housing. The draft London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix.
- 4.3.26. The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible.

Policy H1: Location of New Housing

1. New housing will be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential, commercial and other uses will be permitted.

2. New housing must not:

- prejudice the primary business function of the City, or result in the loss of viable office accommodation, contrary to Policy O2;
- inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
- result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

3. Where existing residential estates are being redeveloped, the existing affordable housing on-site must be reprovided with at least the equivalent floorspace and tenure of affordable housing. Affordable housing which is reprovided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.

Reason for the policy

4.3.27. The City is a busy and sometimes noisy place, with a high density of development and business activity 24 hours a day, 7 days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because they could have an adverse impact on the City's primary business role and its ability to operate 24/7 and would be likely to have poor residential amenity. The draft London Plan indicates that residential development is inappropriate in defined parts of the City to ensure that the current and future potential to assemble and deliver office development is not compromised by residential development. Elsewhere in the City, offices and other strategic functions of the Central Activities Zone should be given greater weight than residential development, except in wholly residential streets or predominantly residential neighbourhoods.

4.3.28. The City's policy approach is therefore to locate new housing within or near the existing residential areas shown in **Error! Reference source not found.8**, where reasonable residential amenity consistent with a central London location can be achieved. This approach helps to minimise disturbance to residents within the clusters, while reducing potential conflict with the development and operation of commercial uses.



Figure 8: Residential Areas

4.3.29. Due to the size and unique character of the City, all new housing has come forward on 'windfall' brownfield sites through the redevelopment or conversion of

existing buildings as opportunities arise. There has been no need to allocate sites in the Local Plan to meet housing targets and this pattern of housing delivery is projected to continue throughout the life of this new Plan.

How the policy works

4.3.30. To accord with policy O2, applicants proposing the redevelopment or change of use of existing office accommodation must provide robust evidence to demonstrate that the site is not suitable and viable for office use and the proposal will not prejudice the primary business function of the City. Within or near the residential areas, if the City Corporation is satisfied that the loss of an office site is justified by the evidence provided, then redevelopment to provide residential use may be appropriate. Further details are set out in the Office Use SPD.

4.3.31. Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted which demonstrates how the development will mitigate the impact of noise and pollution.

4.3.32. Regeneration of housing estates will often involve the redevelopment of existing homes. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. This will help protect established local communities.

Policy H2: Loss of housing

The net loss of existing housing units will not be permitted except where:

- they provide poor amenity to residents which cannot be improved;
- they do not have a separate entrance;
- large scale office development would be prejudiced by the retention of isolated residential units; or
- exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

Reason for the policy

4.3.33. The net loss of existing housing will be resisted because of the limited opportunities to replace that housing stock in the City. Exceptionally the net loss of existing housing may be acceptable, particularly outside residential areas where the development of offices will have a significant beneficial impact for the City. Isolated residential units can suffer poor amenity and can be adversely affected by the operation of the business City. Housing units outside identified residential areas are more likely to suffer noise nuisance and other disturbance due to non-residential uses in close proximity, including clubs and pubs.

Policy H3: Residential environment

1. Within identified residential areas, the amenity of existing residents will be protected by resisting uses which would cause unacceptable noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause undue disturbance.
1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity.
2. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
3. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials, in accordance with the 'Agent of Change' principle. This principle is also applicable when new housing proposals might otherwise constrain existing uses.
4. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Reason for the policy

4.3.34. The City is predominately a centre of business, with activity taking place 24 hours a day, 7 days a week. This sometimes results in noise and disturbance to residents from new commercial development and commercial activities nearby. While the City Corporation will endeavour to minimise noise and other disturbance to residents it is inevitable that living in such a densely built-up area will result in some disturbance from a variety of sources.

4.3.35. The avoidance of overlooking of residential accommodation is a consideration in the design and layout of both new residential buildings and other development. However due to the density of development in the City avoidance of overlooking may not always be possible.

How the policy works

4.3.36. The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas. Policy C4 addresses evening and night-time economy uses.

4.3.37. New residential development will also be subject to the Agent of Change principle and should include sufficient mitigation to ensure that the amenity of prospective owners or tenants is not compromised by existing uses in the vicinity.

Policy H4: Housing quality standards

All new housing must be of a high-quality design and a standard that facilitates the health and well-being of occupants and neighbouring occupants, and:

- meets London Plan housing space standards;
- meets standards for Secured by Design or similar certification;
- maximises opportunities for providing open and leisure space for residents.

Reason for the policy

4.3.38. All new housing will be expected to provide well designed, high quality living environments, both internally and externally, incorporating principles of inclusive, secure and sustainable design.

How the policy works

4.3.39. Housing development should comply with the requirements in the London Plan and the Mayor's London Housing Design Guide, unless it would not be feasible to do so because of site specific factors. The layout should incorporate sufficient space and facilities for waste and recycling bins.

4.3.40. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy DMXX,. Daylight and sunlight to dwellings is addressed in the Design section of the Plan.

Policy H5: Short term residential letting

1. Short term residential letting of domestic premises for over 90 days in a calendar year will not normally be permitted as such a change of use would reduce the stock of permanent housing in the City and may adversely impact the amenity of existing residents.
2. Short term residential letting for commercial purposes will not be permitted unless the units are contained within a block built for this purpose and will not be permitted if mixed with permanent residential accommodation within the same building.
3. Where short term residential letting is permitted for commercial purposes, conditions will be imposed to prevent any later changes to permanent residential use in unsuitable accommodation or locations.

Reason for the policy

4.3.41. Under the Deregulation Act 2015, short term residential letting of domestic premises which are liable for council tax for less than 90 days in a calendar year does not require planning permission. Letting for periods of more than 90 days will require permission.

How the policy works

4.3.42. Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and may adversely impact on the amenity of existing residents.

4.3.43. Short term residential letting of a non-domestic property for commercial purposes can help to meet the accommodation needs of business visitors and may be suitable within identified residential areas. Such residential letting can have significant impacts on the amenity of neighbours by reason of noise, disturbance, and occasionally anti-social behaviour. For this reason, where such accommodation is proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.

4.3.44. The requirement for the provision of affordable housing in Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

4.3.45. Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy H1.

Policy H6: Student housing and hostels

1. Proposals for new student accommodation and hostels will be refused where they would:

- prejudice the primary business function of the City, or result in the loss of office buildings or sites, contrary to Policy O2;
- result in an excessive concentration of student housing and/or hostels;
- have an adverse impact on the residential amenity of the area;
- involve the loss of permanent residential accommodation.

2. Proposals for Purpose-Built Student Accommodation (PBSA) must be supported by identified further or higher educational institutions operating in the City of London or the Central Activities Zone and must provide accommodation for their own students.

3. 35% of student housing on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.

4. The loss of existing student housing and hostels to other suitable uses which are in accordance with other Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is evidence that student accommodation is impacting on residential or business amenity.

Reason for the policy

4.3.46. The demand for student accommodation in London continues to grow. However, the City is primarily a commercial area and opportunities for residential development are limited. Student housing may represent an opportunity lost for other housing needs in residential areas.

How the policy works

4.3.47. New Purpose-Built Student Accommodation (PBSA) will only be permitted when supported by an identified further or higher educational institution for the housing of its own students. A Section 106 agreement will be required which limits occupation to students studying at the stated further or higher education institution, in or near the City.

4.3.48. Every three student bedrooms in PBSA that are completed equate to meeting the same housing need as one conventional housing unit and contribute to meeting the City's housing target at the ratio of three bedrooms being counted as a single home.

Policy H7: The Temples

Within the Temples adjustments between professional and residential accommodation will be permitted where:

- the overall balance of residential and professional chambers is maintained;
- it is important to the functioning or character of the Temples, or to the continuing use of their buildings.

Reason for the policy

4.3.49. The Inner and Middle Temples are two of the Inns of Court which provide accommodation for the legal profession in the south west of the City between

4.3.50. Fleet Street and the River Thames. Along with other nearby Inns of Court and the Royal Courts of Justice in Westminster, the Temples form part of a specialist legal cluster which is recognised in the London Plan.

4.3.51. The Temples mainly contain barristers' chambers, together with other buildings for Members of the Bar. The Inner and Middle Temples have a strong collegiate atmosphere due to the mix of residential and commercial uses. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

How the policy works

4.3.52. In determining applications, the City Corporation will have regard to the importance of the continued existence of a residential and office element in the Temples and the contribution that this makes to their special character. However, the need of the Temples to rationalise and refurbish chambers in order to maintain an efficient business and professional community is recognised.

Policy H8: Older persons housing

1. The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people:

- supporting development that meets the specific needs of older people;
- supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
- resisting development that involves the net loss of housing for older people.

Reason for the policy

4.3.53. The City of London has an ageing resident population profile, in line with national demographic trends. The City of London SHMA identifies a need for 67 older person units over the life of the Plan, and the London Plan has an indicative figure of 10 units per year.

How the policy works

4.3.54. The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet needs identified in the City of London SHMA.

Policy H9: Self and custom housebuilding

The City Corporation will encourage developers to consider the potential for self and custom build units within residential schemes.

Reason for the policy

4.3.55. The Self Build and Custom Housing Building Act 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The City Corporation launched its own register for prospective self-builders in 2016.

How the policy works

4.3.56. There are no large areas of unused land in the City of London that would provide an opportunity to create serviced building plots. Furthermore, self-build and custom-build are likely to involve low density development, which would

conflict with policies in the Plan which seek to maximise housing supply. Given these constraints, the City Corporation considers that the best prospect for bringing forward suitable land will be in conjunction with large housing developments where units can be built to shell and core and individually fitted out.

5. Support a Thriving Economy

5.1. Offices

Context

- 5.1.1. The City is London's historic business core and today represents the largest concentration of office-based employment in the capital. It forms a world leading international financial and professional services centre, renowned for its financial, insurance and legal sectors which are the main office occupiers. However, the City is evolving, with a rapid increase in serviced offices and co-working providers, which offer more flexible workspace options and attract a more diverse range of occupiers including technology and media companies.
- 5.1.2. The whole of the City forms the business cluster and is suitable for further commercial development. There are, however, residential clusters within the City where a mixture of residential and commercial uses will be permitted (see Policy S3).
- 5.1.3. The City was home to 17,980 businesses and 483,000 workers in 2016 and employment is projected to continue to grow over the long term. Over 98% of all the City businesses are Small and Medium Enterprises (SMEs) with fewer than 250 employees; 80% have fewer than 10 employees.
- 5.1.4. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The agglomeration, or clustering, of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business.
- 5.1.5. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects that employment in the City of London will grow by 116,000 from 2016 to 2036, of which approximately 103,000 are estimated to be office based. London's rapidly growing population will also create the demand for more employment and for the space required to accommodate it.
- 5.1.6. The United Kingdom's exit from the European Union will have short and long-term effects on economic and employment growth depending on the detailed arrangements to be agreed. Whatever those arrangements London's strong underlying strengths mean that it is necessary to plan for continued growth to ensure that the City remains a global financial and business centre.

Strategic Policy S4: Offices

The City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by:

1. Increasing the City's office floorspace stock by a minimum of 2,000,000m² net during the period 2016 to 2036, to meet the long-term economic needs of the City and accommodate projected employment growth, phased as follows:

- 2016 – 2021 750,000m²
- 2021 – 2026 750,000m²
- 2026 – 2031 250,000m²
- 2031 - 2036 250,000m²

2. Ensuring that new floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the need for a variety of workspace types suitable for SMEs, start-up companies and those requiring move-on accommodation.

3. Encouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City.

4. Protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City.

Reason for the policy

5.1.7. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 2,000,000m² is derived from the estimated growth in office employment between 2016 and 2016. Details of the floorspace calculation are set out in the City Corporation's Office Floorspace Target Evidence Document.

5.1.8. In 2016, 25% of take-up of office floorspace in the City of London was from "Media and Tech" firms, compared to 28% from "Financial" companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. This broader range of occupiers is creating requirements for a broader range of office types as a response to changes in the market.

5.1.9. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses and help to grow both the City and the wider London economy.

5.1.10. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers.

How the policy works

5.1.11. Policy CS1 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.

5.1.12. The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the Policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first 2 phasing periods. It is expected that 75% of the floorspace target will be achieved by 2026, with the remaining 25% in the latter phases.

5.1.13. The City Corporation has made an Article 4 Direction which will come into force on 31 May 2019. This Direction removes permitted development rights for the change of use of offices (B1a) to dwellinghouses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan and with the national exemption from permitted development rights, which has operated in the City of London since May 2013 and been extended to 30 May 2019.

Policy O1: Office Development

1. Office development should:

- Be of an outstanding design and an exemplar of sustainability; and
- Be designed for future flexibility to allow for sub-division and amalgamation of floorplates to future proof the City's office stock; and
- provide office floorspace suitable for a range of occupiers; and
- provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.

2. Other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for its businesses, workers and residents which contribute to the City's economy.

Reason for the policy

5.1.14. A range of office floorspace is required to accommodate the future needs of the City's office occupiers and this should include provision for incubator, co-working and accelerator space, as well as provision for larger firms where

required. Flexible office floorspace is required that can be easily adapted to meet changing workplace and technology requirements and the needs of a variety of office occupiers.

5.1.15. Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City's economy include retail, leisure, education and health facilities. A mix of commercial land uses, in particular at ground floor and basement levels, creates active frontages enhancing an area's vitality and providing important complementary services particularly to the City's working community.

How the policy works

5.1.16. Proposals for new office development should demonstrate design quality and flexibility to accommodate a range of businesses. Particular encouragement will be given to floorspace which meets the needs of small businesses, start ups and incubator space. Office development should include a suitable mix of complementary commercial or other uses appropriate to the site and location and contribute to the creation of active frontages at street level.

Policy O2: Protection of Existing Office Floorspace

The loss of existing office floorspace will be resisted unless it can be demonstrated that:

- there is no demand in the office market, supported by marketing evidence covering a period of no less than 18 months;
- refurbishment or re-provision of office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; and
- a mixed-use commercial redevelopment providing a reduced amount of better quality office space has been considered and its viability evaluated.

Where the above criteria have been met, the loss of office floorspace may be permitted provided that the proposed development would not compromise the potential for office development on sites within the vicinity and would have demonstrable wider benefits for the business City.

Reason for the policy

5.1.17. The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the increase in demand for office floorspace, it is important to maintain existing office stock whilst accommodating future demand through the provision of flexible floorspace which is suitable for a range of occupiers.

5.1.18. The protection of existing offices is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential

occupiers. Proposals involving the loss of office accommodation will need to be supported by robust evidence of need and viability to ensure that viable offices can be retained to meet future office need.

5.1.19. Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy D1 and the need to find suitable and sustainable uses for historic buildings. Historic buildings can provide affordable office stock though they have specific constraints and opportunities which may affect refurbishment scheme viability.

How the policy works

5.1.20. To support proposals for the loss of existing office floorspace, applications must demonstrate that there is no demand for refurbished or new offices, or an office-led mixed-use development. Where a proposal results in a reduced amount of office floorspace, account will be taken of the type and size of office floorspace provided and if there is a specific need for office floorspace of that size and type in the City.

5.1.21. The change of use of office floorspace at ground and lower ground levels can improve the vibrancy of an area by introducing more active frontages and will be supported where it does not prejudice the use of the building or site for office purposes. The loss of office floorspace on the upper levels of buildings is of particular concern and robust evidence will be required to demonstrate why such spaces cannot be used for office use.

5.1.22. Where the loss of office floorspace is proposed, this should be accompanied by robust evidence of marketing of the building or site for continued office use over a period of at least 18 months. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site. Information should be provided which details the number of viewings/interested parties, and comments regarding the suitability of the site/building. Proposals must also be supported by evidence that the continued office use of the site would be unviable in the longer term.

5.1.23. Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances. As part of a viability assessment, the following information should be included:

- Site description;
- A valuation of the building in its existing use unfettered by any hope value;
- Total costs of maintaining the building as existing and in the future;
- Costs of refurbishing or redeveloping the building for office use;
- Information on rents and capital values;
- Information on current and recent occupation;

- Target rates of return (internal rate of return or other appropriate measure); and
- Sensitivity testing to support the robustness of the report conclusions.

5.1.24. Where evidence demonstrates that continued office use is unviable, alternative uses will be considered in line with the policies in the Local Plan. Demonstration that office use is not viable will not, on its own, provide the necessary justification for the proposed alternative use.

Policy O3: Temporary ‘Meanwhile’ Use of Offices

1. Temporary use of vacant office buildings and sites (‘meanwhile’ uses) will be permitted where the proposed use would not result in adverse impacts on the amenity of the surrounding uses or the primary business role of the City. Permission will be granted for a period not exceeding 36 months and the site will revert to office use thereafter.
2. Residential development is not considered an appropriate meanwhile use and will not be permitted.

Reason for the policy

5.1.25. Where office buildings or sites are vacant, and development is not expected in the short term, ‘meanwhile’ or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained subject to their impact on surrounding uses.

How the policy works

5.1.26. ‘Meanwhile’ uses will be granted for a maximum of 36 months, after which the use will revert to office use. This time period will be set out in conditions attached to any planning permission granted. Applications to extend the period of the ‘meanwhile’ use or make it permanent will not be permitted unless it is demonstrated that there would be no adverse impact on the business City and that the loss of office floorspace is acceptable.

5.2. Retailing

Context

- 5.2.1. Retailing provides an important service for all the City's communities – but retail demand is largely driven by City workers. The predominance of workers in the City has resulted in a five-day (Monday-Friday) trading week with footfall concentrated over weekday rush hours and lunch times. Several locations also cater for week-end and evening trade; this trend has been growing is necessary to ensure that the City becomes a 24 hour, 7 day a week destination.
- 5.2.2. There is demand for a better range and quality of retail and leisure facilities. The above average spending power of the City's growing working and residential populations, longer and extended working and trading hours, the increasing number of visitors and the Square Mile's high accessibility by public transport create significant opportunities for improvement to the retail offer.
- 5.2.3. The ways in which people shop and use retail facilities is changing and the City's retail offer needs to adapt to address changing consumer and leisure habits.

Strategic Policy S5: Retailing

The City Corporation will seek to improve the quantity and quality of retailing and the retail environment, promoting the development of the four Principal Shopping Centres (PSCs) and the linkages between them by:

1. Focusing new retail development in the PSCs and encouraging movement between them by enhancing the retail environment along Retail Links.
2. Supporting proposals that contribute towards the delivery of 196,000 m² gross of additional retail floorspace across the City to meet future demand up to 2036.
3. Requiring major shopping developments to be located within or near PSCs. Where suitable sites cannot be identified within PSCs, sites immediately adjoining the PSCs and in Retail Links should be considered. Other areas of the City will only be considered where no suitable sites are identified within or adjoining the PSCs and Retail Links.
4. Requiring a Retail Impact Assessment for schemes of 2,500m² and above outside PSCs. The cumulative impact of retail floorspace will be taken into account in the assessment of planning applications.
5. Giving greater priority to shops (A1 uses) within the PSCs, with a broader mix of retail uses on the peripheries of the centres and the Retail Links.
6. Supporting the provision of retail uses that provide active frontages at street level across the City where they would not detract from the viability and vitality of the PSCs and the Retail Links.

Reason for the policy

5.2.4. Four Principal Shopping Centres (PSCs) have been identified which provide a variety of comparison and convenience shopping within the City of London: Cheapside, Moorgate/Liverpool Street, Fleet Street and Leadenhall Market. Cheapside is considered to be the City’s ‘high street’ and has seen the most significant retail development in recent years. Liverpool Street/Moorgate PSC has significant potential to accommodate further retail floorspace, capitalising on the opening of the Elizabeth Line and becoming a key retail destination.

5.2.5. The PSCs are recognised in the London Plan as ‘CAZ Retail Clusters’ that accommodate a range of other commercial uses alongside the retail function. Beyond the PSCs, retail units are more dispersed across the City though many are on streets identified as Retail Links (see **Error! Reference source not found.**), while others form convenient local centres or are isolated units.



Figure 9: Principal Shopping Centres and Retail Links

How the policy works

5.2.6. There are further opportunities to develop the City’s retail offer, allowing for a broad mix of retail facilities while maintaining a predominance of A1 retail use. The role and status of the four PSCs will be strengthened, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to pedestrian links and the retail offer within the Retail Links will encourage shoppers to move between the PSCs.

5.2.7. Major retail development should locate within PSCs, but where suitable sites are not available should consider sites on the edge of the PSCs or the identified Retail Links. Smaller scale retail uses will be encouraged throughout the City, where they provide an active frontage and facilities which meet the needs of the City's working population or provide for the needs of local residents. Particular encouragement will be given to A1 uses near to residential areas.

5.2.8. Active frontages should be provided at street level across the City. Retail uses may be permitted on upper floors of major commercial developments, including in tall buildings, providing that the loss of office floorspace is acceptable under Policy O2.

5.2.9. The floorspace target in Policy S5 is based on a Retail Needs Assessment which identified a need for 196,000 m² of additional retail floorspace up to 2036. The Assessment identifies the potential for significant retail growth in and around the PSCs, with a focus on potential growth around Moorgate/Liverpool Street. Some growth is also anticipated to come forward outside the PSCs, near them or along the Retail Links.

Policy R1: Principal Shopping Centres

1. Principal Shopping Centres (PSCs) are defined as designated frontages on the Policies Map. Sites or buildings that contain a designated frontage are considered to be part of the PSC in their entirety.

2. Within PSCs the loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged. Proposals for changes between retail uses within the PSCs will be assessed against:

- the contribution the unit makes to the function and character of the PSC; and
- the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

3. Proposals for the change of use from shops (A1) to other Class A uses at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre or amenity.

Reason for the policy

5.2.10. The frontages of the four PSCs are defined on the Policies Map. Concentrating major new retail development in or near PSCs will ensure that their vitality and viability is maintained and will provide an opportunity to focus retail facilities in the most appropriate areas of the City, enhancing these as shopping destinations for City residents, workers and visitors. In accordance with the definition of PSCs set out in this policy, a sequential or retail impact assessment will not be required for retail development on any site or building that contains a designated frontage.

5.2.11. Retailing comprises shops (A1), financial and professional services such as banks (A2), restaurants and cafes (A3), drinking establishments (A4) and hot food takeaways (A5). When considering proposals for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, units that are large or in prominent locations should be retained in A1 use.

How the policy works

5.2.12. The net loss of ground floor retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will be resisted. A1 units at upper floors and basement levels may contribute to the retail provision of PSCs. However, it is recognised that pressure on ground floor shop units may be reduced by locating other retail uses at non-ground level. Change of use from shops to other retail uses at upper floors or basements will be assessed in relation to the contribution the unit makes to the character of the PSC and the effect of the proposed entrance and use on the ground floor frontage. This policy refers to individual retail units facing PSC frontages and not to multi-level shopping centres.

5.2.13. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer. Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.

5.2.14. Each PSC in the City has an individual character which will be considered in the implementation of policy:

Cheapside

5.2.15. Cheapside is the largest PSC in the City and serves a wider catchment area than the other centres. The PSC includes Bow Lane and the ground floor of One New Change as well as Cheapside itself. The PSC has undergone significant redevelopment in recent years and the strategy now is to reinforce its role and character as the City's 'High Street', maintaining a clear predominance of A1 units with a focus on comparison goods and food and drinks provision. There is scope for greater weekend trading and for some additional retail floorspace, particularly to link the western part of Cheapside with Culture Mile. The Bank Junction highways and public realm improvements offer an opportunity to achieve greater pedestrian movement and retail links between Cheapside and retail activity within the Royal Exchange and further east.

Fleet Street

5.2.16. Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers and residents with a limited number of premises opening in the evenings or at weekends. The PSC has a linear form and the busy road acts as a barrier to pedestrian permeability. Improvements to the public realm would help to improve the visitor and shopper experience. The current retail stock is

largely A1 food retail, and there is an opportunity to capitalise on the comparatively lower rents, Fleet Street's outstanding heritage and development opportunities, to develop a more distinctive retail mix in this PSC. There is some capacity for additional retail provision between Fleet Street and Holborn and there is scope to strengthen retail links with Cheapside.

Leadenhall Market

5.2.17. Leadenhall Market PSC is centred on the iconic Victorian market building, but it also includes several surrounding streets. The PSC is located at the southern end of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The historic market building is also visited by a relatively high proportion of tourists and so evening and week-end trading is encouraged. The character of the historic market will be maintained and enhanced as a visitor and retail destination, supporting a flexible range of retail uses with an emphasis on food and drinks. Increased demand arising from the expanding workforce near the area will be met through larger, modern units in the surrounding streets which act as gateways to the market. Additional retail will also be provided by active retail frontages to new office development in the area.

Moorgate/Liverpool Street

5.2.18. Moorgate/Liverpool Street PSC is the second largest in the City but has a relative under-provision of comparison goods space compared to the City average. Retail demand in this PSC will increase due to the improved connectivity arising from the Elizabeth Line and development and refurbishment proposals in and around the Broadgate Estate, supported by further retail provision along routes between Liverpool Street and Moorgate stations. There is potential for the PSC to expand its 7-day a week role, capitalising on its strong transport accessibility, its proximity for inner London residents and to nearby visitor and cultural attractions such as the Culture Mile, Old Spitalfields Market and Petticoat Lane.

Policy R2: Retail Links

1. Within the Retail Links, the net loss of retail frontage and floorspace will be resisted and additional retail development will be supported. A mix of shops and other retail uses will be permitted in the Retail Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

Reason for the policy

5.2.19. Retail Links provide City workers and residents with important services and leisure facilities. Their purpose is to connect the City's PSCs as well as to provide connections to neighbouring boroughs' retail frontages, transport hubs, areas with high footfall and residential areas. Retail Links are a key part of the 40% of the City's existing retail stock found outside of the PSCs and they play a significant role in meeting demand particularly for day-to-day retail goods and services.

How the policy works

5.2.20. The Retail Needs Assessment Study identified the need for approximately 85,000m² of additional retail floorspace in the 'rest of the City' outside the PSCs. The Study highlighted two areas that should be a priority for new floorspace outside the PSCs: Farringdon/Culture Mile and Eastcheap/Monument. Delivery of new retail floorspace at Eastcheap/Monument could help to meet some of the demand arising from office development in the City Cluster which cannot be accommodated within the Leadenhall Market PSC and would also provide more vibrant links towards the Pool of London.

5.2.21. While the Retail Needs Assessment Study concluded that the Retail Links continue to play an important role in meeting demand, it advocated a different occupier mix in these areas compared to the PSCs in order to avoid drawing visitors away from the prime PSC streets. Comparison goods shopping should be focused in the PSCs to maintain the health of the City's core retail offer.

5.2.22. While the mix of uses in the Links should include A1 shops, a variety of other retail uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through noise, disturbance and odours.

Policy R3: Ground floor retail provision elsewhere in the City

1. Retail uses will be permitted at ground floor level providing they:

- include active frontages onto the street;
- do not impact adversely on the amenity of residents, workers and visitors;
- do not impact adversely on the operation of office premises; and
- would not adversely affect the vitality and viability of the PSCs or Retail Links.

2. The loss of A1 units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.

Reason for the policy

5.2.23. Retail units outside of PSCs and Retail Links provide local facilities for the City's workforce, enhance the City's vibrancy, and may serve the City's residential communities.

How the policy works

5.2.24. The provision of new retail units, particularly A1 units, at ground floor level in existing and new development will be supported where these units do not have an adverse impact on the operation of office premises, provide an active frontage onto the street and do not have an adverse impact on the amenity of residents, workers or visitors by reason of noise, smells or fumes from the operation of the unit or servicing and deliveries. Use of ground floors for retail

offers the opportunity to create more permeable buildings which can assist in reducing pressure for space on City streets.

Policy R4: Specialist Retail Uses

1. The City Corporation will seek to retain specialist retail uses and premises that are historically and culturally significant to the City of London.

Reason for the policy

5.2.25. Alongside the PSCs there are some specialist retail uses and premises within the City that cannot be found elsewhere, such as the historic Royal Exchange, and London Silver Vaults on Chancery Lane. These uses contribute to the City's visitor economy and to its cultural distinctiveness and should be retained and promoted.

How the policy works

5.2.26. The City Corporation will resist proposals which result in the permanent loss of specialist retail uses. Where redevelopment is proposed, the replacement of specialist facilities will be required.

Policy R5: Markets

1. Proposals for markets and temporary retail pop-ups will be permitted where they:

- are of an appropriate scale and frequency for their location;
- would not have a significant adverse impact on the vitality and viability of existing retail centres within or outside the City;
- would not have a significant adverse impact on the amenity of nearby residents or business occupiers; and
- would not unduly obstruct pedestrian and vehicular movement.

Reason for the policy

5.2.27. Street trading in the City is regulated by the City Corporation under the City of London Various Powers Act 1987 (as amended), which restricts permanent street trading but allows street trading to take place for temporary periods in specified locations. The exception is on Middlesex Street (Petticoat Lane) Market, which straddles the boundary between the City and Tower Hamlets, where licensed trading is permitted between 9am and 2pm on Sundays. Further information on licensing requirements is set out in the City Corporation's Street Trading Policy which is available on the Corporation's website.

5.2.28. Temporary street trading, where permitted under the Various Powers Act, can operate for up to 14 days in a calendar year under permitted development rights. Trading for longer periods will require planning permission. Market trading off City streets but within the curtilage of a building will similarly require planning permission if undertaken for a period of 14 days or more in a calendar year.

How the policy works

5.2.29. There is an increasing demand for temporary retail pop-ups and street food markets, such as the Guildhall Yard Lunch Market, which can support the local economy by generating increased vibrancy and footfall. When assessing proposals for new markets and pop-ups, the City Corporation will consider the potential for significant adverse impacts on existing retail centres within the vicinity, or on the amenity of nearby residents or business occupiers, or on pedestrian and vehicular movement.

5.3. Culture, Visitors and the Night-Time Economy

Context

5.3.1. London has long been recognised as one of the world's great cultural cities, but it is less widely known that the City of London contains a huge concentration of arts and cultural facilities, which contribute to the uniqueness of the Square Mile and complement the primary business function of the City. These facilities include galleries, theatres, museums, heritage attractions, Livery Halls, libraries, places of worship and concert halls. In recent years a growing number of night-time entertainment facilities such as clubs, bars and event venues have also located in the City, alongside the traditional historic public houses.

5.3.2. The City's cultural offer has become increasingly important and is now an integral element of the Square Mile, alongside the business City. The Barbican is identified as a Strategic Cultural Area in the London Plan and the City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section.

5.3.3. The City Corporation has prepared Visitor and Cultural Strategies that promote the City as a high-quality visitor destination with an emphasis on world-class cultural facilities. It is estimated there are approximately 18 million business and leisure visitors a year to the City and this is expected to continue to grow as a result of an increased cultural offer and improvements to transport accessibility such as the Elizabeth Line and Bank Station upgrade. Suitable facilities and hotel accommodation are required to provide visitors with a pleasant experience whilst in the City.

5.3.4. Art can contribute significantly to the quality of the environment and cultural experience, particularly where it enhances a sense of place. Public art can mitigate the impacts of development by the creation of works giving visual pleasure and helping to re-establish local identity and sense of place.

Strategic Policy S6: Culture, Visitors and the Night-Time Economy

The City Corporation will maintain and enhance the City of London's contribution to London's world-class cultural offer and the City's communities will be able to access a range of arts, heritage and cultural experiences by:

- Providing, supporting and further developing a wide range of cultural facilities across the City, and delivering a major destination for culture and creativity in the north west of the City through the Culture Mile initiative;
- Protecting existing cultural facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City;
- Allowing hotel development where it supports the primary business or cultural role of the City, and refusing new hotels where they would compromise the City's business function or the potential for future business growth;

- Enabling a vibrant evening and night-time economy, while proactively managing night-time entertainment premises to minimise potential disturbance to residents and workers;
- Maintaining the City's existing collection of public art and culturally significant objects and pursuing opportunities to commission new, high quality pieces in appropriate locations;
- Maintaining and developing the City's open spaces and streetscape to accommodate cultural events and activities that are accessible to all City communities and which celebrate the City's unique cultural offer.

Reason for the policy

5.3.5. The City's cultural infrastructure is important to the distinctive character of the Square Mile. The international reputation and high quality of this cultural activity has a critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business. It also helps to attract an increasing number of visitors, with consequent economic benefits, and supports the well-being of residents and workers.

How the policy works

5.3.6. The City Corporation will require proposals for new development and changes of use to protect existing arts and cultural facilities where they are needed and require appropriate replacement. The City Corporation will work with developers and cultural and arts institutions to deliver new facilities where they support the City's Culture Mile ambition or enhance the attractiveness of the City as a business and cultural destination.

5.3.7. Policy C1: Protection of Existing Visitor, Arts and Cultural Facilities

1. The City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless:

- replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
- the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
- it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2. Proposals resulting in the loss of visitor, heritage, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, heritage, arts or cultural use at reasonable terms for such a use.

Reason for Policy

5.3.8. The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition from commercial uses because of the high land values in the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed, before a site will be allowed to change use.

5.3.9. There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include Livery Halls (unique to the City), historic public houses, theatres, museums, churches, heritage attractions and specialist retail premises such as the Silver Vaults in Chancery Lane. The policy does not apply to hotels.

How the policy works

5.3.10. Applicants will be required to demonstrate that an existing visitor, heritage, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use).

5.3.11. Policy C2: Provision of Visitor Facilities

1. The provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm, will be encouraged, including:

- seating, benches and tables that can be used for resting and other activities;
- structures and landscaping to enable children's play and provide facilities for school groups;
- suitable shelter from weather conditions including heat and rain;
- well-designed public convenience provision which is accessible to all users;
- well-designed signage, way finding and links to visitor facilities and destinations;
- temporary pop-up art installations in appropriate locations;
- performance spaces where appropriate.

Reason for the policy

5.3.12. The City attracts large numbers of tourists in certain locations such as around St. Paul's Cathedral and near the Tower of London. This is expected to grow with new attractions such as the relocated Museum of London in Smithfield

attracting increased numbers of visitors.. It is important that the City of London can offer a range of facilities and events which meet the needs of these visitors whilst creating a distinctive look and feel for the City.

How the policy works

5.3.13. The City Corporation will work with developers and arts and culture institutions to ensure that open spaces near tourist attractions provide facilities that improve the experience for visitors and cater for how visitors use the space. These facilities must be capable of being accommodated without detracting from the setting of the relevant tourist attraction or the wider townscape.

Policy C3: Hotels

1. Proposals for hotels and other visitor accommodation will be permitted providing they:

- do not result in the loss of viable office accommodation for which there is continuing need, as set out in Policy O2;
- do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- include a range of facilities accessible to the public;
- provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, taxis and coaches, appropriate to the size and nature of the development;
- are inclusive, providing a minimum of 10% of hotel rooms to wheelchair-accessible standards;
- ensure continuing beneficial use for historic buildings, where appropriate.

2. Proposals for new hotels and other visitor accommodation will be resisted where they would result in an over-concentration of similar uses in the surrounding area.

Reason for the policy

5.3.14. While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in 2017 had 34 hotels, apart-hotels and hostels, providing 5,100 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. This demand is driven by a predicted increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City's predicted share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood of the City meeting the London Plan requirement.

5.3.15. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for hotels for business accommodation will therefore increase. Visitor numbers are also

predicted to increase, and the development of Culture Mile is likely to increase demand for hotel accommodation in the north west of the City which currently has very few hotels.

5.3.16. There is, however, a need to ensure that hotel development does not prejudice the primary business function of the City by displacing sites that are suitable for office accommodation. Hotels can also cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. Where new hotels are considered to be acceptable, they should enable the public to access facilities such as co-working space, meeting rooms, restaurants or leisure facilities in order to bring the maximum benefit to the City’s communities.

5.3.17. Proposals for new hotels and other visitor accommodation will be considered more favourably in Culture Mile (see Policy S23) and are not appropriate in the City Cluster (see Policy S20).

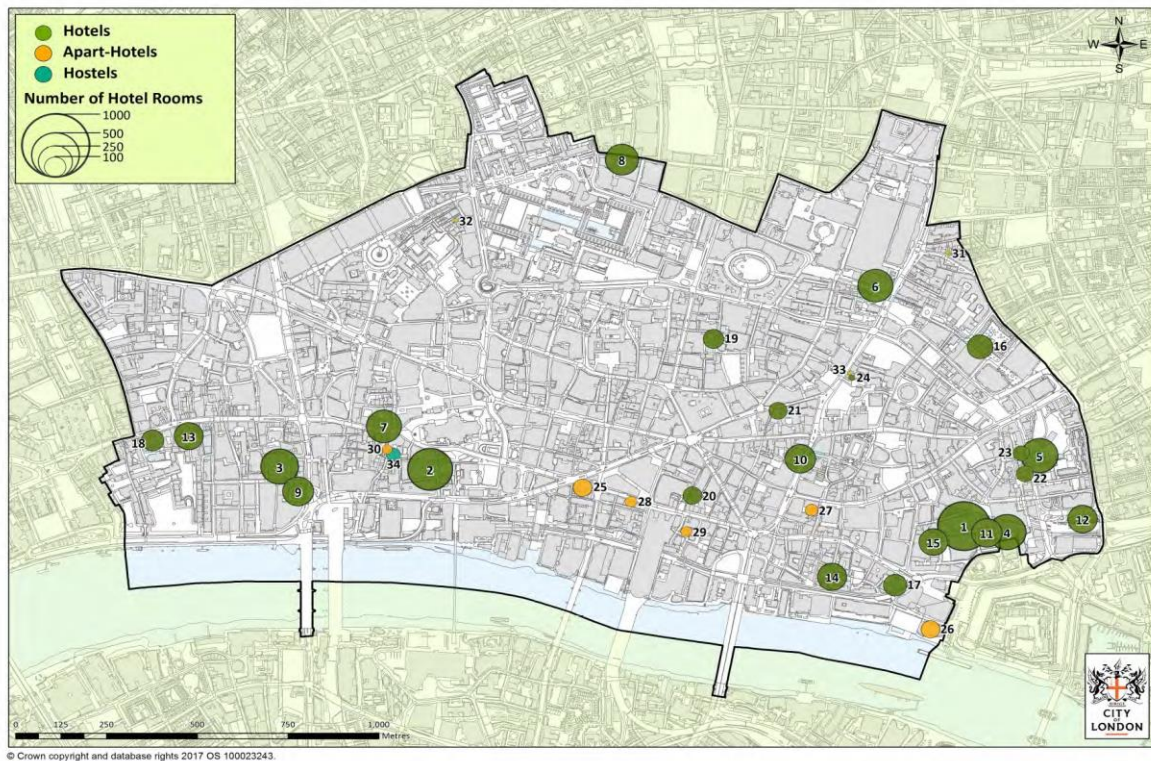


Figure 10: Hotel and visitor attractions distribution 2018

How the policy works

5.3.18. Policy C3 applies to hotels, apart-hotels and serviced apartments.

5.3.19. Apart-hotels and serviced accommodation often display characteristics associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use

Classes, depending on their characteristics. Factors that may affect the Use Class include;

- Presence of on-site staff/management;
- Presence of reception, bar or restaurant;
- Provision of cleaning and administrative services;
- Ownership of units/ability to sell on open market; and
- Minimum/maximum lease lengths.

5.3.20. Where apart-hotels are considered to fall within the C3 (dwelling houses) Use Class, proposals will be assessed in accordance with the housing policies in this Plan. Conditions will be used to ensure units are subject to minimum lease lengths.

5.3.21. For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and would put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

Policy C4: Evening and Night-Time Economy

1. Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- the amenity of residents and other noise-sensitive uses;
- environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

3. Where new residential development is proposed close to existing evening or night-time uses, the residential development will only be permitted if it includes suitable measures to mitigate potential noise and disturbance to prospective residents.

Reason for policy

5.3.22. Evening and night-time entertainment is becoming an important part of the City's economy, bolstered by London's move toward becoming a 24-hour City, growing numbers of workers and visitors and the encouragement of arts and culture in the City. Night-time entertainment has the potential to cause noise disturbance to nearby residents as well as other impacts such as anti-social behaviour, litter and odours. These adverse impacts need to be mitigated.

5.3.23. Anti-social behaviour can potentially be reduced by providing a broad range of evening and night-time activities that appeal to different customers, rather than concentrating one type of use in a particular area. This includes extending the opening hours of existing day-time facilities such as shops, cafes and leisure facilities, which can promote customer cross-over and create bridges between the day-time and night-time economy.

How the policy works

5.3.24. The City Corporation will apply the principle that the development responsible for change is responsible for managing the impact of that change – the ‘Agent of Change’ principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.

5.3.25. Night-time entertainment uses in the City include restaurants and cafes (A3), drinking establishments (A4), hot food takeaways (A5) and other related uses including, for example, a nightclub or a mix of such uses. They form part of the City’s wider night-time economy, which includes 24-hour trading with other financial centres around the globe.

5.3.26. The control of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance.

5.3.27. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late night refreshment. This is supported by the City Corporation’s Code of Good Practice for Licensed Premises. The City Corporation has also published a Noise Strategy which sets the strategic direction for noise policy within the City of London and outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.

5.3.28. The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in complaints about disturbance and nuisance from excessive noise, particularly from people drinking and smoking outside, and arriving or leaving.

5.3.29. All planning applications for A3, A4, A5, and related, uses should include information stating the proposed hours of operation. Where this information is not provided, or hours of operation have not yet been confirmed, the City Corporation will impose conditions requiring the closure of the premises between the hours of 11pm and 7am unless further permission to vary these times is sought and granted.

5.3.30. Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are encouraged to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity.

5.3.31. Planning applications for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:

- hours of closure to protect amenity;
- noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as sound-proofing, noise controls and double entry lobbies;
- the dispersal of patrons so as not to cause disturbance to residents;
- arrangements for the storage, handling and disposal of waste;
- a timed programme for deliveries and collections and other servicing arrangements;
- measures to deal with the emission of odours; and
- location of ventilation ducts and plant.

5.3.32. Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule.

5.3.33. To safeguard quiet times and amenity, particularly for residents and other noise-sensitive uses, the City Corporation will attach planning conditions or seek s106 planning obligations to ensure compliance with agreed Management Statements. The City Corporation will normally apply conditions to limit the hours of operation where there is potential for unacceptable disturbance to local residents and others. Each case will be considered in relation to its locality and the need to strike a balance between the benefits to the City of night-time entertainment and the risk of disturbance to local residents, workers and others.

Policy C5: Public Art

1. The City's public realm and distinctive identity will be enhanced by:

- encouraging the provision of new artworks in appropriate locations in the City on public and private land;
- protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- ensuring that financial provision is made for the future maintenance of new public art;
- requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

2. The location of new and relocated artworks must:

- take into consideration the health and safety of pedestrians and other road users;
- avoid the proliferation of public art where the cumulative impact may have a detrimental effect on surrounding buildings and public realm.

Reason for the policy

5.3.34. Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place. Public art can mitigate the impacts of development by the creation of works giving visual pleasure and helping to re-establish local identity and sense of place. In this way, public art is a form of community infrastructure. Public art includes temporary installations as well as non-physical works such as soundscapes.

5.3.35. There are several arts events held regularly in the City including Sculpture in the City which enables works of art to be located throughout the City.

5.3.36. The quality of proposed public art must respect, and not detract from, the form and quality of the surrounding environment. Objects of cultural significance can include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.

5.3.37. Due to the increase in public art in the City, issues have arisen in terms of appropriate siting, and whether works of art should be time limited to avoid inappropriate proliferations. Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided and consideration given to ensuring that people with visual or mobility impairments are not placed in danger.

How the policy works

5.3.38. The City Corporation has operated a City Arts Initiative (CAI) group since 2012, which advises on the artistic merit, siting, setting and appropriateness of all new

public art proposals in the City. Temporary works of art (in situ for less than 8 weeks) will be considered by the CAI group.

5.3.39. Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design. Applicants must work with artists at the outset of a development rather than commissioning them to create an art work post construction. Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal agreement. Where works of art are part of a development or are on private land, it is expected that those pieces will be maintained to a high standard by the land owner.

5.3.40. Where it is considered that a proliferation of public art is having a detrimental impact on the public realm within a particular area the City Corporation may impose limits, through conditions, on the length of time that an art work can remain in situ.

5.4. Smart Infrastructure and Utilities

Context

5.4.1. The City of London relies on a range of utilities to function as a global financial and business centre and to meet the needs of its businesses, workers and residents. There are challenges to providing the infrastructure required to support existing activity in the City and to provide the infrastructure necessary to deliver the level of growth envisaged in the period to 2036.

5.4.2. Utilities infrastructure comprises the provision of electricity, gas, water, sewerage, sustainable drainage (SuDS), telecommunications, including wired and wireless infrastructure, decentralised energy networks and the pipe subway networks that accommodate such infrastructure.

Strategic Policy S7: Smart Infrastructure and Utilities

1. To coordinate and facilitate infrastructure planning and delivery all development should;

- Minimise the demand for power, water and utility services;
- Incorporate sustainable building design and demand management measures;
- Connect to existing pipe subways where feasible, particularly where there is pipe and cable congestion under the streets;
- Seek to provide the latest and best quality utility infrastructure and connections to serve the development;

2. Developers must engage with infrastructure providers at an early stage of design to ensure that the infrastructure needs arising from new development are addressed and required utility networks and connections are in place in time to serve the development.
3. Existing essential utilities and telecommunications infrastructure will be protected from development unless it is no longer required or will be adequately relocated.
4. The improvement and extension of utilities infrastructure should be designed and sited to minimise adverse impacts on the visual amenity, character and appearance of the City and its heritage assets.

Reason for the policy

5.4.3. There are specific challenges to providing the infrastructure needed to support existing activity in the City and provide the additional infrastructure necessary to support the scale of development set out in this Plan:

- The dense concentration of business activity in the City means that high demand is concentrated in a small geographical area.
- There is a legacy of congested cable routes under the City's streets.
- Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors.
- Energy and telecoms demands are increasing and there is a need to continually improve and upgrade networks to meet this changing demand.

How the policy works

5.4.4. The City Corporation has established strong links with the various infrastructure providers that service the City, including Thames Water, UK Power Networks, National Grid (gas), Citigen CCHP and telecoms providers. The City Corporation will seek to retain and strengthen these links, working with providers and regulators, where appropriate. Developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.

Policy SI1: Infrastructure provision and connection

1. Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for:

- Electricity, gas and water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands. Temporary Building Supply for the construction phase should be identified in conjunction with electricity providers including the estimated load capacity, substations and route for supply.

- Heating and cooling demand and viability of provision via decentralised energy networks. Designs must incorporate connections to existing decentralised energy networks where feasible.
- Digital and telecommunications network demand, including full fibre wired and wireless infrastructure in line with the Mayor of London's 'Wired Score' connectivity rating or equivalent, planning for dual entry through communal entry chambers and flexibility to address future technological improvements.
- Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

2. To avoid delays to prospective tenants, developers should consider pre-installing fibre optic and other communications networks into the new development.

3. Developers should conduct mobile signal tests within the development and consider the need for in-building mobile solutions where coverage is poor.

Reason for the policy

5.4.5. The dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and heating and cooling via the Combined Cooling Heating and Power (CCHP) network are of particular importance. Congested cable routes traverse the City under its streets. Energy demands are increasing, particularly to provide air conditioning to counter increased warming and the delivery of upgraded ICT networks required by financial and business services.

5.4.6. The City's Infrastructure Delivery Plan will set out in more detail the infrastructure projects that are under construction or required.

How this policy works

5.4.7. Developers must liaise with utility providers and adopt best practice in assessing and improving connectivity within developments. Connection layouts and future proofing should be considered in the design of the development.

5.4.8. Developers should engage with energy providers prior to commencement of development works to ensure the availability of Temporary Building Supplies, avoiding the need for diesel generators to provide electricity.

5.4.9. Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors. Developers must co-operate with infrastructure providers to minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction.

5.4.10. It is important for the City to be digitally connected and responsive to the changing requirements of business, and for buildings to be equipped to meet the needs of current and future occupiers. Developers will be expected to undertake

an assessment of the connectivity of major new office buildings or refurbishments, using a wired certification such as WiredScore. Development should result in an improvement in the City's digital connectivity and not worsen existing provision or signal strength.

- 5.4.11. The City Corporation will encourage the improvement and extension of utilities networks to ensure that the City is at the forefront of the Smart City agenda and continues to provide good quality services for businesses, residents, students and visitors. The City Corporation's 'City Developer Guidelines for Incoming Utility Services' provides guidance on best.

Policy SI2: Infrastructure Capacity

1. Development must not lead to capacity or reliability issues in the surrounding area and capacity projections must take into account the impacts of climate change which may influence future infrastructure demand.
2. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to facilitate appropriate improvements which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.
3. Developers are required to demonstrate, through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation.

Reason for the policy

- 5.4.12. Early engagement with infrastructure providers is essential to ensure that there is adequate capacity to serve the development during its construction and operational phases.

How this policy works

- 5.4.13. The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and may include evidence of engagement with providers.
- 5.4.14. Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote a low-carbon based economy, through smart buildings and incorporating alternative solutions into the design. It may be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure. This may include studies undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.
- 5.4.15. Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in under-utilisation of infrastructure. The cumulative impacts should be considered through discussion with providers, and

pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.

5.4.16. Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.

5.4.17. Redundant plant should be removed where possible to enable future infrastructure connections. Redundant infrastructure within the public realm, such as telephone boxes, should be removed unless of heritage interest.

Policy SI3: Pipe Subways

1. Developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes where these are available. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

Reason for the policy

5.4.18. Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways is being considered in order to provide greater capacity for pipes and cables and reducing the need for street works which often cause disruption. Pipe subways accommodate gas and water mains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then inaccessible.

How the policy works

5.4.19. The City Corporation will seek the expansion and integration of development into the pipe subway network where there is sufficient evidence to demonstrate that services to development would be better integrated within an established pipe subway. Given the cost of installing new pipe subways, it is especially important to make efficient use of the existing network. Developments which are located adjacent to existing pipe subways will normally be expected to install connections.

6. Shape Outstanding Environments

6.1. Design

Context

- 6.1.1. The built environment of the City of London has a unique and distinctive character. Arranged on a medieval and Roman street pattern, high quality historic and modern buildings and urban green spaces create a rich visual landscape of building types, materials and architectural design. Individually and collectively the buildings within the City of London contribute to a nationally and internationally renowned townscape.
- 6.1.2. The City has been a centre for international trade for centuries and this long history of commercial activity and its modern role as a world-leading financial and business centre is reflected in the design of the buildings and their activities. The predominant office use and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape which presents challenges and opportunities to ensure that new development delivers good growth.
- 6.1.3. The demand for additional commercial floorspace also creates challenges given the limited amount of space in which to develop. Innovative and creative solutions are required to optimise the use of land as a scarce resource, while creating architecture of world class standard which enhances the City's rich character.
- 6.1.4. To realise the City Corporation's vision for the Square Mile, the design of the built environment should contribute towards the delivery of a competitive and creative City with exemplars of sustainable building design. Development should contribute towards the aim of achieving a zero emission and climate resilient City.

Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces, seeking design solutions that make effective use of limited land and contribute towards a zero emission City, through development which:

Form and Layout

1. Optimises pedestrian movement by maximising permeability, providing external and internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;

2. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;
3. Delivering public space at the upper levels of buildings by maximising the amount of accessible and free to enter roof terraces and spaces, including in tall buildings and along the river and around City landmarks; and
4. Delivering world class sustainable buildings which are mixed-use, resilient, adaptable and contribute towards a zero emission, zero carbon and climate resilient City.

Experience

5. Optimises micro-climatic conditions, addressing solar glare, daylight and sunlight and uncomfortable wind conditions and delivering improvements in air quality, open space and views;
6. Delivers street level building frontages so that they are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
7. Optimises the amount of green infrastructure and amenity space designed as integral to the architecture, enhancing public access to nature and biodiversity through maximising the amount provision of green roofs, walls and trees; and
8. Delivers inclusive buildings, streets and spaces to meet the access needs of all the City's communities.

Quality and character

9. Delivers high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the City's local and wider character and appearance;
10. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
11. Considers lighting as integral to the design process, considering issues of light spill/trespass to the public realm and the character of the of the area;
12. Incorporates signage is of an appropriate siting, size, form, appearance and illumination, and successfully integrating it into the architecture of the building;
13. Incorporates necessary security measures as an integral part of the design; and
14. Ensures that the building design concept is maintained from permission through to completion of a project.

Reason for the policy

6.1.5. As a world leading financial and business centre, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings.

How the policy works

6.1.6. To create a zero-emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.

6.1.7. All development should meet the highest standards of urban design, while also respecting its surroundings and the unique character and history of the City. Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. The diversity of the townscape means that different design considerations apply to each site and these need to be carefully assessed to take account of each building's context. This should not constrain design approaches, and a range of solutions may be appropriate.

6.1.8. The City has a large workforce whose numbers are expected to grow substantially. Most journeys within the Square Mile are on foot and pedestrian movement is particularly high during morning and evening peak times. The City has retained much of its historic street pattern, which provides convenient walking routes and allows for a high degree of pedestrian permeability. The City Corporation uses pedestrian modelling to better understand pedestrian flows and to manage the impact of proposed new development.

6.1.9. Outdoor advertising has a significant impact on the appearance of buildings, the street scene and, in particular, the historic environment. The City Corporation's long-standing approach is to restrain advertisements in terms of size, location, materials and illumination as a means of safeguarding the high quality of the City's environment.

6.1.10. The City has numerous small open spaces, which provide valuable amenities, many of which are of historic importance. The design of these small spaces requires innovative and sensitive solutions which respect their settings and create high quality, accessible areas for all the City's communities. The City's streets provide space for public enjoyment, and the City Corporation has a programme of public realm enhancement projects to improve the quality, sustainability, inclusivity and amenity of the public realm.

6.1.11. The City provides significant employment and leisure opportunities that should be accessible to all. Accessibility to new and existing buildings and spaces must be maximised to create an inclusive environment. Adaptation of historic buildings presents particular challenges and requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and will prepare guidance for developers.

Policy D1: Sustainability Standards

1. All development must demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development.
2. Proposals for major development will be required to:
 - achieve a BREEAM rating of “excellent” or “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, pollution and materials).
 - demonstrate that London Plan carbon emission and air quality requirements have been met on site. In exceptional circumstances where standards cannot be met on site offsetting will be required to account for the shortfall.
 - demonstrate climate resilience in building and landscape design.
 - incorporate collective infrastructure such as heating and cooling networks, smart grids and collective battery storage wherever possible, to contribute to a zero-emissions, zero-waste, climate resilient City.

Reason for the policy

6.1.12. The drivers for sustainable development are increasing, affecting global and local businesses, workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City’s priorities:

- Energy, carbon emissions and air pollutants – reducing emissions and moving to a zero emissions city
- Water – reducing water use in an area of serious water stress
- Pollution – reducing exposure to poor air quality
- Materials – reducing embodied carbon and improving resource efficiency

6.1.13. Social and environmental responsibility is high on the agenda for many City businesses and their workforce. A working environment that supports these goals is essential to attract the City’s future businesses. The London Plan provides a framework for driving forward this agenda but must be implemented at a local level.

6.1.14. The City of London Zero Emissions Study 2018 provides evidence for the trajectory to a Zero Emissions City. The role of collective infrastructures such as smart grids, battery storage and heating and cooling networks are highlighted as essential elements of a future zero emissions City, where decarbonised electricity, that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels therefore connection to these networks is expected wherever feasible.

How the policy works

- 6.1.15. The policy applies to all development in the City, including major new development, extensions to existing buildings and minor development. Refurbishments of existing buildings are also subject to this policy where proposed works constitute development. Standards required are those that are in place at the time of submission of a planning application.
- 6.1.16. Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development, demonstrating that the design meets the highest feasible and viable standards.
- 6.1.17. For major development the Sustainability Statement should include:
- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
 - an energy assessment in line with the Mayor's Energy Planning Guidance. Where carbon offsetting is required this will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects in the City or elsewhere.
 - an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
 - details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
 - Details of collective infrastructure which has been incorporated to address environmental challenges

Extensions:

- If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a coherent structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly including consideration of London Plan carbon emission targets and BREEAM requirements.

For minor development

- Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.

6.1.18. Policy D2: New Development

1. Development should be of a world-class standard of design and architectural detail and enhance the townscape and public realm.

2. The design of all new development must ensure that:

- The bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area, enhancing pedestrian permeability.
- Appropriate, high quality and durable materials are used.
- The design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm.
- Development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets.
- Proposed uses can be accommodated within the curtilage of the development and do not rely on use of the public realm
- Plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.
- Servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design.
- There is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening.
- Buildings are inclusive and accessible to all.

Reason for the policy

6.1.19. The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are characteristic of, and combine to produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

How the policy works

- 6.1.20. In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and architectural detailing.
- 6.1.21. Wind conditions and solar glare can have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions and solar glare. Any adverse impacts will need to be mitigated and appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published Planning Advice Notes on micro-climatic issues.
- 6.1.22. The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated with the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.
- 6.1.23. In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Features such as blank frontages and ventilation louvres should be avoided. Ventilation louvres, where required, should be located away from busy streets. Servicing entrances should be carefully designed to minimise adverse effects on the townscape.
- 6.1.24. The design of buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs. Proposed uses must not rely on the use of space in the public realm, including the use of public highway.
- 6.1.25. The City of London has many public and private viewing galleries, terraces and tall buildings, meaning that many workers, residents and visitors see the townscape from above. Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the building as viewed from surrounding buildings as well as from the ground. The potential to add visual interest to a roofscape, including greening, should be actively considered from the outset of any scheme.
- 6.1.26. Where feasible, plant should be located below ground. Where this is not feasible, additional roof top plant for an existing building should be satisfactorily integrated into the form and design of the existing roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the

general scene, or views from other buildings. All chimneys should terminate at the highest point of the building. Consideration should be given to the use of external heating and cooling supplies from district heating and cooling networks, such as the Citigen network, where available, as these may avoid or reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms, as well as providing wider environmental benefits.

6.1.27. Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas. Gates and doors should be well designed and should be kept closed when the entrance to the service bay is not in use.

6.1.28. Ventilation or extraction systems should be routed internally and extensive or unsightly external ducting will be refused. Provision must be made within the building for services and ducting to and from all uses. Ventilation louvres should not be sited by adjoining footways. Developments should incorporate suitable off-street facilities for smokers wherever possible to avoid the need for smokers to congregate on the pavements.

6.1.29. Developers should provide suitable rooftop ventilation for the City's sewer network, where appropriate, and this should be integrated into the design of buildings.

Policy D3: Public Realm

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of the streets and spaces between buildings and the creation of new spaces. Public realm schemes must be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- The predominant use and function of the space and adjacent spaces.
- The use of sustainable natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City.
- The inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors.
- The City's heritage, identifying and retaining features that contribute positively to the character and appearance of the City.
- The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate the implementation of rainwater recycling.

- The need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered and enhance pedestrian permeability.
- High quality, safe and functional public realm that meets the needs of different users.
- The sensitive co-ordination of lighting with the overall design of the scheme
- The wellbeing of users in relation to air pollution, noise, temperatures, shading and micro climate

Reason for the policy

6.1.30. The City Corporation will actively promote schemes for the enhancement of the street scene and public realm. High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

6.1.31. Further guidance on the implementation of public realm enhancement is set out in the City's Public Realm Supplementary Planning Document and the City Public Realm Technical Manual, and the Mayor of London's Streetscape Guidance.

How the policy works

6.1.32. The City Corporation will undertake street enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the Community Infrastructure Levy and funding from external sources to deliver enhancement works.

6.1.33. All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City.

6.1.34. The incorporation of artworks or integral decorative features, such as sculptures, fountains and schemes included in the City Arts Initiative, to create animated spaces, will be encouraged and their design, management and maintenance regime should be considered at an early stage of the design. Detailed guidance is provided in Policy C5.

6.1.35. Further information on design and requirements for the public realm is available in the City Public Realm Supplementary Planning Document.

Policy D4: Pedestrian permeability

1. Improved way-finding will be sought through public realm improvements. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:

- Providing good quality, safe and low pollution pedestrian connections between spaces.
- Providing new pedestrian routes through buildings and development sites and respecting, maintaining and where feasible restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways.
- Providing publicly accessible ground floors for improved pedestrian movement, where feasible.
- Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.

2. Developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest.

Reason for the policy

6.1.36. The intensification of the use of buildings and the increase in the City's working population are putting added pressure on the capacity, convenience, comfort and safety of the spaces, streets, lanes and alleys at the heart of the City. Peak times are particularly busy for all forms of transport, and the potential for conflict between modes of travel is increased.

6.1.37. Most travel in and through the City is on foot.

How the policy works

6.1.38. In order to reduce pedestrian congestion and improve pedestrian access through the public realm, new pathways for moving through the City will need to be created or re-established if they were previously in existence. Spreading the footfall across a wider area will help to create a more vibrant and comfortable street network.

6.1.39. Development will be expected deliver net gains in the public realm, through the establishment of new pedestrian routes around and through buildings, having regard to the cumulative impact of their development alongside existing and permitted development on the capacity of pedestrian routes. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected and permeability of the City compromised.

Policy D5: Terraces and Viewing Galleries

1. Roof terraces will be permitted providing:

- The design of the roof is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;
- There would be no immediate overlooking of residential premises or significantly adverse impacts on residential amenity;
- Historic or locally distinctive roof forms, features or structures are retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace maximises the potential for urban greening;
- Emissions from combustion plant will not affect users of the roof garden.

2. The provision of free to enter, publicly accessible areas will be required as part of all tall building developments, which may include public viewing galleries where appropriate.

Reason for the policy

6.1.40. Roof gardens and terraces are becoming increasingly common in the City. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

How the policy works

6.1.41. Proposals for roof gardens and terraces should be sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive. There should be no impact on strategic or locally protected views.

6.1.42. Roof terraces and gardens should be publicly accessible where possible and entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels to the surrounding area, and appropriate safety features should be included to prevent people from jumping or falling. The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.

6.1.43. Public access to the tall buildings found within the City of London is important in creating an inclusive City. Tall buildings should provide publicly accessible areas at upper levels, which are free to enter. These may include public viewing

galleries or other forms of open space provision, or features such as retail, leisure or educational facilities.

Policy D6: Shopfronts

Shopfronts should be of a high standard of design and appearance; inappropriate designs and alterations will be resisted. Shopfront proposals should:

- Respect the quality and architectural contribution of any existing shopfront.
- Maintain the relationship between the shopfront, the building and its context.
- Use materials which are sympathetic to the wider context and are of high quality.
- Ensure that signage is in appropriate locations and in proportion to the shopfront.
- Take into account the impact of the installation of louvres, plants and access to refuse storage.
- Ensure that awnings and canopies are positioned only in locations where they would not harm the appearance of the shopfront or obstruct architectural features.
- Avoid openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity.
- Avoid external shutters and consider alternative security measures.
- Consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance.
- Ensure that the design allows access by users, for example, incorporating level entrances and adequate door widths.
- Ensure that internal shop lighting does not create inappropriate light spillage into the public sphere.

Reason for the policy

6.1.44. Shopfronts are important elements in the townscape and can contribute significantly to the look of any street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.

6.1.45. Existing shopfronts that contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group, should be retained. Any modifications necessary should be sympathetic to the original design.

How the policy works

- 6.1.46. New shopfront proposals should consider the relationship with the upper floors of the building and surrounding buildings and include high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth), which are out of proportion or scale with the shopfront or considered to have a detrimental visual effect on the building or the street scene.
- 6.1.47. The design of new shopfronts should include a signage zone that is consistent across a parade of shops of matching or similar design.
- 6.1.48. Modification to shopfronts and shopfront designs incorporating louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building if they cannot be accommodated in less sensitive elevations. Awnings and canopies should be integrated into the shopfront design in relation to size, location and materials.
- 6.1.49. Openable shopfronts and large serving openings are not normally acceptable as they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.
- 6.1.50. Security measures should be internal to limit their visual impact on shopfronts. External shutters are not normally acceptable, while internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of shopfronts.
- 6.1.51. Retail entrances should be designed with level entrances to enable inclusive access by all. Access measures and movable ramps should only be used where level entrance is not feasible.

Policy D7: Advertisements

1. Advertising must be of a high standard of design, restrained in amount and in keeping with the character of the City.
2. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted.

Reason for the policy

- 6.1.52. To protect and enhance the character of the City's streets, the City Corporation considers that advertising material should be restrained in quantity and form. Poor quality advertisements harm the street scene and the unique character of the City of London. The City Corporation will exercise advertisement control having regard to visual amenity and public safety and will seek improvements to the design of advertisements, where necessary.

How the policy works

- 6.1.53. Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the restrained character of the City. The display of poster advertisements on construction site hoardings will be resisted unless directly related to the development site. Further guidance is contained in the City Corporation's Hoardings Advice Note.
- 6.1.54. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should avoid static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, as a means of protecting visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.
- 6.1.55. Particular care will be necessary with retailing advertisements on or in the settings of listed buildings and within conservation areas. Internal illumination of adverts in such areas will not normally be permitted.
- 6.1.56. Advertisements above ground level are detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 6.1.57. Appropriate action will be taken to have unauthorised advertisements removed. The Transport Strategy indicates that the City Corporation will ensure that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

Policy D8: Daylight and sunlight

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is not reduced noticeably to unacceptable levels, taking account of the Building Research Establishment's guidelines.
2. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context.
3. The design of development should incorporate measures to mitigate adverse solar glare effects on surrounding buildings and public realm.

Reason for the policy

6.1.58. The City is an urban centre with a very high density of buildings. The impact of this density on surrounding areas can be to reduce levels of daylight and sunlight in the surrounding area below that which would normally be expected. The City Corporation seeks to provide the best outcome in terms of sunlight and daylight, both for the development itself and the buildings in the vicinity, requiring design strategies that maximise the natural light potential.

6.1.59. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.

How the policy works

6.1.60. The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Developers will be required to submit daylight and sunlight assessments in support of their proposals. The City Corporation may seek independent verification of these assessments at the developer's expense.

6.1.61. When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. Where appropriate, the City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.

6.1.62. Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered acceptable in planning terms and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

Policy D9: Lighting

1. Lighting should be sensitively co-ordinated with the overall design of any new development, having regard to siting, scale, type, intensity and colour temperature of light. Major development proposals must consider the lighting strategy early in the design process.

2. Development should incorporate measures to reduce the potential for light spillage from internal lighting, particularly where it would impact adversely neighbouring occupiers, the wider public realm and biodiversity.
3. The external lighting of buildings should contribute positively to the unique character and grandeur of the City townscape by night.
4. External lighting of heritage assets within the City must be sympathetic to the wider context in terms of tone and brightness.

Reason for the policy

6.1.63. The City Corporation's Lighting Strategy contributes to the City Corporation's wider aims of improving the night-time offering and creating an after-dark street experience that befits a world class business centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.

6.1.64. Development has the potential to adversely alter the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes can improve accessibility for those with disabilities by reducing glare and excessive contrast. In the City, the predominance of office buildings with glass frontages can lead to light spillage concerns for neighbouring residents with a potential impact on wellbeing. Avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting.

How the policy works

6.1.65. The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it adds to the overall experience of the area, celebrating and enhancing the unique atmosphere of the area, and providing orientation and way-finding after dark.

6.1.66. The Illuminated River art project, to be implemented by 2022, will enhance the visual impact at night time through lighting of all 5 bridges located in the City. This will be complemented by a reduction in street lighting found on the bridges.

6.1.67. The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting and limit adverse effects upon adjacent areas and uses.

6.1.68. Detailed information on requirements for lighting can be found in the City Lighting Strategy.

6.2. Vehicular Transport and Servicing

Context

- 6.2.1. The City is served by an extensive public transport network with six mainline railway stations, 12 underground and DLR stations and an extensive network of bus routes. In addition, major rail termini near the City are used by large numbers of City commuters. Significant improvements are being made to public transport provision, particularly with the opening of the Elizabeth Line in 2019 with two stations in the City at Farringdon and Liverpool Street/Moorgate. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City.
- 6.2.2. Traffic in the City has changed significantly over the last two decades, both in terms of total volume and overall composition. Biennial traffic counts across the City show a 40% decrease in overall traffic volumes, with greater reductions for motor vehicles such as cars and light goods vehicles. The greatest observed reductions in numbers have coincided with key events such as the introduction of the Congestion Charge Zone, the global recession and the introduction of cycle superhighways. The street capacity unlocked by these reductions, alongside increases in cycling infrastructure provision, has facilitated an estimated tripling of cycling volumes across the City.
- 6.2.3. Despite this reduction, there are still significant challenges. Traffic counts in autumn 2017 found a slight increase in car volumes, probably caused by the increasing volumes of private hire vehicles. Freight volumes, after dropping significantly between 1999 and 2004, have levelled off in recent years. The rapid increase in cycling volumes seen in the first decade of the 21st century has not been sustained, with volumes slightly decreasing in recent years.
- 6.2.4. The demands on the City's transport network are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation is developing a long-term Transport Strategy which will set the key priorities for the City's streets and how the network is used.
- 6.2.5. The Mayor's Transport Strategy provides London-wide guidance, which is implemented locally through the City's Local Implementation Plan. Transport providers serving the City also publish plans and strategies that influence investment and management decisions affecting the City's transport network.

Strategic Policy S9: Vehicular Transport and Servicing

The City's transport infrastructure will be maintained and improved by:

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity, including the Northern Line/Bank Station upgrade.

2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail and London Underground stations.
4. Minimising road danger and congestion and reducing vehicle emissions by:
 - Designing and managing streets in accordance with the City of London street hierarchy;
 - Minimising the impact of freight and servicing trips through measures including the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions and the use of freight consolidation;
 - Facilitating essential traffic, including buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
 - Encouraging the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
 - Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
 - Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised, including through the use of river transport.

Reason for the policy

6.2.6. The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. In transport terms, the City is already a highly sustainable location, and the opening of the Elizabeth Line will result in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London, to help secure improvements to public transport, for instance by safeguarding land from other forms of development where necessary.



Figure 11: Rail and underground network

6.2.7. The City’s draft Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. A simplified street hierarchy is proposed, as set out in Table 1.

Current category	Movement function	Proposed category
Strategic Road	Through traffic – the preferred streets for motor vehicles that do not start or finish their journey in, or immediately adjacent to, the Square Mile.	London Access (TfL network)
London Distributor Road		
Borough Distributor Road	Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access
Local Distributor Road		
Local Access Road	Access – used for the first or final part of a journey, providing access to properties.	Local Access

Table 1: Proposed street hierarchy in the City of London

6.2.8. The TfL network (classed as London Access) is expected to accommodate the majority of through traffic, while roads which are managed by the City Corporation are classed as either City Access or Local Access. Proposed changes to the highway network at Bank Junction, St Paul’s Gyratory and Beech Street are reflected in the new street hierarchy.



Figure 12: Proposed City of London Street Hierarchy

How the policy works

6.2.9. The City’s draft Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City’s streets, with targets proposed to reduce the number of motor vehicles in the City by 25% by 2030 and 50% by 2044. The spare capacity unlocked by these reductions will allow for the radical transformation of the City’s streets to deliver a healthier, safer and more attractive street environment.

6.2.10. Achievement of the targets will be partly dependent on measures introduced by the Mayor of London and TfL, such as the proposed Central London Zero Emission Zone, although the City Corporation will consider implementing such measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.

- 6.2.11. The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 6.2.12. The City Corporation will require developers and occupiers to implement proposals to to minimise the impact of freight and servicing trips through supporting measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.
- 6.2.13. Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City’s streets.

Policy VT1: The impacts of development on transport

- 1. Development proposals must have a positive impact on highway safety for all users and not have adverse effects on the City’s transport networks. Where development would result in adverse impacts on the transport network, these must be mitigated through site/building design and management of operational activities. Appropriate measures will be sought via planning contributions or by legal agreement.
- 2. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
- 3. Transport Assessments and Travel Plans are required for all developments that exceed the following thresholds:

6.2.14. Land Use	5. Thresholds
6.2.16. Offices	7. 1,000m ²
6.2.18. Residential	9. 10 units
6.2.20. Retail	1. 1,000m ²
6.2.22. Hotel	3. 10 bed spaces
6.2.24. Health	5. 1,000m ²
6.2.26. Transport Infrastructure	7. >500 additional trips per peak hour
6.2.28. Mixed Use	9. 1,000m ²

- 4. A Construction Logistics Plans is required for all major developments and for any developments that would have a significant impact on the transport network during construction.

Reason for the policy

6.2.30. Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport

Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.

How the policy works

6.2.31. An assessment of the transport implications of development, during both construction and operation, should address the impacts on:

- Road danger;
- Pedestrian environment and movement;
- Cycling infrastructure provision;
- Public transport; and
- The street network.

6.2.32. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's Transport Standards. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments.

6.2.33. A Construction Logistics Plan should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites.

6.2.34. Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.

Policy VT2: Freight and Servicing

1. Applicants are required to consult with the City Corporation and agree all matters relating to servicing at an early design concept stage. Development should be designed to allow for on-site servicing.
2. Developments must minimise the need for freight trips and seek to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation. New technologies will be encouraged to enable efficient servicing and deliveries to sites.
3. On site servicing areas must be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear.
4. Delivery to and servicing of new developments must take place outside peak hours (i.e. avoiding deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries should be made in the late evening or at weekends outside

of residential areas. Justification will be required where deliveries within peak hours are considered necessary. Areas of high footfall may be subject to further restrictions.

5. Developers should consider ways to reduce congestion caused by servicing and deliveries, such as implementing last mile deliveries by foot, cycle or zero emission vehicle, and should justify where such measures are not possible. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.
6. Provision should be made within buildings for shredding operations .

Reason for the policy

- 6.2.35. The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City Corporation is working with local employers to support them in freight consolidation and to share best practice and ideas, for example through the Cheapside Business Alliance and the Active City Network.
- 6.2.36. Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The use of different forms of consolidation, including 'virtual' as well as physical consolidation, will be required to minimise the number of trips required to service a development during construction and operation. Virtual consolidation involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building.
- 6.2.37. Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City's draft Transport Strategy aims to establish a sustainable logistics centre to serve the Square Mile by 2030. This centre would co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriership services. It would be supported by last mile logistics hubs within the City to facilitate more deliveries on foot, by bike and by small electric vehicles.
- 6.2.38. Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. To reduce emissions from delivery vehicles, electric vehicle charging points will be required within service areas for freight vehicles.

6.2.39. On-street shredding operations associated with building occupation creates noise and congestion on street and can have an adverse impact on the amenity of neighbouring uses. Provision should be made within off-street servicing areas for shredding operations.

How the policy works

6.2.40. Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

6.2.41. Where consolidation of servicing and deliveries is proposed, the number of vehicle trips that have been avoided as a result should be set out in the Delivery and Servicing Plan (DSP). Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP. Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements. The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation.

6.2.42. Out of hours servicing is required and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High foot fall in areas at other peak times may also require restrictions on deliveries and servicing.

6.2.43. Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP.

6.2.44. Provision should be made within off-street, in-building, servicing bays for shredding operations to reduce the potential for disturbance to neighbours. On-street shredding will not be permitted.

6.2.45. Further information is set out in the City of London's Freight and Servicing SPD.

Policy VT3: Vehicle Parking

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised as sites for last mile delivery hubs and other alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported only if it is demonstrated that they are no longer needed for a transport-related function.
4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

Reason for the policy

6.2.46. The City has excellent public transport accessibility and all development should therefore be car-free, unless it can be demonstrated that there are exceptional circumstances which justify limited car parking.

How the policy works

6.2.47. Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use.

6.2.48. The City's public car parks were mostly constructed during the 1960s. Some are now underused and may provide an opportunity for the provision of last mile delivery hubs or other transport-related infrastructure. Evidence will be required to demonstrate that a car park is no longer required for a transport-related purpose if conversion or redevelopment to an alternative land use is proposed.

Policy VT4: River Transport

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore and other river-based transport infrastructure. The City Corporation will seek the reinstatement of Swan Lane Pier and development which prejudices this reinstatement will not be permitted.
2. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site.

3. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.

Reason for the policy

6.2.49. Walbrook Wharf is the only active river wharf in the City and will be retained as a waste facility and river wharf in line with the London Plan and the Mayor's Safeguarded Wharves Direction. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site, there may be potential to use Walbrook Wharf for freight logistics.

6.2.50. Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.

6.2.51. Swan Lane pier is a redundant pier and the City Corporation will seek its reinstatement. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.

6.2.52. The City Corporation will require developments adjacent to, on, or over the river, to consider the use of the river for freight and servicing and for the transport of construction and waste materials.

Policy VT5: Aviation Landing Facilities

Heliports will not be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

Reason for the policy

6.2.53. Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's draft Transport Strategy sets out principles that will apply to the potential use of drones in the City.

6.3. Walking, Cycling and Healthy Streets

Context

6.3.1. The Mayor of London, through the Mayor’s Transport Strategy, aims to significantly change the function of London’s streets to reduce the dominance and negative impacts of motor traffic and enable walking, cycling and social interaction. The Healthy Streets Approach focuses on human health and uses evidence-based indicators to assess the street environment. These include ensuring people feel safe and creating street environments that enable people to choose walking, cycling and public transport instead of using the car. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.



Figure 134: Mayor’s Transport Strategy - Indicators of Healthy Streets

6.3.2. The demands on the City’s streets are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation is developing a long-term Transport Strategy which will set priorities for how streets are used. The Healthy Streets Approach provides the framework for the City’s Transport Strategy.

6.3.3. The City’s workforce is expected to increase significantly over the course of the Plan period to 2036, while visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early evening. Figure 14 illustrates forecast pedestrian flows across the City in 2026 during the am peak.

2026 Baseline scenario Morning peak (07:00 – 10:00)

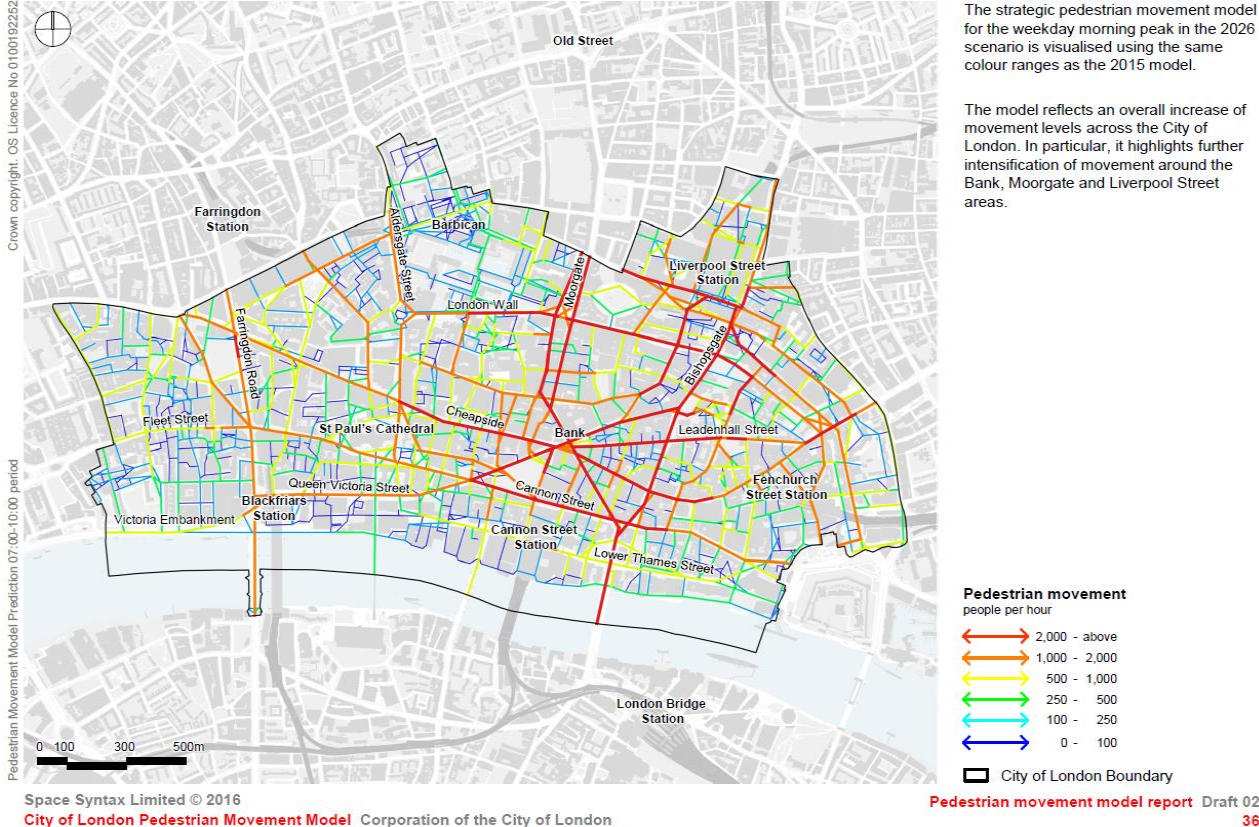


Figure 14: Forecast pedestrian flows in the City of London in the am peak in 2026

Strategic Policy S10: Walking, Cycling and Healthy Streets

The City Corporation will work with partners to improve the quality and permeability of the City’s streets and spaces to prioritise walking and cycling, improve accessibility and encourage more active modes of travel to, from and within the City by:

- Improving conditions for safe, convenient, comfortable and accessible walking and cycling, incorporating climate change adaptation;
- Expanding the cycle network across the City with the aim of ensuring that all property entrances are within 250m of the network;
- Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City’s Transport Strategy;
- Improving access routes and the public realm around stations, and between stations and key destinations; and
- Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of people with disabilities;

Reason for the policy

6.3.4. Most movement in the City is on foot and the street environment is predominantly a pedestrian environment. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost 300% between 1999 and 2017, although the rate of growth has slowed markedly since 2012. Pedestrian numbers have also risen in recent years as the City's workforce has grown. Over 400,000 pedestrians were counted on the City's streets during a survey in November 2017.

6.3.5. Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles.

6.3.6. The Mayor's Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk and cycle.

How the policy works

6.3.7. Through the City's draft Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling and walking, enhance the public realm and create new public space.

6.3.8. The first three Healthy Streets Plans, to be developed by 2022, will cover the following areas:

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum of London. The area covered will align with the Smithfield and Barbican Key Area of Change.
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting the delivery of the proposed new Centre for Music and associated changes to the Museum of London roundabout and St Paul's Gyratory.
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Cluster Key Area of Change and incorporate part of the Aldgate Key Area of Change.

6.3.9. An experimental safety scheme was introduced at Bank Junction in May 2017, which restricted traffic to buses and cycles only on weekdays between 7am and 7pm. Monitoring shows that this scheme achieved a significant reduction in casualties at the junction, while also reducing NO₂ emissions in the area. . Traffic restrictions at the junction have now been made permanent and a wider series of highways and public realm enhancements, known as All Change at Bank, will be implemented during the Plan period to transform the look and feel of this key junction at the heart of the City.

6.3.10. Adaptation to the anticipated climate change in the City should include pollution reduction and mitigation. The Mayor's Healthy Streets Approach and the City's draft Transport Strategy seek to deliver improvements in air quality and reductions in emissions and noise from transport. The City Corporation is working with partners to ensure that the City's streets and the public transport system are resilient to the long-term impacts of severe weather and climate change.

Policy W1: Pedestrian Movement

1. Developers should facilitate pedestrian movement by provision of suitable routes through and around new developments. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall.
2. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians using them.
3. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
 - The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - The shortest practicable routes between relevant points.
4. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
5. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable unless exceptional circumstances can be demonstrated.
6. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.
7. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.

Reason for this policy

- 6.3.11. In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes.
- 6.3.12. The City Corporation's draft Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets with an initial focus on the City Cluster and Culture Mile. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 6.3.13. The draft Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 13):
- The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank Junction.
 - Bank Junction and streets between the junction and the City Cluster.
 - The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory.
 - The route between the Barbican and the new Museum of London, including Beech Street and Long Lane (the 'Culture Spine').
 - Fleet Street, including Ludgate Circus (in partnership with TfL).
 - The Bishopsgate corridor, including Monument junction (TfL)
 - The Globe View section of the Riverside Walkway.

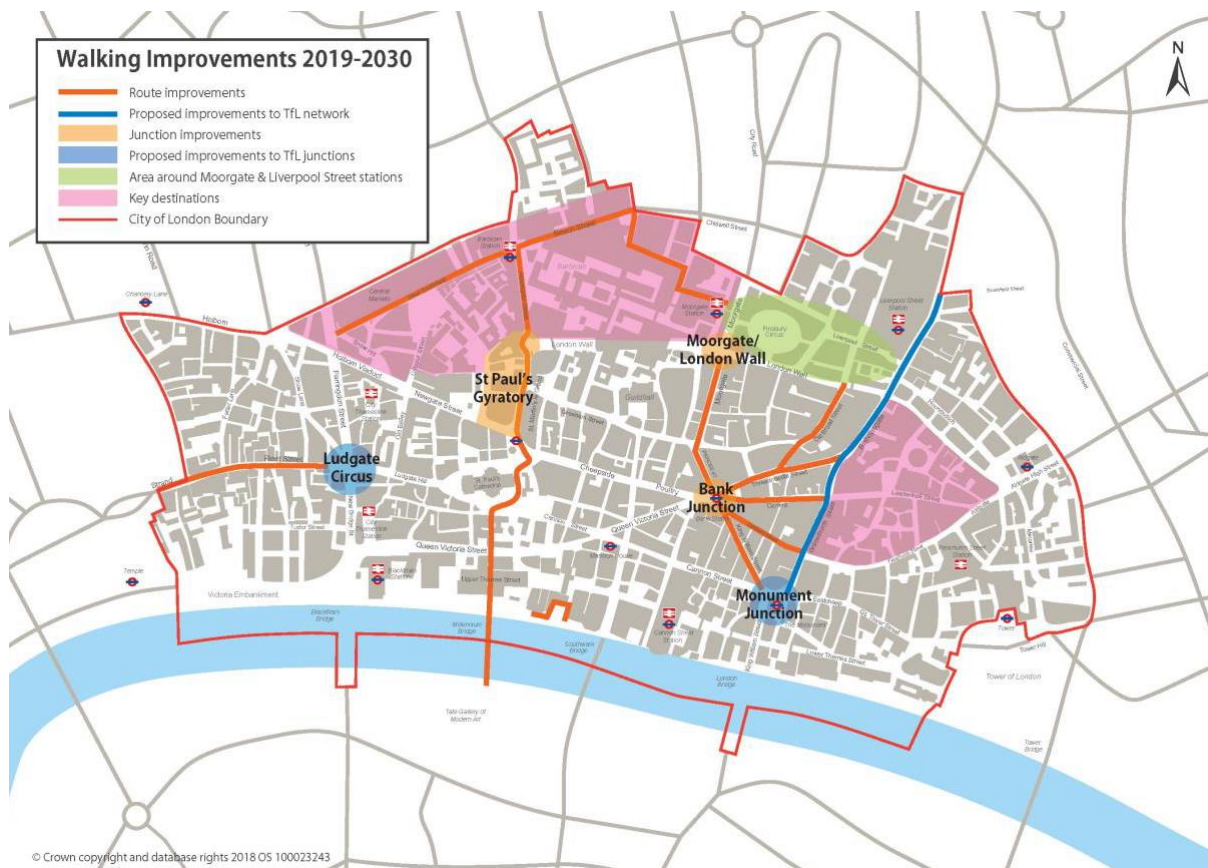


Figure 15: Key walking routes to be delivered by 2030

6.3.14. The City’s narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, way-finding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City’s users.

How the policy works

6.3.15. In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.

6.3.16. Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. TfL’s Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City’s draft Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the

level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

6.3.17. Where new pedestrian routes are created or existing routes improved, the City Corporation will work with organisations such as the Active City Network and the Cheapside Business Alliance to provide information about routes to City workers, residents and visitors.

Policy W2: Active Travel including Cycling

All major development must promote and encourage active travel through making appropriate provision for pedestrians and cyclists by:

- ensuring suitable access between the development site and pedestrian and cycle routes;
- incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling.

Reason for this policy

6.3.18. Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.

6.3.19. A growing number of people are choosing to cycle through and around the Square Mile. Increased access to the East-West and North-South Cycle Superhighways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 14). Cycling improvements and interventions will be prioritised on this network, with the aim of delivering key parts of the core cycling network by 2030.

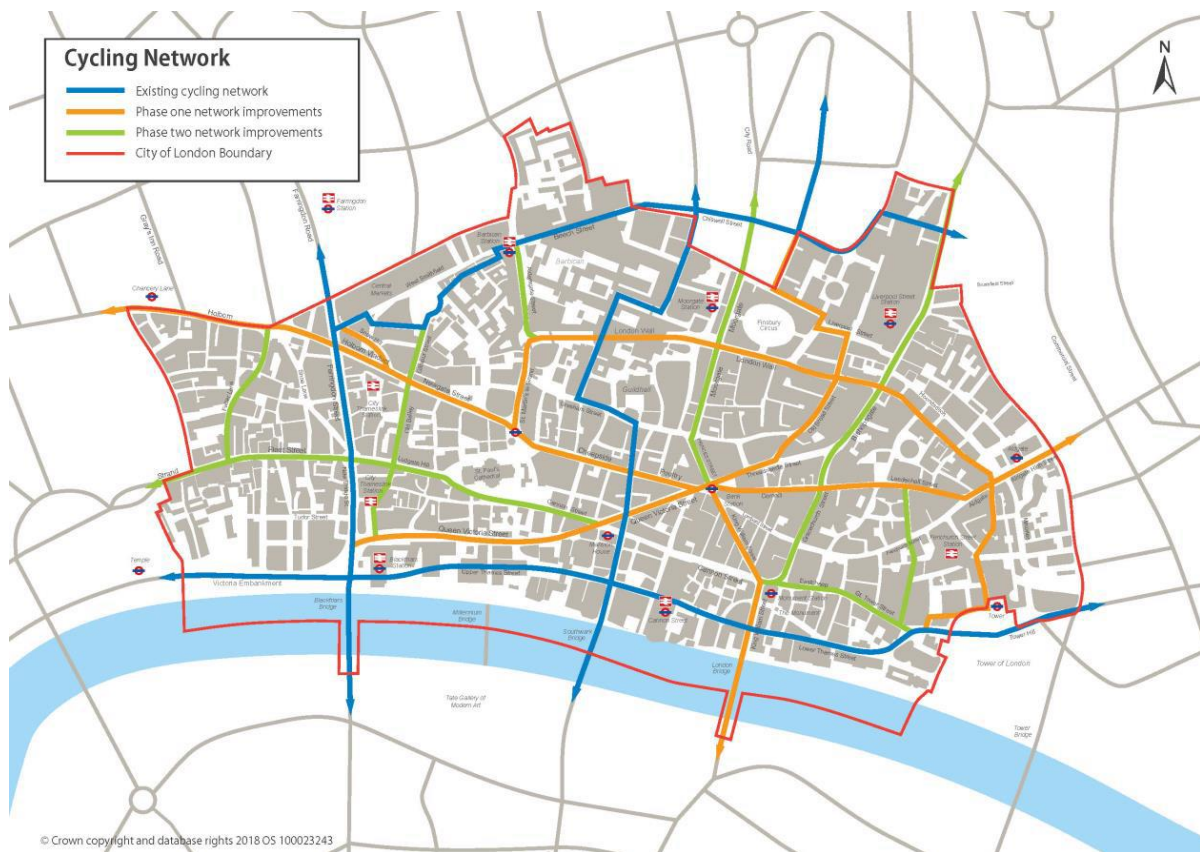


Figure 16: Proposed core cycling network

6.3.20. Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans and a review of existing Quietways, which run along less heavily trafficked back streets. Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London’s Transport Strategy, and that of the Mayor of London.

How the policy works

6.3.21. New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. The City of London’s Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this.

6.3.22. Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City’s cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

Policy W3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
2. All on site cycle parking must be secure, undercover and preferably enclosed.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.

Reason for this policy

6.3.23. There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

How the policy works

- 6.3.24. Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. A robust justification for failure to comply with London Plan standards will be required. This will be considered on a case by case basis as part of pre-application discussions.
- 6.3.25. Short-stay visitor cycle parking should be provided on-site alongside long-stay employee parking. If this is not possible because of the layout and configuration of the site, then on-street cycle parking nearby will be encouraged providing this does not obstruct pedestrian movement.
- 6.3.26. In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.
- 6.3.27. The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.
- 6.3.28. This policy applies to the cycle parking provided within new developments. The City Corporation's draft Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. A Cycle Parking Delivery Plan will be published by 2020, which will review the availability and distribution of public cycle parking on and off-street to ensure it is sufficient to meet forecast demand.

6.4. Historic Environment

Context

6.4.1. The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.

6.4.2. There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17th century home on Cloth Fair to Wren's iconic St Paul's Cathedral and churches and to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 Scheduled Ancient Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides an immediate backdrop for the Tower of London World Heritage Site.

Strategic Policy S11: Historic Environment

The City's heritage assets, their significance and settings will be positively managed, by:

1. Conserving and enhancing heritage assets to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing;
2. Encouraging the beneficial, continued use of heritage assets consistent with their conservation and enhancement;
3. Seeking improved public access, and enhanced interpretation of the City's heritage;
4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations;
5. Preserving and seeking to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.

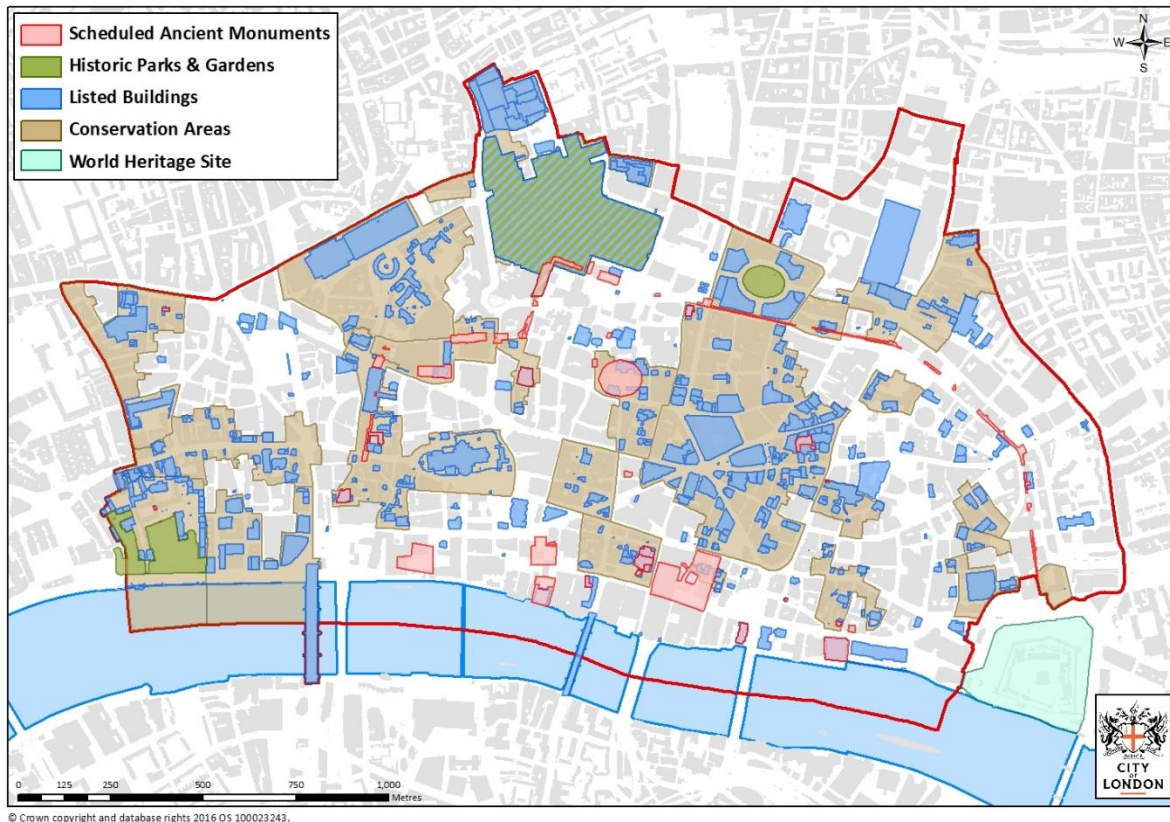


Figure 17: Designated heritage assets in the City of London

Reason for the policy

6.4.3. The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.

6.4.4. The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.

6.4.5. The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space. The City also has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches and an equally unique collection of over 60 churchyards embedded within a dense townscape.

6.4.6. Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as

creative industries. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

How the policy works

6.4.7. The policy allows for adaptations to be made to heritage assets where the alterations are consistent with the conservation and significance of those assets. The sensitive adaptation of heritage assets contributes to the continual growth of the City's economy. This and continued investment will ensure that buildings retain an active use so that the City's buildings and heritage can be appreciated by present and future generations.

6.4.8. In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage site of outstanding universal value.

Policy HE1: Managing Change to Heritage Assets

Development proposals which affect heritage assets or their settings should meet the following criteria:

1. They are supported by a Heritage Assessment, to evaluate the significance of relevant heritage assets to inform the proposals and maximise enhancements;
2. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought;
3. Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings. The demolition or removal of designated heritage assets will be resisted;
4. Development in conservation areas should conserve and enhance the character or appearance of the conservation area. The removal of features which contribute to the character, appearance or significance of a conservation area will be resisted;
5. Development should not adversely affect Historic Parks and Gardens that are included on the Historic England register.

Reason for the policy

6.4.9. It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.

- 6.4.10. The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have historically been lost to the detriment of the City's historic townscape. Where possible, via development, the City will seek to re-open or reintroduce such routes.
- 6.4.11. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.
- 6.4.12. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 6.4.13. Many buildings in conservation areas, whilst not being listed, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.
- 6.4.14. Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.
- 6.4.15. Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building is minimised. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.
- 6.4.16. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations is a material consideration.

6.4.17. Development proposals that affect the City's historic parks and gardens will be assessed to ensure that overshadowing does not cause undue harm, that their historic character is maintained, and that the setting, enjoyment, and views into and from these gardens are respected. Development should not detract from the layout, design, character, appearance or setting of the park or garden or prejudice its future restoration.

How the policy works

6.4.18. Developers will be required to provide supporting information describing the significance of any heritage assets whose fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets.

Policy HE2: Ancient Monuments and Archaeology

1. Development proposals which involve excavation or ground works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.
2. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, public display and interpretation where appropriate.
3. Proper investigation and recording of archaeological remains will be required as an integral part of a development programme, together with timely publication and archiving of results to advance understanding.

Reason for the policy

6.4.19. The entire City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.

How the policy works

6.4.20. Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and inform consideration of the development proposals by the City Corporation.

6.4.21. In some cases, a development may reveal a monument or archaeological remains which will be displayed on the site, or reburied. On sites where

significant monuments or archaeological remains exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future. Undesignated archaeological remains equivalent to a scheduled monument will be given equal weight to designated heritage assets.

6.4.22. The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of the development proposals. Agreement will be sought, where appropriate, to achieve public access. The City Corporation will refuse schemes which do not provide an adequate assessment of a site, make any provision for the incorporation, safeguarding or preservation of significant monuments or remains, or which would harm or adversely affect those monuments or remains. Where display of a monument or archaeological remains would harm the heritage asset or make it vulnerable and reburial is necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.

6.4.23. A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be controlled using conditions and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

Policy HE3: Setting of the Tower of London World Heritage Site

1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and connectivity.

Reason for the policy

6.4.24. The Tower of London is a UNESCO World Heritage site of Outstanding Universal Value. While the Tower itself is within the London borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to accessibility for non-motorised road users.

Developments within a wider area may also affect the setting of the Tower, depending on their scale, form and location.

How the policy works

6.4.25. Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.

6.4.26. The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its heritage, while accommodating change.

6.5. Tall Buildings and Protected Views

Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD) in height.

2. Tall buildings of world class architecture and sustainable and accessible design will be permitted on suitable sites, having regard to:

- the potential effect on the City skyline, the wider London skyline and historic skyline features;
- the character and amenity of their surroundings, including the relationship with existing tall buildings;
- the significance of heritage assets and their settings;
- the provision of a high-quality public realm at street level; and
- the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.

3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.

4. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities at upper levels, available at no charge.

- 5. Tall buildings must not adversely affect the operation of London’s airports, nor exceed the Civil Aviation Authority’s maximum height limitation for tall buildings in central London.
- 6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul’s Heights area; St Paul’s protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.

Reason for the policy

6.5.1. The City contains many tall buildings, which help to enhance its environment and economy and contribute to London’s world city role. While tall buildings are a characteristic and iconic element of the City’s skyline, they must not adversely impact on the City’s unique environment or built heritage. Areas outside of the City may also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered.

6.5.2. Tall buildings are defined as those exceeding 75m AOD in height. Figure shows the current distribution of buildings exceeding 75m AOD in height in the City. The City Corporation is required to refer applications to the Mayor for buildings that exceed 150m above ground height across the City and 25m above ground height in the Thames Policy Area. The intention of this lower threshold is to preserve the open aspect of the river and the riverside public realm.

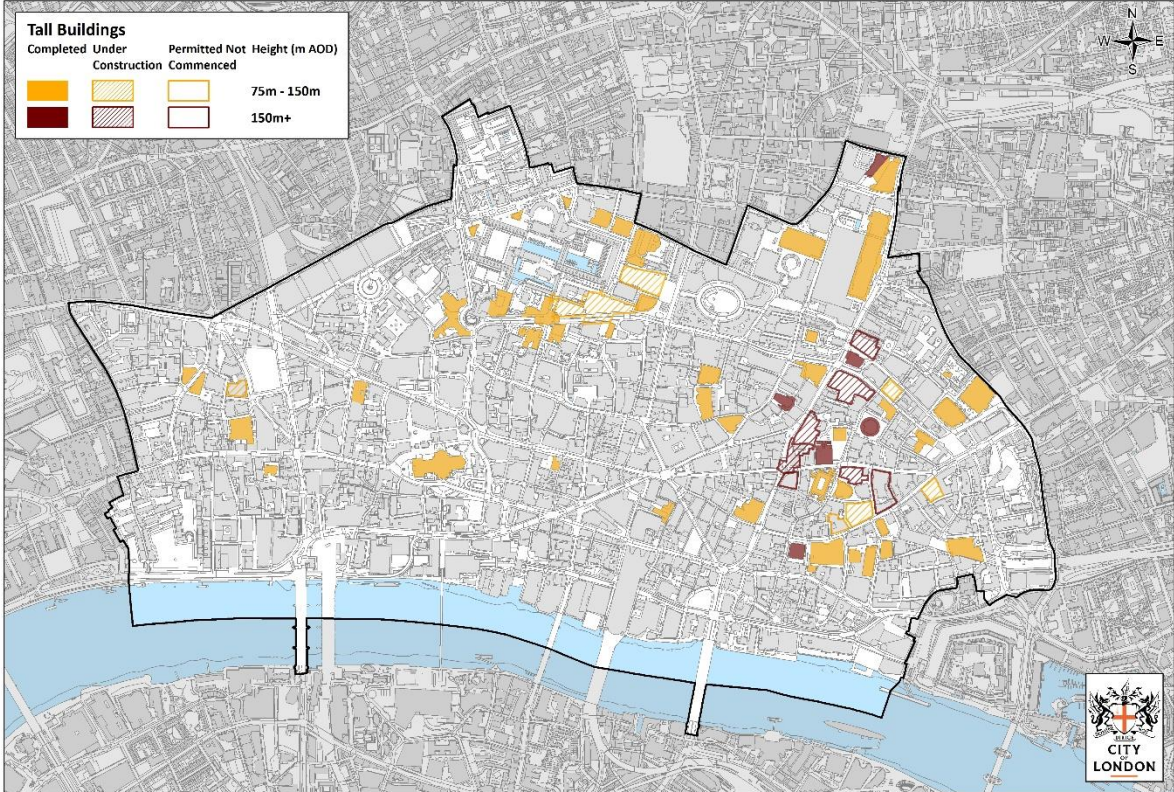


Figure 18: Tall buildings distribution in the City of London March 2017

6.5.3. Guidance issued by the Design Council/CABE and Historic England encourages local planning authorities to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate. The draft London Plan indicates that areas should be identified where new tall buildings will be an appropriate form of development in principle.

6.5.4. All of the City of London is sensitive to development of tall buildings, but outside of the City Cluster, there is limited scope for new tall buildings due principally to conservation area and views protection considerations. Figure identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies.

6.5.5. The City Cluster represents the most appropriate area for tall buildings in the City, but this does not mean that every site within the cluster is suitable. Any new tall building proposal must meet the criteria set out in the policy to enhance the City’s skyline, while minimising the impact on the surrounding area. Policy S20 provides more details about the considerations that apply to new tall building proposals in that area.

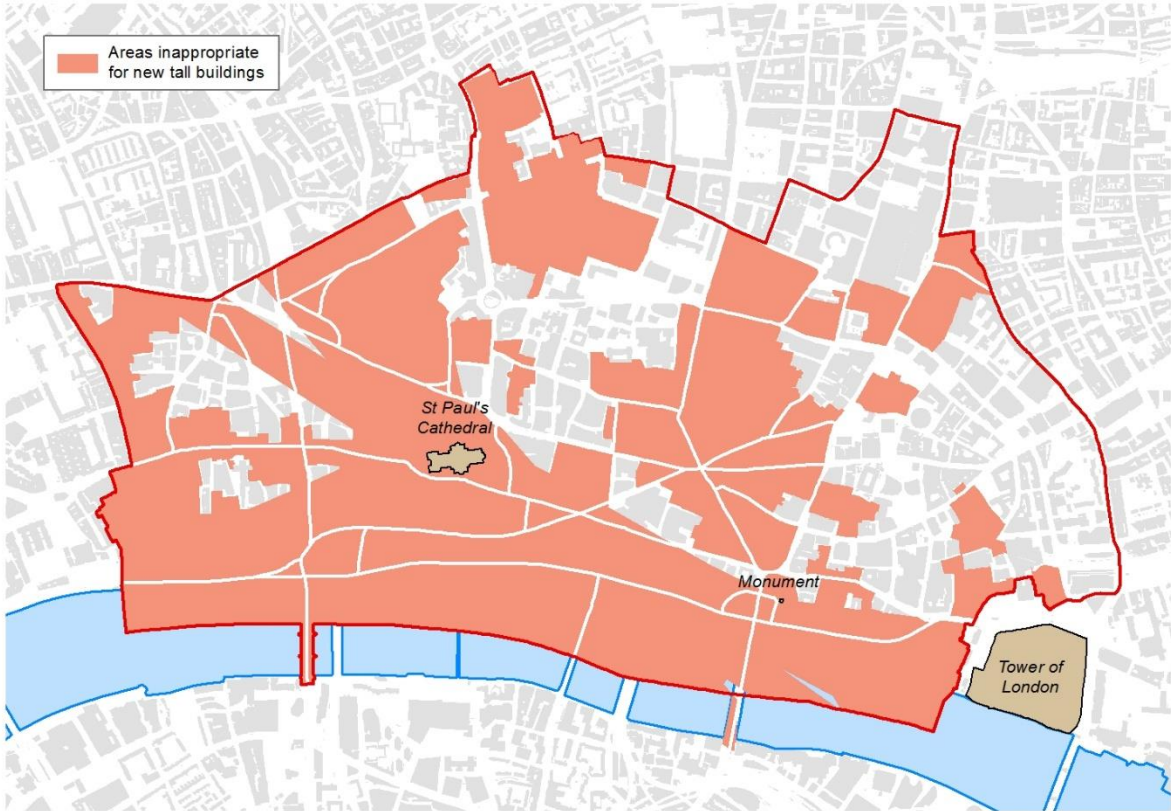


Figure 19: Areas inappropriate for new tall buildings

How the policy works

6.5.6. Tall buildings are high-profile developments, visible on the skyline across large parts of London. They represent the City’s built environment to a wide audience and should be designed to enhance the City’s skyline.

- 6.5.7. Tall building proposals must not adversely impact on the operation of London's airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority's (CAA's) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA regarding building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.
- 6.5.8. The development of tall buildings must take account of City Corporation Planning Advice Notes on the potential microclimate impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar convergence, sunlight and wind explaining how they should be considered as part of the design process.
- 6.5.9. Proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.
- 6.5.10. Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. Tall buildings should contain permeable ground floors which provide an active frontage, such as retail facilities. At upper levels, accessible public space which is available at no charge should be provided. This may comprise features such as retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries.

Strategic Policy S13: Protected Views

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
- Protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from Fleet Street; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features.
- Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).

Reason for the policy

6.5.11. 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. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. 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.

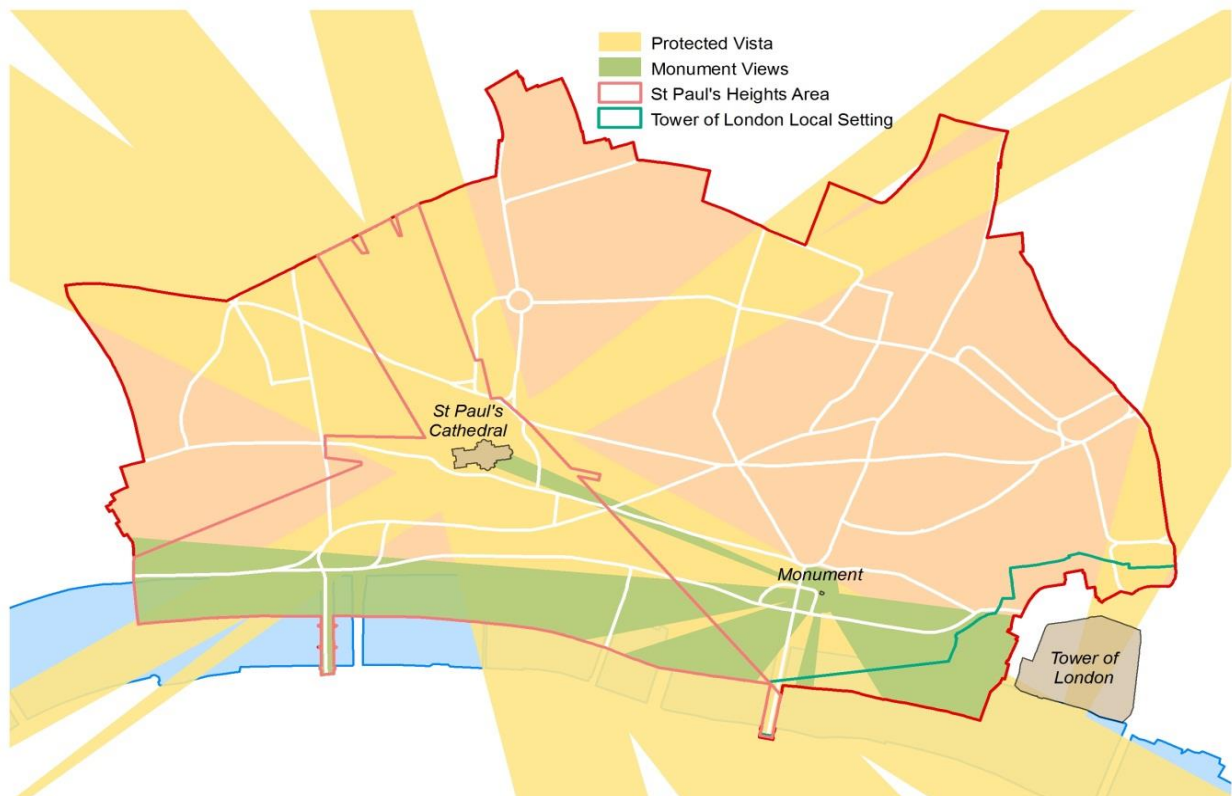


Figure 20: Areas covered by protected views

How the policy works

6.5.12. Protected Vistas are defined geometrically from an assessment point at the view location to the Strategically Important Landmark that is the focus of the protected vista. Each Protected Vista includes a Landmark Viewing Corridor, within which development should not exceed the height of the threshold plane. Beside and behind Landmark Viewing Corridor are the Wider Setting Consultation Areas, within which development that exceeds the threshold plane should not compromise the viewer's ability to recognise and appreciate the Strategically Important Landmark.

6.5.13. Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important

elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.

- 6.5.14. The LVMF defines a Protected Vista for the Tower of London. Any development in the Wider Setting Consultation Area in the background of this Protected Vista should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, it is likely that proposed new development in the City which exceeds the threshold plane will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.
- 6.5.15. The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.
- 6.5.16. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street which forms part of the processional route between Westminster and the City. The views of St Paul's change along the length of Fleet Street, depending on the topography and alignment of buildings. Development proposals visible from agreed assessment points should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the dome of St Paul's Cathedral, and that they maintain the current clear sky background profile of the dome. Further details will be set out in an update to the Protected Views SPD.
- 6.5.17. New development proposals should form attractive features in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE and Historic England.
- 6.5.18. The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.

6.6. Open Spaces and Green Infrastructure

Context

6.6.1. The City of London is a busy urban environment containing many small open spaces and pocket parks. These spaces are vital to the success of the City, offering residents, workers and visitors outside spaces in which to work or to relax and appreciate the streetscape. There is a growing recognition that green infrastructure also helps to mitigate against some effects of climate change, provides benefits for well-being and mental health and improves air quality. These same small green spaces are essential for wildlife found in this urban setting. The policy seeks to provide further green infrastructure, open space provision and biodiversity within the City.

Strategic Policy S14: Open Spaces and Green Infrastructure

The City Corporation will work in partnership with developers, landowners and other agencies to promote a greener City by:

- Protecting existing open and green space;
- Seeking the provision of new open space through development, public realm or transportation improvements;
- Increasing public access to existing and new open spaces;
- Creating, maintaining and encouraging high quality green infrastructure;
- Using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
- Promoting the greening of the City through new development opportunities and refurbishments;
- Ensuring new development and refurbishment protect and enhance the City's biodiversity.

Reason for the policy

6.6.2. The City is densely built up and most of its open space provision consists of small spaces at street level. Green infrastructure in the City includes civic spaces, parks and gardens, cemeteries and churchyards, and green roofs and walls in addition to amenity spaces. A key environmental asset is the River Thames.

6.6.3. Open and green space is under increasing pressure due to the intensification of development, an expanding workforce and growing visitor numbers projected over the next twenty years.

6.6.4. The City of London Corporation is committed to protecting existing open spaces and expanding the provision of green infrastructure as far as possible consistent with heritage significance. The City Corporation wishes to see further urban greening to make the Square Mile more attractive to workers, residents

and visitors. This would contribute to the Mayor of London's ambition to make over 50 per cent of London green by 2050.

6.6.5. Given that space is at a premium in the City, all new developments and refurbishments will be required to include a greening element to the building and/or the public realm where consistent with good design. This approach will have many benefits over time such as improving the urban environment for biodiversity, reducing rainwater run-off, reducing air and noise pollution, regulating temperature, and making the City a more desirable business location by improving visual amenity. Public access to greening elements should be achieved wherever possible.

How the policy works

6.6.6. The City of London Corporation will work with developers and landowners at all stages of the development process and actively monitor developments from pre-application stage through to post completion to ensure that the highest standards of green infrastructure are achieved, and existing provision is improved.

Open Spaces

Policy OS1: Protection and provision of open spaces

The quantity, quality and accessibility of public open space will be maintained and improved.

- Existing open space will be protected, particularly that of historic interest. Where a loss of existing open space is proposed, it will be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site;
- Additional publicly accessible open space and pedestrian routes will be sought in major commercial and residential developments wherever practical but particularly in areas of open space deficiency and where pedestrian modelling shows significant pressure on City streets;
- Further civic spaces will be created from underused highways and other land;
- Public access will be secured, wherever possible, to existing and proposed private spaces;
- Access to new and existing open spaces will be improved;
- Open spaces must be designed to meet the needs of all the City's communities.

Reason for the policy

6.6.7. The City of London has 376 open spaces totalling 32 hectares which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway. Most of the open spaces are small, with

approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare.

How the policy works

- 6.6.8. Many open spaces in the City are of historic value, such as churchyards, while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquillity, agile working, leisure and sport, and to increase biodiversity.
- 6.6.9. The provision of open space across the City is uneven. The northern area of the City contains just over half of all the open space in the City, due to the relatively large amounts of space in the Barbican and Golden Lane estates and the Broadgate commercial estate. There is significant open space along the Thames and the riverside, with the Riverside Walk, the Temples legal precinct and space close to the Tower of London. A new public open space will be created at Blackfriars foreshore as a result of the Thames Tideway Tunnel project. Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area and the City Cluster areas have the lowest percentages of open space and face pressure from the increasing employment and pedestrian flow numbers associated with commercial intensification (see Figure 17)
- 6.6.10. There is intense pressure on all the City's open spaces particularly at lunchtimes and new development provides an opportunity to create additional open space in and around buildings. These spaces should be designed for multiple uses, be maintained in a cleanly condition and to a high standard and be resilient to future climate conditions.

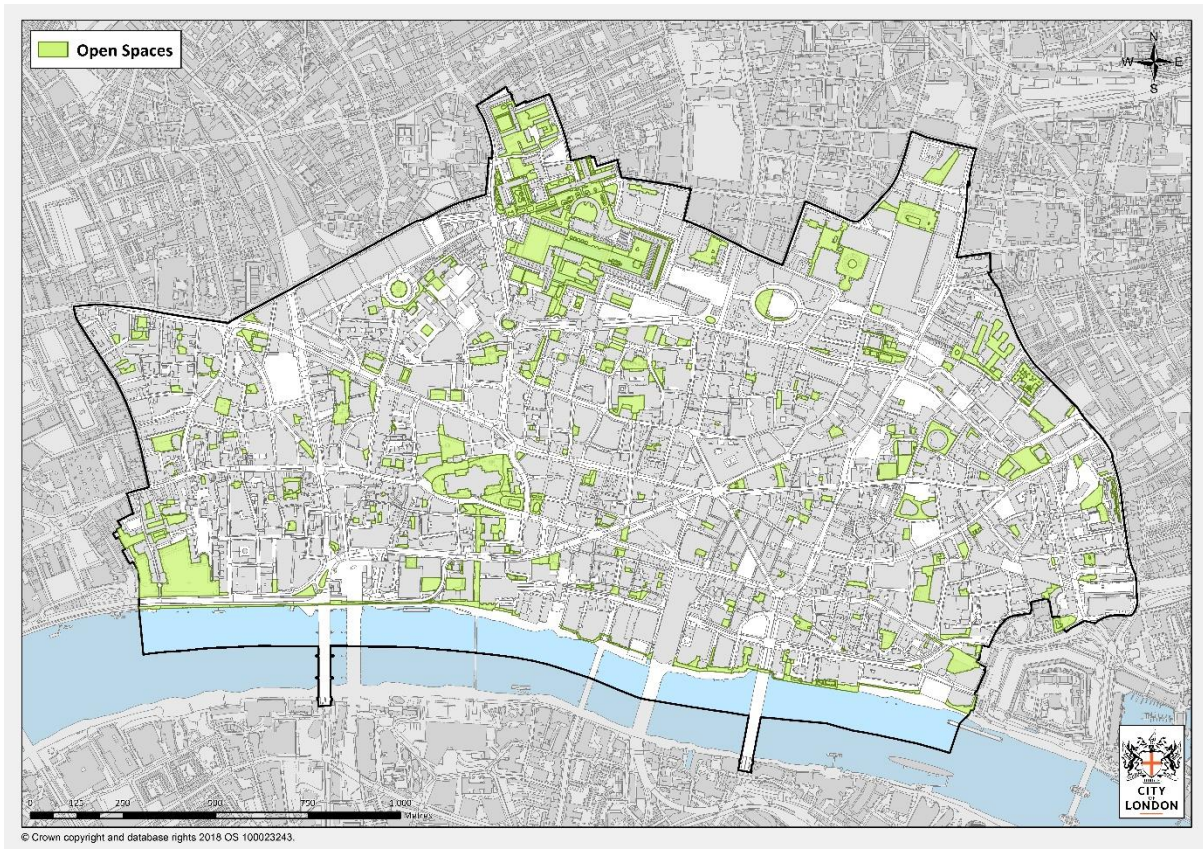


Figure 21: Open Spaces in the City of London

Policy OS2: City Greening

1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.

- All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context; and
- The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought but any new development should not compromise these elements on existing buildings located nearby.

2. Major development proposals will be required expected to:

- Demonstrate Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City's target UGF score of 0.3 as a minimum; and
- Submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building.

Reason for the policy

6.6.11. Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity enhancement, recreation, and

health and wellbeing of the City's communities. This will increase in importance as weather patterns continue to change with rising average temperatures, summer droughts and more intense rainfall events periodically through the year. The inclusion of blue infrastructure such as rain gardens and rainwater harvesting can help to minimise water use.

6.6.12. Evidence demonstrates a positive correlation between urban greening and good mental and physical health. However, the provision of large green spaces in the City's high-density urban environment is difficult to achieve. Small areas of soft landscaping, green walls and green roofs, associated with buildings and the public realm, will therefore play a vital role in promoting wellbeing. Increased access to green spaces will be encouraged.

6.6.13. The City of London Corporation has long championed green roofs and continues to actively encourage them, but other forms of greening are less common in and around new buildings. The provision of trees and landscaping, and vertical greening such as green walls is also welcome. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they require careful design and installation and regular maintenance.

6.6.14. Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.

6.6.15. There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers prefer to install intensive green roofs with deep substrates for amenity space, these are expected to be of high quality design incorporating rainwater harvesting for irrigation to minimise water use.

6.6.16. The green roof should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately to maximise the roof's environmental benefits including biodiversity, rain water run-off attenuation and building insulation.

How the policy works

6.6.17. This policy provides a mechanism for ensuring a consistent approach to greening for all new buildings and public realm schemes. It takes account of the value of different types of greening through the application of an Urban Greening Factor (UGF), with a higher UGF for greening that provides multiple benefits.

- 6.6.18. The Draft London Plan introduced a UGF scoring system for London, which is intended to operate as a tool to assess the amount, type and value of greenery within development proposals. It recommends interim target scores, pending work by individual boroughs to develop their own approaches tailored to local circumstances.
- 6.6.19. The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City. Policy OS2 therefore requires major development proposals in the City (commercial and residential) to include an UGF calculation demonstrating how it will meet the minimum UGF target of 0.3.
- 6.6.20. Developers will need to provide evidence to justify why the UGF target cannot be met. The City Corporation will take a flexible approach where delivery of the target UGF would detract from the heritage significance of a building or conservation area.
- 6.6.21. Development proposals could include greening of roofs, facades, terraces and balconies, both internal and external, and/or landscaping around the building depending on the circumstances of each site. The UGF assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development.
- 6.6.22. More details including a worked example of a UGF calculation are set out in Appendix 1 of the Local Plan.

Biodiversity

Policy OS3: Biodiversity

Development should incorporate measures to enhance biodiversity, including:

- Retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
- Measures recommended in the City of London Biodiversity Action Plan in relation to particular species or habitats;
- Green roofs and walls, gardens and terraces, soft landscaping and trees;
- Green corridors and biodiversity links;
- Wildlife-friendly features, such as nesting or roosting boxes and beehives;
- A planting mix and variation in vegetation types which encourages biodiversity;
- Planting which will be resilient to a range of climate conditions, with a high proportion of native plants.

Reason for the policy

6.6.23. Protecting and improving biodiversity involves enhancing wildlife populations and their habitats. This has associated positive impacts to the environment, economic and social life of the City and the aesthetics of the streetscape. Healthy biodiversity can be viewed as a sign of a healthy environment and healthy city.

6.6.24. The City has 13 Sites of Importance for Nature Conservation (SINCs), including three new SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were designated following a review in 2016. Two existing SINCs were upgraded as part of this review: Barbican and St Alphage Garden, which includes the Fann Street Wildlife Garden and the Beech Gardens, and The Roman Wall, Noble Street, which was extended to include St Anne and St Agnes Churchyard.

6.6.25. A number of areas along the riverside, west of Farringdon Street and east of Bishopsgate have been identified as areas of deficiency in nature conservation by the GLA. It is important that opportunities are taken to improve biodiversity throughout the City, and particularly in areas where this would improve green corridors or biodiversity links, such as along the riverside. The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species.

How the policy works

6.6.26. Measures to enhance biodiversity should address the need to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles) and by extension a wider range of insects and birds.

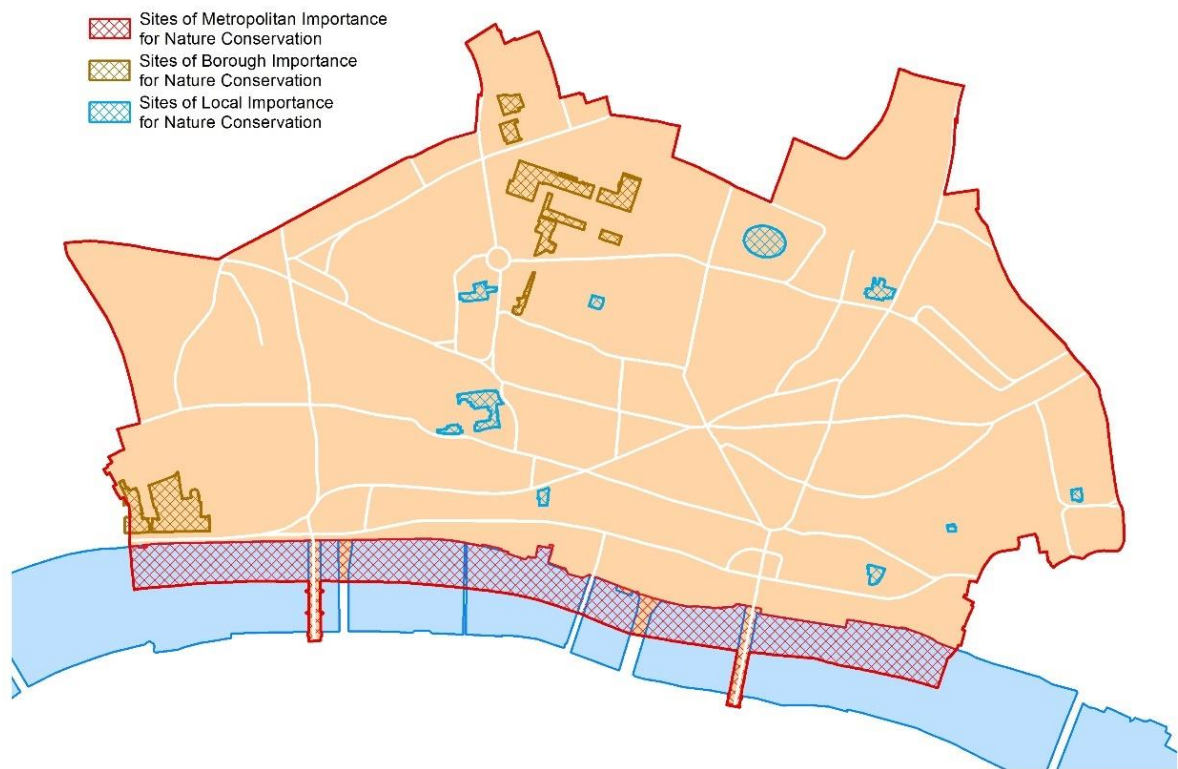


Figure 22: Sites of Importance for Nature Conservation (SINCs)

6.6.27. New developments should seek to protect and enhance biodiversity and the City's environmental assets. This can be achieved by providing spaces for biodiversity to flourish through the planting of trees and soft landscaping, along with green roofs and walls where possible. A variety of these provisions in one development will create habitats for a range of different wildlife species. Joined up green spaces and corridors give species a better chance of survival in the urban landscape and greater resilience to future climate change. These measures will assist in the delivery of the London wide Green Grid.

6.7. Climate Resilience and Flood Risk

Context

6.7.1. This section aims to ensure that the City remains resilient in the face of changing climate patterns. The main focus is on flood risk and the risk of overheating of buildings and spaces which will become more frequent as a result of climate change.

6.7.2. The UK Climate Projections (CP09) predict that London will experience a rise in mean temperatures of between 0.6°C and 2.7°C by 2050. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review.

Strategic Policy S14: Climate Resilience and Flood Risk

Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

- Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;
- Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
- Flood defence structures must be safeguarded and enhanced to maintain protection from climate related sea level rise.

Reason for the policy

6.7.3. Today's new buildings will be in place for several decades, therefore they must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will keep the City safe and comfortable as climate patterns change.

6.7.4. Although the total annual rainfall will remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.

6.7.5. The City lies within the tidal section of the Thames and is therefore vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan identifies the need for the existing flood defences in central London to be raised by up to 1 metre between 2065 and 2100 to protect London from flooding.

How the policy works

6.7.7. The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making. UK Climate Projections will form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.

6.7.8. Developers will be expected to show that their proposals have taken account of predicted climate change and will minimise the impacts of changed climate patterns on future occupants and the City's communities.

Policy CR1: Overheating and Urban Heat Island Effect

1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:

- solar shading to prevent solar gain, particularly on glazed facades;
- urban greening to improve evaporative cooling;
- passive ventilation and heat recovery;
- use of thermal mass to moderate temperature fluctuations;
- minimal reliance on energy intensive cooling systems.

2. Building designs should minimise any contribution to the urban heat island effect.

Reason for the policy

6.7.9. Development presents an opportunity to renew or adapt existing building stock to provide buildings and public spaces which will cope better with changing climate patterns. Design measures should be employed to reduce energy demands from cooling infrastructure, making buildings more resilient in the face of higher temperatures. Measures such as urban greening can have a positive impact near the building, minimising the urban heat island effect (see Policy OS2).

6.7.10. Climate adaptation measures can contribute to wider benefits by pre-empting potential detrimental climate impacts. Careful selection of plants which are resilient to a range of weather conditions will assist wildlife to survive changed climate conditions. Urban greening and reduced reliance on air conditioning will have benefits for the City's air quality.

How the policy works

6.7.11. For all major development, the City Corporation will expect climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate reduced energy demand for cooling. BREEAM credits for adaptation to climate change should be targeted.

6.7.12. For minor development, the Design and Access Statement should include details of climate resilience measures.

Policy CR2: Flood Risk

All development within the City Flood Risk Area and major development elsewhere, must be accompanied by a site-specific flood risk assessment demonstrating that:

- the site is suitable for the intended use, in accordance with the sequential and exceptions tests (see table XX) and with Environment Agency and Lead Local Flood Authority advice;
- the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere;
- safe access and egress routes are identified;
- flood resistance and resilience have been designed into the proposal.

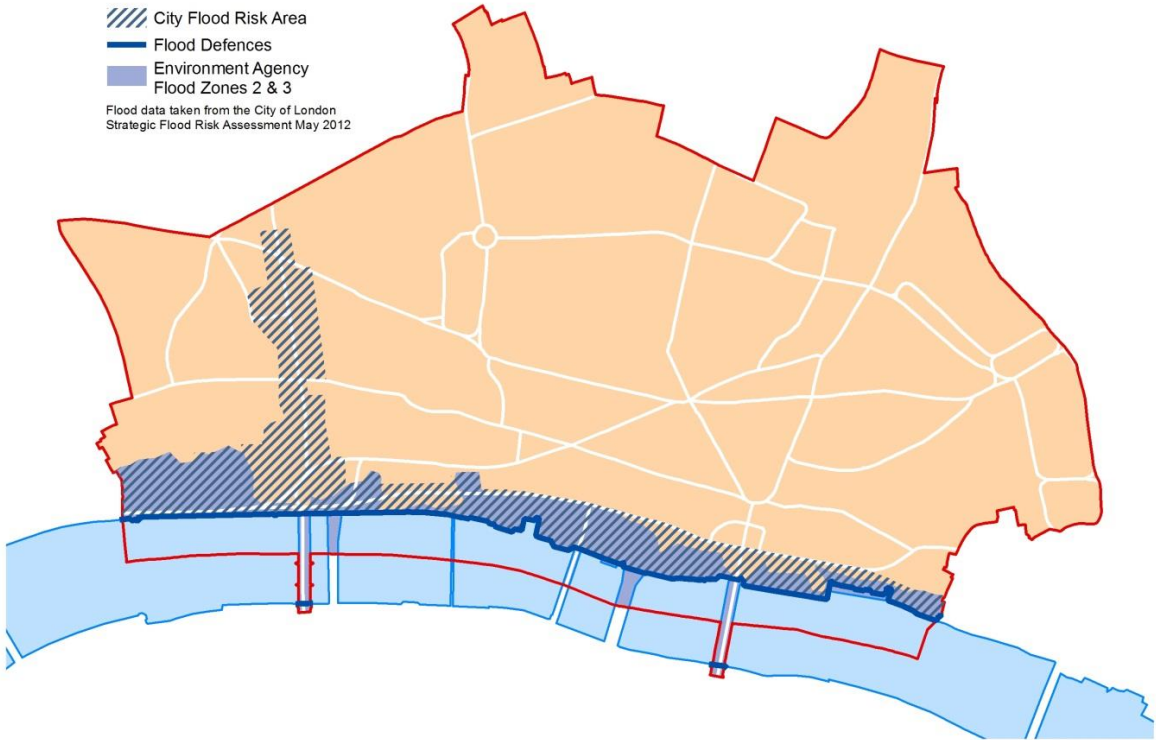


Figure 23: City Flood Risk Area

Reason for the policy

6.7.13. While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water/sewer overflow in the former Fleet valley.

6.7.14. Figure 23 identifies the areas at risk from these sources as the City Flood Risk Area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

How the policy works

6.7.15. Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development and where feasible and viable may be required to provide protection from flooding for properties beyond the site boundaries.

6.7.16. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 2 shows the vulnerability classifications and Table 3 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. Full details of the Environment Agency's flood zones are shown on the policies map.

6.7.17. If the intended use of a site falls into one of the categories where an Exceptions Test is required as set out in Table 3, the developer will need to investigate whether there is a reasonably available site outside the City Flood Risk Area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the Exceptions Test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Essential Infrastructure	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations
Highly Vulnerable	<ul style="list-style-type: none"> • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Installations requiring hazardous substances consent.
More Vulnerable	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as care homes and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Sites used for waste management facilities for hazardous waste.
Less Vulnerable	<ul style="list-style-type: none"> • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure. • Police, ambulance and fire stations which are not required to be operational during flooding. • Waste treatment (except hazardous waste facilities).
Water-compatible development	<ul style="list-style-type: none"> • Flood control infrastructure. • Docks, marinas and wharves. • Navigation facilities. • Water-based recreation (excluding sleeping accommodation). • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

Table 2: Flood risk vulnerability classifications relevant to the City

Source: Relevant uses from Planning Practice Guidance – Flood Risk and Coastal Change

Flood Risk Vulnerability classification	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
EA Zone 1	✓	✓	✓	✓	✓
EA Zone 2	✓	Exceptions Test required	✓	✓	✓
EA Zone 3a	Exceptions Test required	x	Exceptions Test required	✓	✓
EA Zone 3b	Exceptions Test required	x	x	x	✓
SFRA Surface water/sewer flood risk areas	Exceptions Test required	x	Exceptions Test required	✓	✓

Table 3: Suitability of different uses in flood zones

Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

6.7.18. The City of London Strategic Flood Risk Assessment (SFRA) provides guidance on suitable flood resistance measures, to prevent water entering the building, and flood resilience measures, which enable speedy recovery in the event of flooding. These should be specified for all development within the City Flood Risk Area. Passive design measures such as suitable threshold levels and the use of flood resilient materials will be favoured over active measures such as removable flood barriers.

6.7.19. Design measures can help to reduce flooding, thus protecting the local area beyond the development site through:

- sustainable drainage systems;
- green/blue roofs; and
- rainwater reuse, recycling and attenuation

6.7.20. Resistance to flooding can be achieved through design measures such as:

- raised kerbs and altered topography which contains water at a distance from the building;
- avoiding opening windows or vents at ground floor or basement levels;
- using low permeability materials to limit water penetration of external walls, and flood resistant doors to prevent water ingress; and
- fitting non-return valves on plumbing to prevent sewer surcharge within the building.

6.7.21. Flood resilience measures make clean up after a flood more efficient, and include:

- avoiding locating sensitive equipment such as computer servers at lower levels of buildings in flood prone areas;
- locating all fittings, fixtures and services at a suitable height to minimise damage by flood waters;
- using impermeable surfaces and structures; and
- providing sumps and soak-aways that gradually release water to the sewer network.

6.7.22. In order to demonstrate that the development will be safe for occupants, flood warning and evacuation plans should be provided for all 'more' or 'highly' vulnerable development within the City Flood Risk Area. Details of the type of measures which should be included in an evacuation plan are set out in the City's SFRA.

6.7.23. For minor development outside the City Flood Risk Area, an appropriate flood risk statement should be included in the Design and Access Statement.

Policy CR3: Sustainable drainage systems (SuDS)

1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as close as possible to greenfield rates and the number of discharge points has been minimised.

3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.

Reason for the policy

6.7.24. The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City Flood Risk Area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.

6.7.25. More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

How the policy works

6.7.26. All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.

6.7.27. For major development, pre-application discussion with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the Environment Agency, Thames Water and other interested parties is encouraged to ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan Drainage Hierarchy and local requirements set out in the City Corporation's forthcoming SuDS guidance.

6.7.28. Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.

6.7.29. For all major development, a separate SuDS and Drainage Plan must be submitted at application stage. For minor development the Design & Access Statement should include details of how rainwater run-off has been minimised.

Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.

6.7.30. Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.

6.7.31. Arrangements for maintenance must be considered in the designs. Planning conditions may be used to secure a suitable operations and maintenance plan.

Policy CR4: Flood protection and flood defences

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm.

Reason for the policy

6.7.32. The City of London is protected from flooding by the Thames Barrier, and more locally by flood defence walls along the River Thames. The Thames Estuary 2100 project recognises the need for the raising of flood defences by up to 0.5m by 2065 and 1m by 2100.

How the policy works

6.7.33. Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future defence raising without adverse impacts on river views and pedestrian movement along the riverside walk. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences.

6.7.34. A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

6.8. Circular Economy and Waste

Context

6.8.1. The City Corporation is the Waste Planning Authority (WPA) for the Square Mile, with a statutory duty to plan for all the waste that is generated in the City. With no waste treatment plants in the City, the City Corporation relies on WPAs elsewhere to provide such facilities. By applying circular economy and waste hierarchy principles: designing for durability and modularity, making better use of under-used assets through sharing, reusing products and materials and recycling as much as possible, waste can be designed out. This approach will reduce waste exports from the City whilst application of the proximity principle will ensure that residual waste is processed as close as possible to the City.

Strategic Policy S15: Circular Economy and Waste

1. The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities in planning for capacity to manage the City's residual waste through:
 - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other London Waste Planning Authorities;
 - Co-operating with Waste Planning Authorities within and beyond London to plan for suitable facilities for the City's waste;
 - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste;
 - Monitoring waste movements to and from the City and reviewing its waste arisings and capacity study at least every five years.

Reason for the policy

6.8.2. The City Corporation has responsibility to plan for adequate facilities to manage the waste that originates in the City. This includes waste collected from the City's households and businesses, waste generated in the process of redevelopment and hazardous waste from premises such as St Bartholomew's Hospital.

6.8.3. The London Plan and the London Environment Strategy set the framework for waste management in London. These strategies promote circular economy principles and the waste hierarchy: prevention, preparing for reuse, recycling, other recovery, and disposing only as a last resort.

6.8.4. The current London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage 100,000 tonnes of waste annually until 2036. In the draft London Plan, the proposed apportionment for the City is

reduced to 84 tonnes per annum in 2021 and 89 tonnes per annum in 2041. This figure represents the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's household and commercial and industrial waste from 2026.

- 6.8.5. The London Plan sets out criteria for the selection of waste management sites, which the City of London *Waste Arisings and Waste Management Capacity Study review 2016* used to evaluate potential sites in the City. This study concludes that, with current technologies and economic considerations, there is no viable waste management capacity within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries.
- 6.8.6. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum and will work with the GLA and the Environment Agency to improve waste planning.
- 6.8.7. For commercial reasons, a proportion of the City's waste will continue to be transported to sites outside London. This includes construction, demolition and excavation (CD&E) waste which is not covered by the Mayors targets for net self-sufficiency. Annual monitoring of such waste exports will inform Duty to Co-operate discussions with receiving authorities within and outside London to ensure that sufficient capacity remains in the planning pipeline.
- 6.8.8. The London Plan sets out borough apportionments for land-won aggregates which should be reflected in local plans. No apportionment is made for the City of London and there is no requirement to include a policy for minerals within the Local Plan
- 6.8.9. It is imperative that the City adopts circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment.

How the policy works

- 6.8.10. The City Corporation will continue to monitor the quantities and types of waste originating in the City and work with the City's communities to minimise this waste. The City Corporation will continue to work with the South-East London Waste Planning Group and other Waste Planning Authorities in London and beyond to ensure that the City's waste apportionment is met and that

suitable facilities are available for the City's waste to be managed in the most sustainable way.

6.8.11. Changing economics and new waste management technologies means that small scale waste management is becoming more viable within the City, particularly within large development sites.

6.8.12. During the period 2018 – 2036 a proportion of the City of London's waste will continue to be managed outside London. Co-operation with waste planning authorities outside London will aim to ensure that facilities with sufficient capacity remain available to accept the City's waste during this period.

6.8.13. The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.

Policy CEW1 Zero Waste City

1. Development should be designed to promote circular economy principles throughout the life cycle of the building through:

- Flexible building design to accommodate evolving working and living patterns reducing the need for redevelopment;
- Re use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources;
- Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials.
- Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage
- Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.

2. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.

Reason for the policy

6.8.14. The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle,

reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.

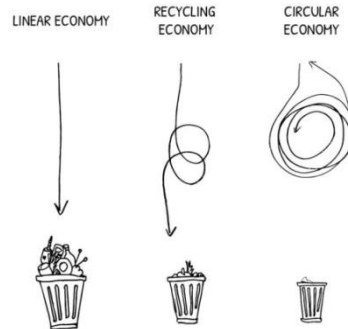


Figure 24: Circular Economy

6.8.15. The design of buildings impacts on the potential for implementation of the waste hierarchy during their operational stage, through the facilities and waste management services that are incorporated into the design. For example, reliance on single use, coffee cups and disposable plastics can be reduced by incorporating kitchen facilities and water fountains into building designs and waste movements can be reduced by managing food waste on-site through composting or anaerobic digestion. These facilities must be considered at the building's design stage.

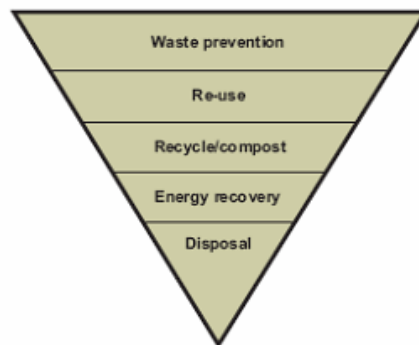


Figure 25: Waste Hierarchy

6.8.16. Waste prevention is the most desirable action on the waste hierarchy as it results in no waste whatsoever. Re-use is the next most desirable option as it involves products and materials being used again for their original intended purpose. Recycling is the next most preferable option, involving the collection of used items and processing them into raw materials to be remanufactured into usable products or materials. The recovery of energy, through techniques such as anaerobic digestion, is a way of getting the most out of otherwise useless waste. Disposal should be the absolute last resort, after all the other options have been exhausted.

6.8.17. On large sites opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and

beyond the City. The City of London Waste Arisings and Capacity Study identifies a range of options which should be considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.

6.8.18. Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage in the design of developments to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be considered, where necessary.

How the policy works

6.8.19. Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged.

EIA Development

6.8.20. For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should fully address how construction, demolition and excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.

Other Major development

6.8.21. For all other Major development proposals, the sustainability statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.

All other development

6.8.22. For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development. The Environmental Statement (for EIA applications) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

6.8.23. Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such

areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments including short-term-lets must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.

6.8.24. The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.

Policy CEW2: Sustainable Waste Transport

The environmental impact of waste transport will be minimised through:

- Encouraging the use of the river for removal of waste, including deconstruction waste and delivery of construction materials;
- Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;
- Requiring low and zero emissions transport modes for waste movement;
- Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi- site consolidation of waste.

Reason for the policy

6.8.25. The proximity principle advocates that waste should be managed as close as possible to where it originates, to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.

6.8.26. Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.

6.8.27. This policy aims to maximise the use of the River Thames for waste transport, encourage transport modes such as rail and other waterways and encourage efficient use of low and zero emissions road vehicles for transporting waste.

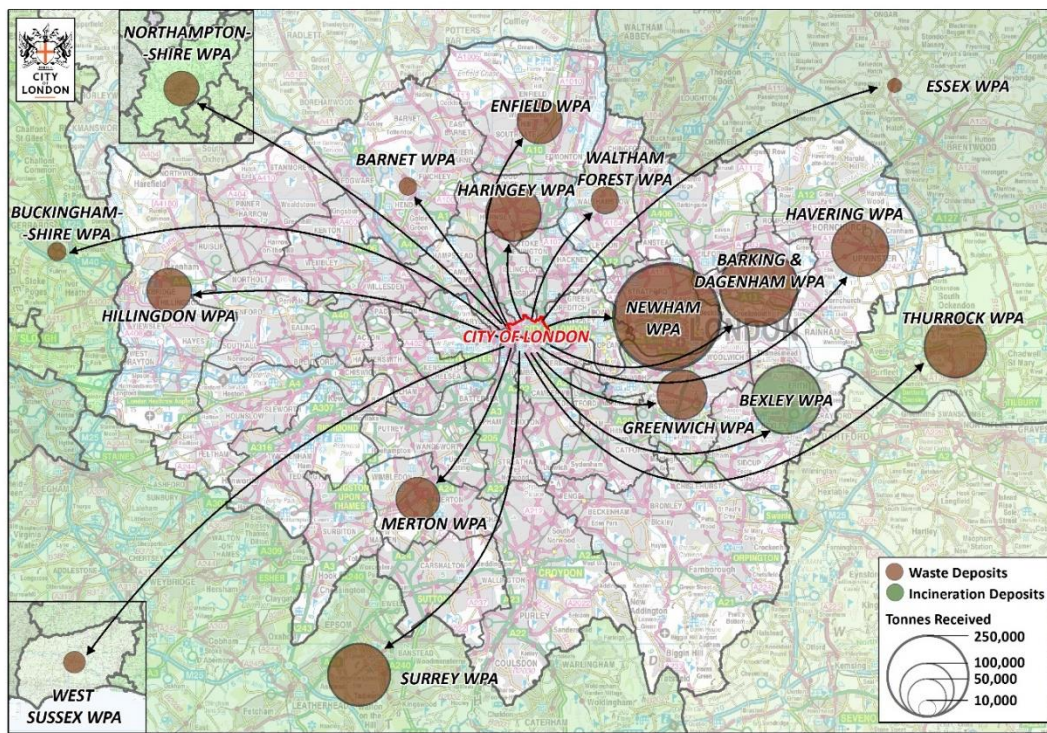


Figure 26: Destinations for the City's waste 2012-2016

How the policy works

6.8.28. Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be taken into account in consideration of proposals. Mitigation may be necessary to allow development to proceed where a potential conflict is identified.

6.8.29. The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste.

Major development

6.8.30. Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles enabled during the operational phase of the building's life.

6.8.31. All other development Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed

Policy CEW3: New waste management sites

1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:

- the development will handle waste which has been generated locally;
- access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
- the carbon impact of the development will be minimised. New waste facilities should comply with the Mayor's Carbon Intensity Floor (CIF);
- the development is designed with resilience to natural and man-made safety and security challenges.

2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf and development which would compromise the use of the river for waste operations, will be resisted

3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.

Reason for the policy

6.8.32. Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

How the policy works

6.8.33. The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and appropriate conditions will be applied to ensure that any new facility is suitable for the City's high density urban environment.

7. Key Areas of Change

Introduction

- 7.1.1. This section of the Plan sets out area-based policies and proposals relating to seven 'Key Areas of Change', together with an overarching policy which applies to the whole of the City's riverside. The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus.
- 7.1.2. Identifying Key Areas of Change provides a policy framework for bringing forward beneficial change within those areas, including the delivery of key development schemes, improving accessibility and the quality of the public realm, and introducing new uses or mixes of uses. The Key Areas of Change also provide a strategic context for the development of projects and funding bids by a range of City Corporation departments and external partners.
- 7.1.3. The Key Areas of Change are shown indicatively on the Key Diagram and on the individual diagrams that accompany each area policy.

7.2. Thames Policy Area

Context

- 7.2.1. The River Thames is an iconic feature of London that forms the southern boundary of the City and plays a major role in its prosperity and everyday life. The riverside provides a breathing space from the busy environment which characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames.
- 7.2.2. The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City and a Site of Metropolitan Importance for Nature Conservation. The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.
- 7.2.3. The London Plan requires the City's Local Plan to designate, and ensure the maintenance of, a Thames Policy Area and to take account of emerging Maritime Spatial Plans prepared by the Marine Management Organisation. Policy S16 sets out the policy considerations which apply to the whole of the City's riverside, as defined on the Policies Map. Further detailed guidance is provided in the City Corporation's Thames Strategy SPD. The City Corporation's Riverside Walk Enhancement Strategy sets out its plans for public realm enhancement along the riverside, and the riverside walk forms part of the Thames Path National Trail.
- 7.2.4. The River Thames changes character on its way through the City, as it does through London. It includes areas where very limited change is likely to occur, such as at The Temples. However, two areas, at Blackfriars and the Pool of London, have been identified as Key Areas of Change because they are places where regeneration is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. Policies relating to Blackfriars and the Pool of London follow the overarching policy for the Thames Policy Area.

Strategic Policy S16: Thames Policy Area

The unique character of the City's riverside, and its functional uses for transport and recreation, will be enhanced by:

1. Designating the Thames Policy Area and preparing and keeping under review a Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.
2. Co-operating with neighbouring boroughs to develop a joint Thames Strategy for the central section of the River Thames.

3. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk Enhancement Strategy, particularly through:

- protecting public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe;
- improving access to the River Thames and riverside walk from the rest of the City;
- improving the vibrancy of the riverside by encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value;
- supporting the Illuminated River project to deliver more sustainable bridge lighting and engage visitors with the River.

4. Supporting and safeguarding land for the construction of the Thames Tideway Tunnel.

5. Promoting the functional use of the River Thames and its environs for transport, navigation and recreation, particularly through:

- Safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
- encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
- resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river-related purpose and not have a detrimental impact on navigation or the environment;
- maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

Reason for the policy

7.2.5. There are a range of different strategies and plans which affect the Thames including:

- The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area.

- The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues.
- The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements.
- The emerging South East Marine Plan produced by the Marine Management Organisation, which will provide a wider strategic context.

7.2.6. The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

7.2.7. The draft London Plan notes that no joint strategy currently exists for the central section of the Thames between Chelsea and Tower Bridge, and the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy.

7.2.8. A key infrastructure project is the development of the Thames Tideway Tunnel, which is a 25km tunnel running mostly under the tidal section of the River Thames through central London. It is intended to capture and divert storm overflows, including the Fleet Combined Sewer Outflow at Blackfriars, to Beckton Sewage Treatment Works to avoid discharging them into the river. Construction works started in 2016 and will run into the early 2020's.

7.2.9. The 'Illuminated River Project' is an art installation that involves the architectural illumination of bridges across central London. The project will animate the river and create further opportunities to develop the riverside walk for the enjoyment of visitors and London communities. The scheme will incorporate 15 bridges in total, of which six are partly or wholly in the City of London.

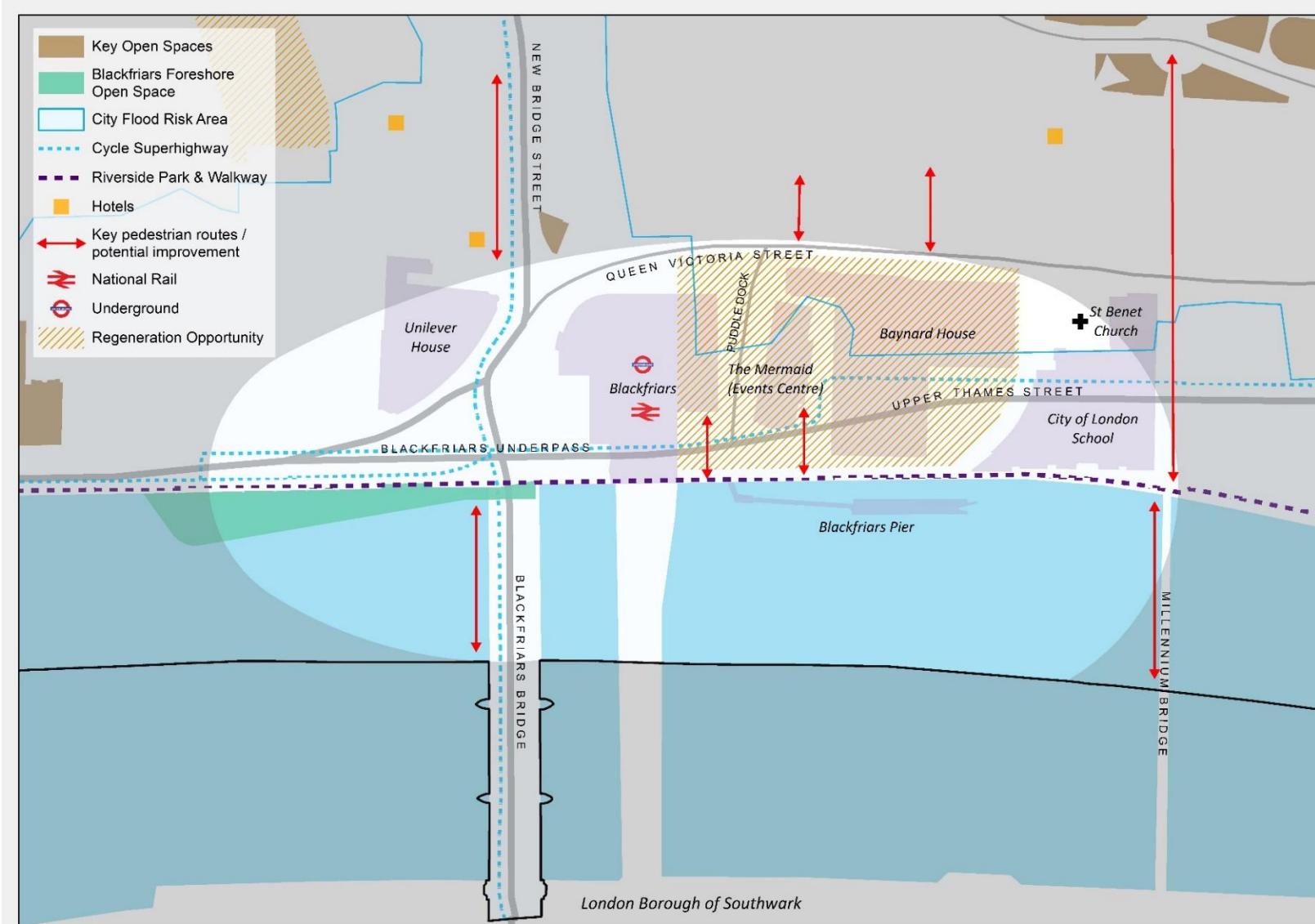


Figure 27: Blackfriars Key Area of Change

7.3. Blackfriars Key Area of Change

Context

7.3.1. The area contains a mix of uses, including offices, the City of London School, the Mermaid Events Centre, the Church of St Benet Paul's Wharf, a public Car Park, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, little or no active frontages and a lack of open space.

7.3.2. It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the riverside walk from the rest of the City. Access to the riverside walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark and Blackfriars Station is a major Underground and Rail station.

7.3.3. There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new public space built out into the river west of Blackfriars Bridge. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views.

Strategic Policy S17: Blackfriars

The character and amenities of the Blackfriars Key Area of Change will be enhanced by:

1. Promoting substantial redevelopment or refurbishment of existing post-war buildings to provide new high-quality office and commercial accommodation with active frontages at ground floor level;
2. Implementing the Thames Tideway Tunnel project and creating a high-quality new public open space at Blackfriars Bridge foreshore;
3. Enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside and the provision of new and improved links across Upper Thames Street;
4. Encouraging cultural events, arts and play in public spaces;
5. Improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of St Benet Paul's Wharf.

Reason for the policy

7.3.4. This area contains some post-war development which is underused and does not contribute to the context or setting of its location. Except for the area

adjacent to Blackfriars Station, this part of the City lacks vibrancy and due to the road network is notable for a relative lack of pedestrian permeability. Blackfriars has been identified as a Key Area of Change to facilitate beneficial commercial redevelopment, although this may be a medium or longer-term option due to existing leasehold arrangements.

7.3.5. Baynard House is a large office site and data centre, which includes a public car park. It is key to the potential regeneration of Blackfriars, since redevelopment of this site would provide an opportunity to improve the quality of architecture and sense of place, to redesign the road network to reduce the dominance of vehicular traffic and to achieve direct pedestrian routes to the riverside.

7.3.6. Significant redevelopment would provide an opportunity for public realm improvements along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. New active frontages will be sought as an integral part of any redevelopment. Pedestrian links across Upper Thames Street will be improved wherever possible to link the riverside to the rest of the City and to provide easier access to Blackfriars Pier. Proposals for redevelopment and the redesign of streets would be required to enhance the setting of St Benet's Paul's Wharf and improve it as a pleasant area to visit and dwell.

7.3.7. The public open space created by the Thames Tideway Tunnel project at Blackfriars Bridge, will introduce additional greenery to the riverside and will bring more activity to the area by providing a new place for relaxation and recreation. This space will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new open space, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route between Blackfriars Bridge and Millennium Bridge. There is potential to enhance heritage assets and their setting by increased pedestrian permeability and there will be new views of Blackfriars Bridge and this part of the City from the new open space.

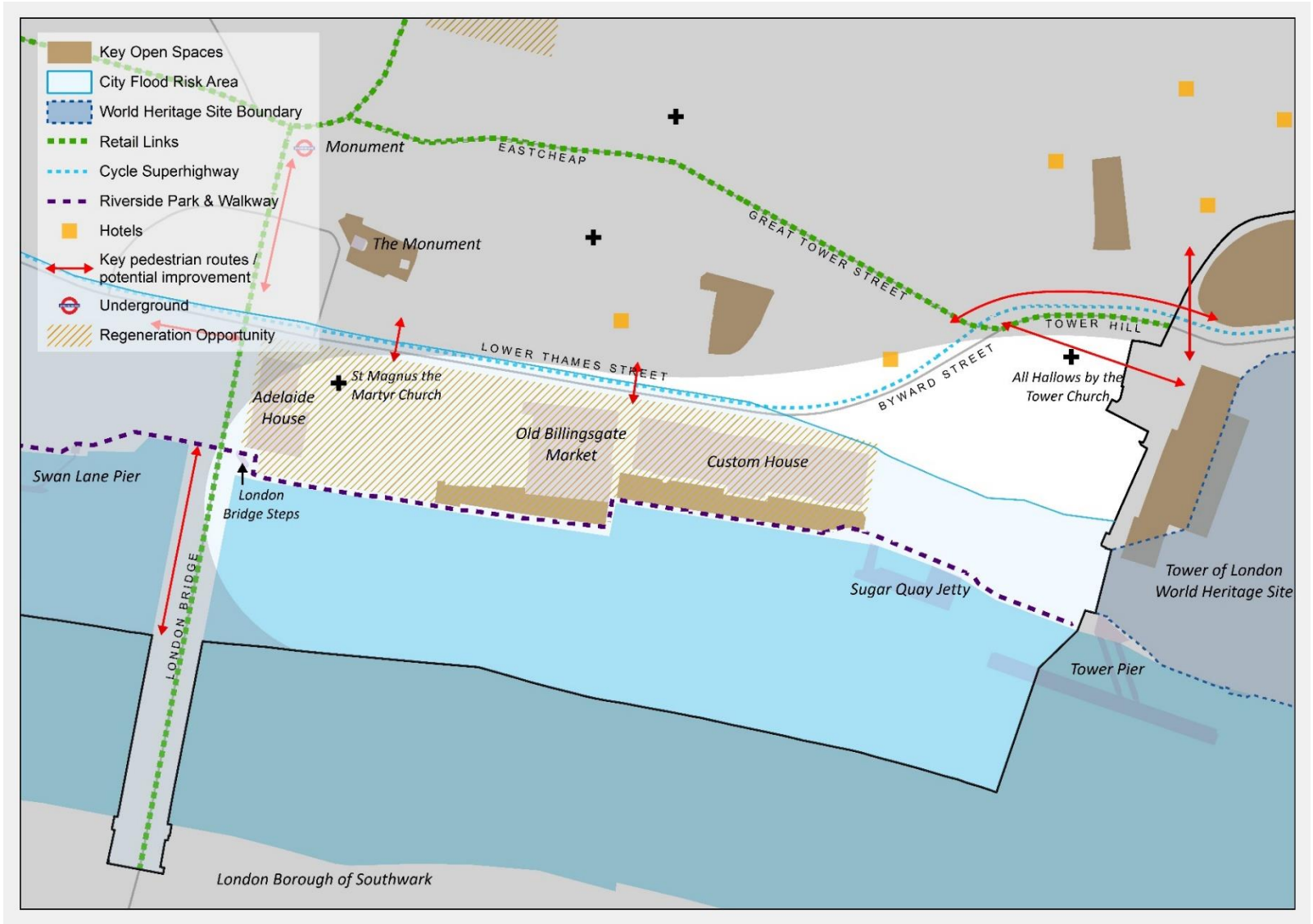


Figure 28: Pool of London Key Area of Change

7.4. Pool of London Key Area of Change

Context

- 7.4.1. The area is the heart of what was once a major port which now contains predominately office and commercial uses, with some residential and hotel use and small-scale retail adjacent to the Tower of London. There are no tube or train stations within the area but it is well served by public transport just outside the area, including London Bridge Station, Tower Hill and Monument Underground Stations, Tower Gateway DLR Station and the bus route along Eastcheap.
- 7.4.2. River passenger services operate from Tower Pier. Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is very poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge, however the public realm is tired and uninspiring and does not reflect the importance of this area. There is limited retail or ground floor vibrancy in this area.
- 7.4.3. The building stock is a mix of offices, and listed buildings, with modern residential and hotel development to the east. St Magnus the Martyr Church, All Hallows by the Tower Church and Custom House are Grade I listed, Adelaide House, Old Billingsgate Market and Custom House Quay, cranes and stairs are Grade II listed. Listed buildings and their key features should be enhanced. The eastern part of this area is within the local setting of the Tower of London World Heritage Site. The height of new buildings is limited by strategic and locally protected views.
- 7.4.4. A number of buildings are likely to be vacated in the short term, providing an opportunity for redevelopment, enhancement of heritage assets and/or refurbishment and public realm improvements. The aim is to achieve a City riverside which complements that on the Southbank of the Pool of London.
- 7.4.5. The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath Billingsgate Market and Billingsgate Bathhouse are Scheduled Ancient Monuments.

7.4.6. Strategic Policy S18: Pool of London

The Pool of London Key Area of Change will be regenerated through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:

1. Enabling office-led redevelopment or refurbishment of the existing building stock, including the provision of retail, cultural and leisure uses which are

complementary to, and do not detract from, the primary business function of the City.

2. Requiring and encouraging increased vibrancy and active frontages at ground floor level, through the provision of publicly accessible retail, leisure and cultural uses on the river frontage. New publicly accessible roof terraces and spaces will be required, where they offer good river views and do not impact adversely on the amenity of occupiers or nearby residents.
3. Encouraging the provision of cultural events, arts and play in public spaces along the riverside, where they enhance public areas.
4. Improving transport connections and pedestrian links by:

- improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
- improving signage to and from the Pool of London to the Tower of London;
- improving the servicing of buildings through the development of shared servicing bays and access points and collaborative management;
- restricting vehicular access to the riverside walk with the removal of private car parking areas upon redevelopment.

5. Enhancing public realm and public spaces by:

- enhancing the Riverside Walk to create a continuous riverside park and walkway free of cars between London Bridge and Tower Bridge and ensuring that pedestrian routes are accessible to all;
- identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and requiring greening of buildings on redevelopment;
- seeking additional public space and play facilities.

Reason for the policy

7.4.7. The Pool of London provides a visual gateway to the City of London from the Thames and to the historic port of London. A number of the existing buildings are likely to become vacant in the short term and this provides an opportunity to regenerate the area to provide a high-quality environment for businesses, visitors and residents.

7.4.8. The area is predominantly commercial in character and this will continue through encouragement of office-led commercial development. Existing post-war buildings could be redeveloped or refurbished to provide high quality office space or other commercial activities where these are compatible with the business City. Listed buildings and their key features should be enhanced. There is potential to provide interpretation of the historic development of the area, its relationship with the original site of London Bridge and the significance of the riverside. The priority should be for office use, but there is also potential

for complementary commercial and cultural uses compatible with the special interest of heritage assets and to encourage interpretation and public access to historic interiors.

7.4.9. Publicly accessible retail, cultural and leisure uses will be encouraged at ground floor level throughout the Pool of London to increase vibrancy and provide active frontages.

7.4.10. Redevelopment and refurbishment offer the opportunity to revisit existing servicing strategies which have been developed on a site by site basis. Developers will be encouraged to work with adjoining land owners to deliver shared servicing strategies and to minimise movements onto Lower Thames Street.

7.4.11. Despite its significance, the Pool of London is relatively isolated from the rest of the City by Lower Thames Street. Existing crossing points across Lower Thames Street will be improved and new crossing points created to encourage greater movement between the riverside and the rest of the City. Where possible, historic routes between the river and other areas of the City will be introduced or reinstated through the redevelopment and refurbishment of buildings.

7.4.12. The City Corporation will work with existing landowners and developers to design and deliver substantial improvements to the public realm along the riverside walk and routes to and along Lower Thames Street, working closely with Transport for London. Additional greening and open space will be encouraged, with tree planting in appropriate locations.

7.4.13. As well as delivering improvements in accessibility, vibrancy and public realm at street level, the City Corporation will encourage the provision of new, publicly accessible roof terraces and viewing areas through building redevelopment or refurbishment.

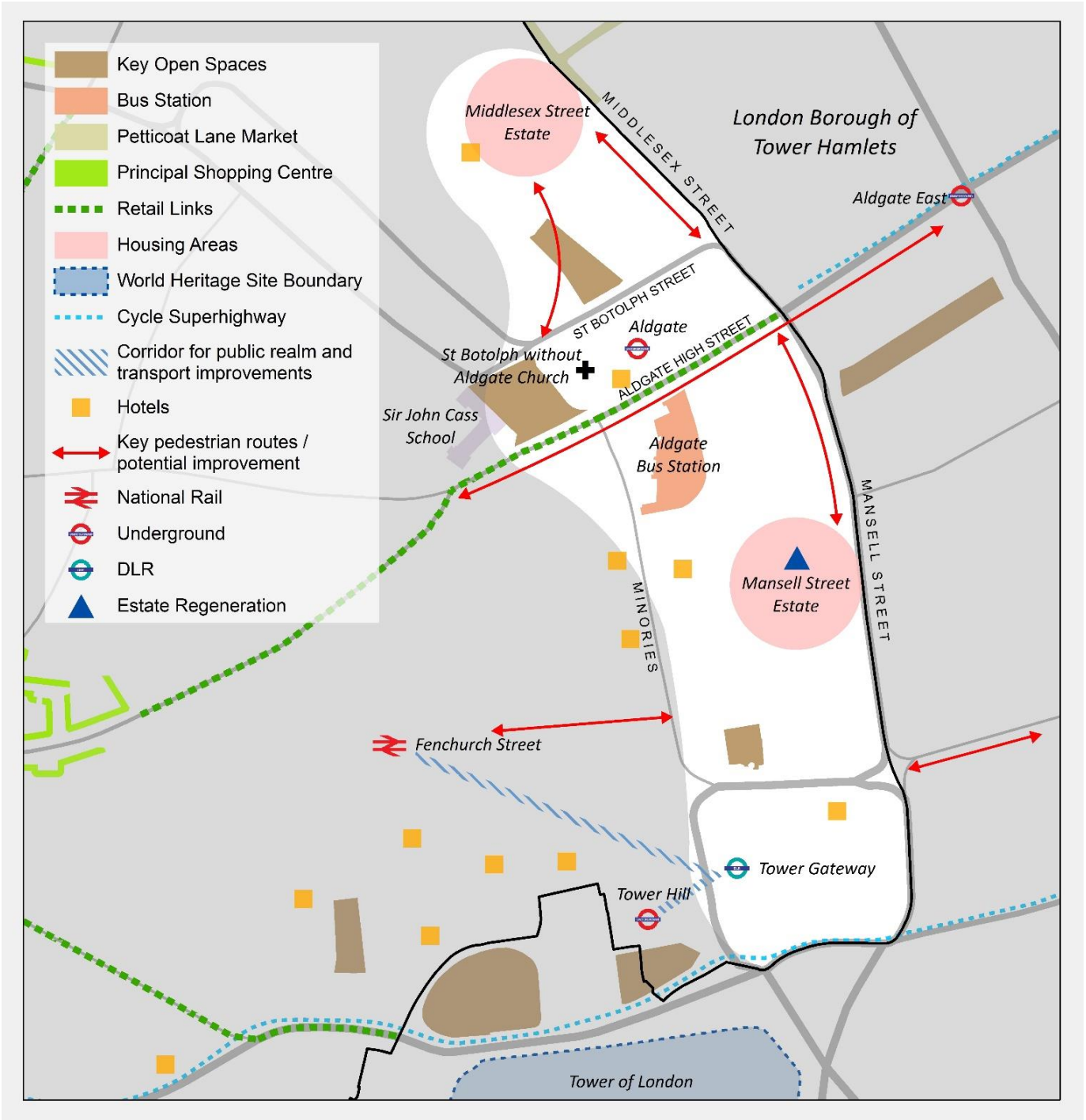


Figure 29: Aldgate & Tower Key Area of Change

7.5. Aldgate and Tower Key Area of Change

Context

- 7.5.1. The Aldgate and Tower area is positioned in the east of the City between the City's cluster of tall buildings and London's East End and includes Portsoken, Tower and Aldgate wards. The southern edge of the area is adjacent to the Tower of London.
- 7.5.2. The area contains a varied mix of uses, including offices, Sir John Cass Primary School, Mansell and Middlesex Street housing estates, part of Petticoat Lane market and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.
- 7.5.3. Major hotel and office development is under construction on Minories. There are proposals for redevelopment of the Mansell Street Estate and several large office sites currently have development potential. Petticoat Lane Market, a major tourist draw in the area, is undergoing public realm enhancement as well as being rebranded. These proposals and opportunities will impact on the use and environment of the area.
- 7.5.4. The Chinese Embassy will be moving to Royal Mint Court just outside of the City boundary and this may lead to further diplomatic and commercial interest in this area. The Elizabeth Line stations at Liverpool Street in the City and at Whitechapel in Tower Hamlets are both within walking distance of Aldgate; improved pedestrian connectivity should be encouraged to help enable development interest in the area.

Strategic Policy S19: Aldgate and Tower

The Aldgate and Tower Key Area of Change will be promoted as a mixed-use area, which balances the competing needs of residents, workers and visitors, by:

1. Promoting office-led commercial development to assist in the further regeneration of the area. Diplomatic use and associated commercial activity will be encouraged.
2. Identifying and meeting residents' needs, utilising a range of funding sources to:
 - maximise training, education and employment opportunities for residents;
 - maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;
 - create additional publicly accessible open space and additional accessible play space for children;
 - encourage local retail facilities;
 - facilitate the redevelopment of the Mansell Street Estate re-providing existing social housing and associated car parking, alongside additional residential units, improved levels of air and noise pollution, community facilities and good quality open and play spaces.

3. Recognising the benefit and managing the impact of visitors to the area by:

- encouraging cultural events, arts and play in public spaces, working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders to enhance Petticoat Lane Market and improve the visitor experience;
- permitting a limited amount of additional hotel provision on appropriate sites;
- managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.

4. Improving transport connections and pedestrian connectivity by:

- implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;
- improving Aldgate Bus Station to improve air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;
- sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;
- encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate;
- improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;
- enhancing links to the riverside walkway and the Tower of London;
- enhancing the north-south walking route between Tower Hill and Aldgate along Vine Street.

5. Enhancing the public realm and open spaces by identifying opportunities for urban greening schemes, congestion and pollution reduction measures, particularly in the vicinity of Sir John Cass School and Middlesex Street and Mansell Street Estates.

Reason for the policy

7.5.5. Until relatively recently, Aldgate was not as attractive for business investment as other parts of the City due to traffic levels, pollution and a lack of street-level activity. The City Corporation and its partners have sought to regenerate Aldgate by stimulating beneficial redevelopment and investing in a programme of environmental and public realm enhancements.

7.5.6. While there have been significant improvements, most notably the removal of the Aldgate gyratory and the creation of Aldgate Square the Aldgate and Tower area contains major through routes and parts of the area still suffer with associated congestion and poor air quality. The townscape around Tower Gateway is particularly affected by severance issues because of the road and rail networks, and there is currently little to entice visitors going to the Tower of

London to explore this part of the City more widely. Residents living on the Mansell and Middlesex Street Estates have lower levels of income, employment and education, skills and training than others in the City.

- 7.5.7. Identifying this area as a Key Area of Change will assist in guiding further enhancement of the area during the lifetime of this Plan. There is likely to be further commercial development, especially through the refurbishment or redevelopment of older buildings in the area. The redevelopment of the Mansell Street Estate is expected to be one of the largest residential schemes in the City during the Plan period and presents a challenge in terms of the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential environment at high densities and reducing residential exposure to air (and noise) pollution. The area will also experience increased tourism activity, in line with the continued increase in tourist numbers in London as a whole.
- 7.5.8. Development in the Aldgate and Tower area should enhance the appearance and vibrancy of the area and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities.
- 7.5.9. Policy S19 will be implemented through the determination of planning applications, the implementation of City Corporation strategies and projects, and working in partnership with a wide range of organisations.
- 7.5.10. Key partners include the London Borough of Tower Hamlets, which is working with the City Corporation to rejuvenate Petticoat Lane Market; TfL, which manages Aldgate Bus Station, Aldgate and Tower Hill Underground Stations and Tower Gateway DLR Station; The Aldgate Partnership, which represents businesses and other stakeholders and is seeking to establish a cross-boundary Business Improvement District (BID); and Historic Royal Palaces, which manages the Tower of London World Heritage Site.

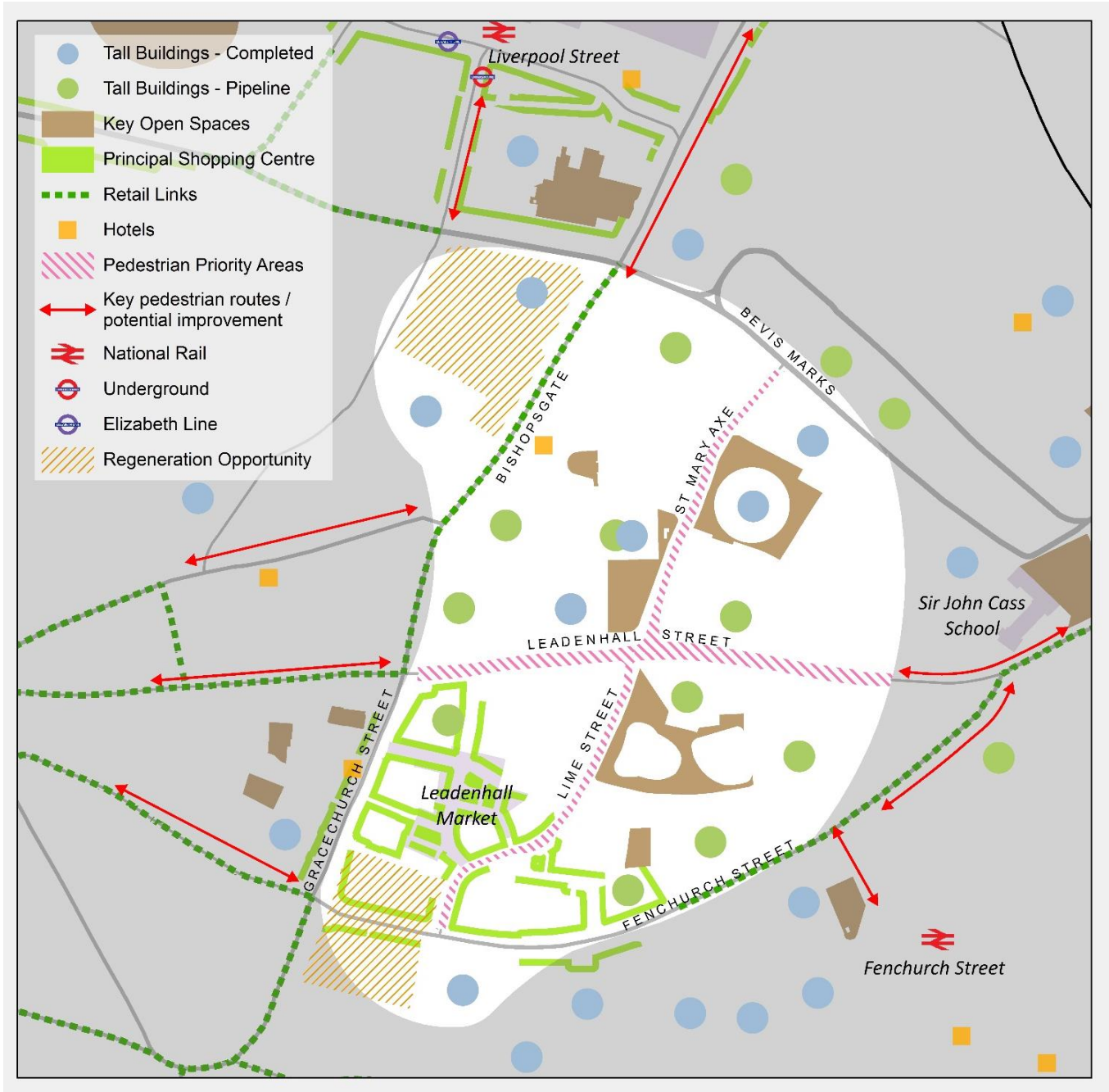


Figure 30: City Cluster Key Area of Change

7.6. City Cluster Key Area of Change

Context

- 7.6.1. The east of the City has the highest density of business activity in the City containing a cluster of tall buildings which form part of a distinctive skyline. It comprises an agglomeration of offices in banking and insurance use and increasingly a wider range of technology, legal and business services. Protected views considerations allow for the construction of tall buildings on appropriate sites in the Cluster area. Recognisable and iconic tall buildings, including the Gherkin and the Leadenhall Building have been constructed over the past 15 years and a number of significant tall buildings are under construction. There are further tall buildings that have been permitted but not yet commenced. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.
- 7.6.2. Projected employment growth will lead to a significant increase in footfall on streets that are already crowded at peak times. This concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation.
- 7.6.3. The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including Leadenhall Market which provides a key retail use in the heart of the Cluster and a valuable contrast to the modern development that surrounds it. The St Helen's Place Conservation Area contains the churchyards of St Helen and St Ethelburga, providing open space and respite for workers. The Cluster also forms the focus of the annual Sculpture in the City exhibition and attracts visitors to its contemporary and historic architecture.

Strategic Policy S20: City Cluster

The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements, by;

1. Increasing the provision of world class buildings that are sustainable and offer a range of office floorspace accommodation to cater for the needs of varied office occupiers.
2. Delivering tall buildings on appropriate sites, including Regeneration Opportunity sites. These should make a positive contribution to the City's skyline, conserving heritage assets and taking account of the effect on the wider London skyline and protected views.
3. Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations.

4. Enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and prioritising pedestrian movement during the daytime in key streets such as St Mary Axe, Leadenhall Street and Lime Street.
5. Ensuring the provision of high quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers.
6. Introducing new approaches to freight and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth.
7. Improving access to retail, leisure, cultural, health and educational facilities and services by encouraging a range of complementary land uses, ensuring active frontages at ground level and supporting activities such as 'Sculpture in the City'.

Reason for the policy

- 7.6.4. The City Cluster has been identified as the area within the City that is most suitable for tall buildings because of the opportunity sites and relative lack of constraints. The spatial extent of the Cluster has been informed by technical work undertaken to develop the City's 3D modelling, which shows that there is scope for further tall buildings, although not every site within the Cluster will be suitable. Market demand for new office space in this area has remained high and a large proportion of the office development pipeline is within the City Cluster. The resulting increase in floorspace and employment will inevitably put more pressure on public transport, streets, open spaces and services.
- 7.6.5. Office development within the City Cluster will be expected to deliver flexible floorspace to meet the needs of a range of occupiers and ensure the City's stock is resilient and ready to respond to changes in the market. While all forms of development should be of high quality design, tall buildings by their nature have an impact on the wider London skyline and it is important that they enhance the overall appearance of the Cluster on the skyline while also having a successful relationship with the space around them at ground level. The Regeneration Opportunity sites have potential to accommodate an uplift in floorspace in new tall buildings of an appropriate design and height. The City Corporation will use 3D modelling of the Cluster to better understand opportunities for redevelopment.
- 7.6.6. The intensification of tall buildings will have cumulative environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of public open space around the building, to ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.
- 7.6.7. The City Corporation is working with businesses and stakeholders to address the challenges facing the City Cluster. During the Plan period strategic

improvements to key streets and spaces will create a better connected and more rewarding pedestrian experience. Proposals include timed or permanent closures of certain streets to create a pedestrian priority core, wider pavements and improved crossings, which would enable consequential public realm improvements such as more greenery and space for cultural and seasonal events. The Eastern City Cluster Area Enhancement Strategy provides further details about these proposals, including an indication of potential design proposals.

7.6.8. Area-wide security measures will be implemented, including the Anti-Terrorism Traffic Regulation Order, to reduce the risks associated with high-profile buildings and increasingly crowded streets. Developers will be required to contribute towards the design and implementation of area-wide security through s106 planning obligations proportionate to the scale of the development. Area-wide approaches to servicing and deliveries will also be promoted, for instance the use of physical and/or virtual consolidation measures.

7.6.9. Active frontages and complementary land uses will be encouraged to enhance vibrancy and viability, extending to weekends to diversify the City, its economy and community.

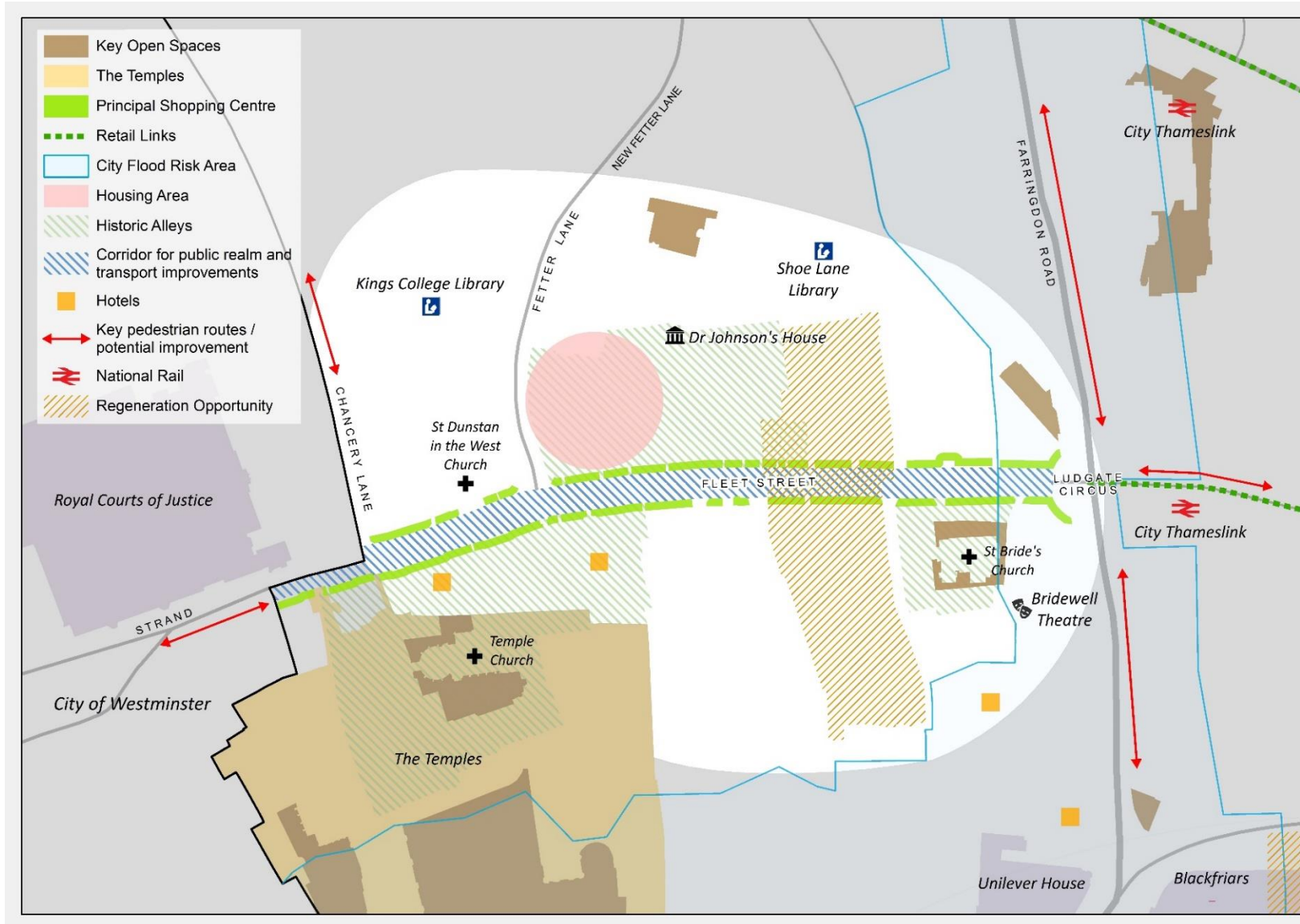


Figure 31: Fleet Street Key Area of Change

7.7. Fleet Street Key Area of Change

Context

7.7.1. The Fleet Street area is the former home of the press but has changed in character as the newspaper and publishing industries moved away. The western extent of the area comprises the legal precincts of the Inner and Middle Temples and adjoins the Royal Courts of Justice in the City of Westminster. Fleet Street is a Principal Shopping Centre (PSC) with retail frontage along its extent, although most units are small and cater principally for the lunchtime market. The street forms the spine of the Fleet Street Conservation Area and has numerous listed buildings. Protecting and enhancing this heritage will be a key consideration guiding future change. Fleet Street is part of the processional route through the City from Westminster and provides iconic views of St Paul's Cathedral. Fleet Street is heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.

7.7.2. Significant occupational change in major buildings is expected in the short to medium term as existing occupiers relocate to other buildings. There is an opportunity to promote regeneration of the area through appropriate development or refurbishment of key buildings providing links both north and south of Fleet Street to Holborn and the River Thames. The City Corporation, in partnership with the Ministry of Justice, is developing proposals for a new court building and police facilities in the area which will complement the legal cluster and stimulate further investment in this area.

Strategic Policy S21: Fleet Street

The character and function of the Fleet Street Key Area of Change as a centre for judicial and related business, a key processional route and a Principal Shopping Centre will be promoted by:

1. Development of new court facilities and City of London Police station, having regard to the impact of the development and associated security considerations on:

- The need to protect and enhance the Fleet Street Conservation Area and heritage assets;
- The need to retain retail provision within the Fleet Street Principal Shopping Centre;
- The need to ensure security of buildings for police and court use.

2. Continued protection of existing office use in the area, whilst encouraging the provision of flexible spaces and complementary uses in appropriate locations.

3. Directing further residential development to appropriate sites off principal streets to reinforce the existing residential cluster, ensuring a high quality of residential amenity.

4. Encouraging extension of retail activity within the Principal Shopping Centre into the evening and weekends, whilst retaining a focus on A1 uses.

5. Enhancing the public realm and open spaces by:

- Improving and increasing the capacity of pavements along Fleet Street;
- Enhancing the courts and alleyways that lead off Fleet Street and churchyards that are located in the area.
- Delivering additional greening on streets and open spaces and encouraging the greening of buildings, where this is compatible with heritage considerations.

Reason for the policy

7.7.3. Fleet Street is an iconic location with a name synonymous with the UK newspaper and publishing industry. However, the newspapers that occupied Fleet Street have moved out to be replaced with commercial office occupiers. The area is an established legal cluster in the City, focused on the Temples and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster.

7.7.4. The City Corporation in partnership with the Ministry of Justice has proposed a new flagship court facility for London to tackle cybercrime, fraud and economic crime. The proposed new court and police station will need to be consistent with the requirement to protect and enhance heritage assets in the Fleet Street area and the protection of retail uses within the Fleet Street PSC, whilst addressing the need for security and secure access.

7.7.5. The Fleet Street area has a strong cultural offer with attractions ranging from Dr Johnson's House to the St Bride's Institute, the Bridewell Theatre and the historic churches of St Brides and Temple Church. These attractions help draw visitors to the area, which support the PSC.

7.7.6. The Fleet Street area contains a mix of large modern office developments and smaller scale historic buildings more suitable for SME use. This commercial office focus will remain. Over the short to medium term, several major office occupiers are expected to relocate to other sites in the City. The City-wide presumption in favour of protecting office uses will continue to apply, but heritage and views constraints may limit opportunities for redevelopment of larger sites. Consequently, there may be potential for more flexible use of some buildings whilst retaining a predominance of commercial use, allowing uses which complement the City's business focus.

7.7.7. The area contains an existing residential cluster to the north of Fleet Street, with a number of upper floors of buildings on Fleet Street itself converted to residential in recent years. However, Fleet Street suffers from noise from commercial and retail activities, traffic and poor air quality. To ensure a high quality of residential amenity, new residential development in this area will be

directed to sites away from principal streets, where the potential for noise disturbance and exposure to poor air quality can be minimised.

7.7.8. The PSC is an important aspect of Fleet Street that provides vibrancy along its length. To strengthen the PSC, it should continue to focus on A1 uses, but also look to extend its retail offer into the evenings and weekends.

7.7.9. Fleet Street offers a poor public realm as it is heavily trafficked and has narrow footways that are congested particularly during peak hours and lunch times. There is limited greenery along Fleet Street. There is scope to enhance the public realm and achieve a better balance between motor vehicles and pedestrians. Improvements to the public realm will deliver benefits to the area as well as improve air quality and provide more quiet areas in the network of courts and alleyways behind Fleet Street. St Brides Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement.

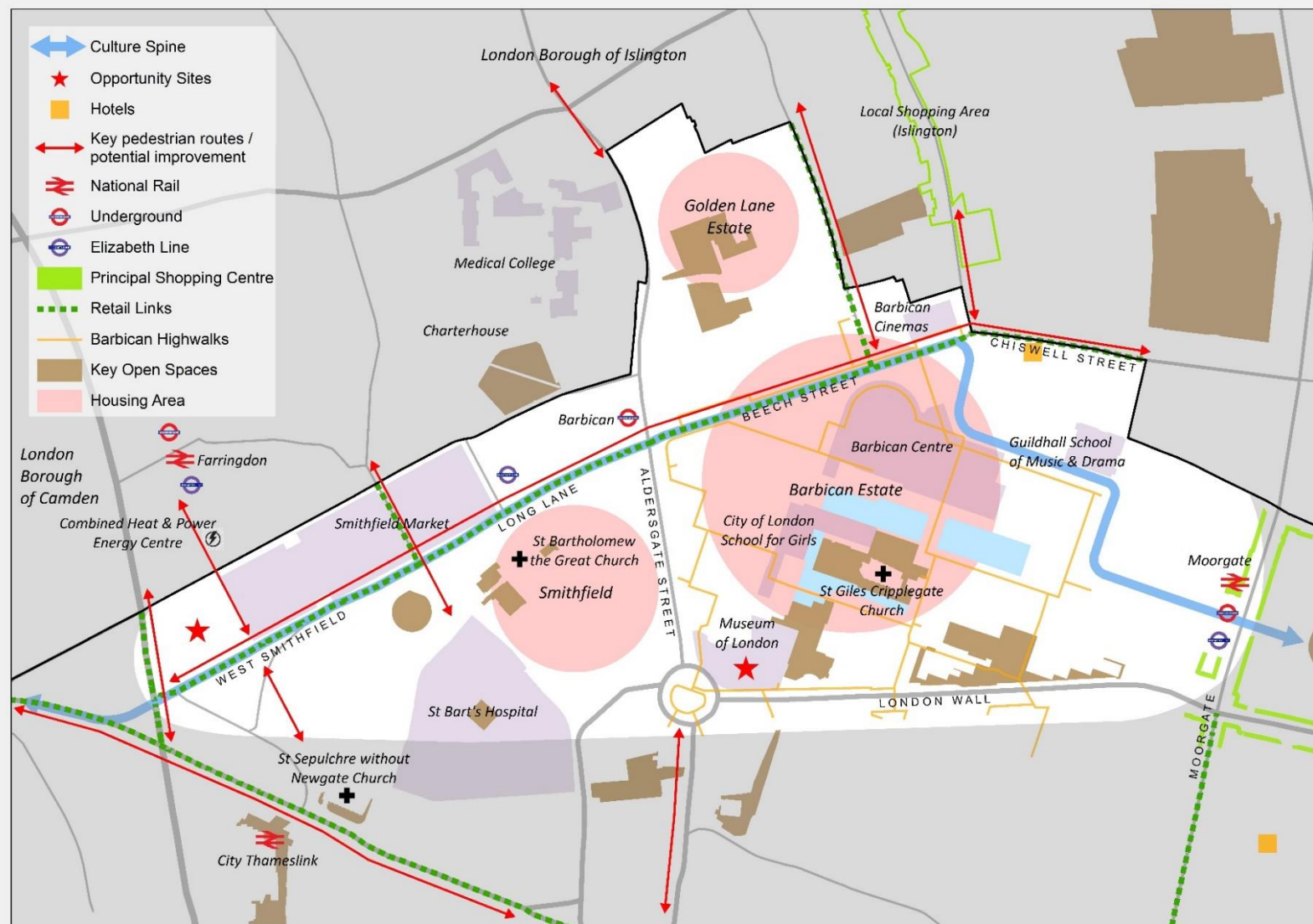


Figure 32: Smithfield and Barbican Key Area of Change

7.8. Smithfield and Barbican Key Area of Change

Context

7.8.1. The Smithfield and Barbican Key Area of Change is a vibrant area that contains:

- the highest concentration of residential units in the City, including in the Barbican and Golden Lane estates (39%) and Smithfield (principally Bart's Square);
- a cultural quarter, known as Culture Mile, focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic cultural area;
- St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre.
- Smithfield Market, a major London wholesale meat market.
- Many heritage assets including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, gardens and spaces.

7.8.2. This part of the City will undergo significant change and development over the life of the Local Plan with the delivery of the Culture Mile initiative, including relocation of the Museum of London to Smithfield and the potential development of a new Centre for Music on the site of the existing Museum of London (subject to further investigation). It is possible that Smithfield Meat Market will move from its current location in this period and alternative uses will need to be found for the historic market buildings.

7.8.3. In 2019, the Elizabeth Line will open, with a station entrance at Lindsey Street and another on Moorgate, significantly increasing public transport provision to the area and resulting in increased pedestrian flows to and from these stations, Culture Mile and the rest of the City.

Strategic Policy S22: Smithfield and Barbican Key Area of Change

The City Corporation will improve the Smithfield and Barbican area by:

- implementing the Culture Mile initiative, including delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy.
- ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst preserving privacy, security and noise abatement for residents and businesses;

- identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;
- improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;
- seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;
- requiring improvements to pedestrian and cycle routes, including for disabled people, within and through the north of the City.
- supporting continued connections to the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.

Reason for the policy

7.8.4. The Smithfield and Barbican area contains a very diverse range of uses, including commercial offices, retail, market, cultural, hospital and residential, which attract large numbers of people to the area. During the life of this Plan, relocation of the Museum of London from its current site on London Wall to Smithfield, potential development of a Centre for Music on the Museum of London's current site, possible relocation of Smithfield Market and implementation of a range of cultural and artistic activities and buildings through Culture Mile, will see a substantial increase in visitor numbers to this part of the City and enhance the area's attractiveness for businesses, residents and visitors. The opening of the Elizabeth Line in 2019, linking to national rail and tube lines, will make this area one of the most accessible locations by public transport in the country, again resulting in increased pedestrian flows.

7.8.5. This policy will enable the maintenance and improvement of the public realm, improved amenity, design and movement, for the benefit of workers, residents and visitors, to maintain a pleasant environment and manage the large volumes of people and activities. Due to the high level of residential use in this area and the hospital, improving air quality is important to protect the health of the residents and patients.

Culture Mile

7.8.6. Culture Mile is a unique collection of arts, cultural and educational organisations in the north of the City which has been created through a partnership of the City of London Corporation, the Barbican Arts Centre, Guildhall School of Music and Drama, the London Symphony Orchestra and the Museum of London. Culture Mile is centred on the Barbican and runs from Farringdon to Moorgate on the east-west axis and from St. Luke's London Symphony Orchestra Centre to St. Paul's Cathedral on its north-south axis. The Barbican area has been identified as a Strategic Cultural Area in the London Plan.

Strategic Policy S23: Culture Mile Implementation

The City Corporation will promote and protect Culture Mile as the City's main cultural centre and world class cultural destination, by encouraging and supporting:

- the relocation of the Museum of London to Smithfield;
- the potential development of a new Centre for Music on the current site of the Museum of London on London Wall;
- shared working with the London Borough of Islington to ensure the change and development around Culture Mile benefits local communities through improved access to cultural enrichment, education, skills and employment opportunities;
- provision of cultural facilities and uses within buildings and the public realm, where appropriate, and where the amenity of surrounding uses is not significantly compromised;
- supporting the provision of additional retail, hotel and leisure uses in appropriate locations, particularly along the Culture Spine key route:
- encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries;
- strengthening of routes, way finding, lighting and signage throughout the area and the links with the rest of the City in a co-ordinated manner;
- public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile and which provide a specific identity for Culture Mile.

Reason for the policy

7.8.7. Culture Mile has been identified to guide cultural and creative activity within this part of the City, including potential development in the area during the life of the Plan. It will build on and promote the wealth of the City's cultural attractions to a wider audience. The opening of Elizabeth Line stations will contribute to the development of the area.

7.8.8. An important element of the emerging proposals for Culture Mile is the identification of movement spines, including a key route from the proposed Museum of London site, along Long Lane and Beech Street. Significant improvements to the public realm and traffic reduction measures, particularly along Beech Street, will be progressed to support increased pedestrian flows and the provision of cultural activity on street. Public realm improvements will be sought as development opportunities arise.

7.8.9. To deliver its ambitions for Culture Mile, the City Corporation is aiming to create a distinctive look and feel to unify the area, which allows for the provision of art installations and activity in the public realm.

7.8.10. The City Corporation and partners have commissioned research to consider the contribution made by creative industries in and around Culture Mile to the City's economy and the potential for growth of this sector as part of the Culture Mile initiative.

Policy SB1: Culture Mile Impacts

The City Corporation will protect the amenity of residents and occupiers, the integrity of historic and listed buildings and structures and the flow of traffic and access to premises for service vehicles affected by Culture Mile:

- considering the impact of noise-generating uses, particularly night-time activities on residents and business occupiers when granting planning permissions;
- requiring the installation of noise mitigation measures in developments and spaces to minimise disruption where appropriate;
- requiring development and cultural activities to preserve and enhance the existing historic integrity of historic buildings, structures and spaces. and conservation areas;
- allowing suitable architectural lighting of buildings and spaces, consistent with their heritage status, the amenity of occupiers and the requirements of Culture Mile;
- ensuring public realm and open space improvements, and temporary and pop-up stalls and events do not impede the efficient flow of people and essential vehicles.

Reason for the policy

7.8.11. Culture Mile will be a vibrant place with large numbers of people and significant activity during the day and night. This level of activity will impact on residents and workers as well as the movement of people and traffic and therefore mitigation measures need to be considered alongside project implementation.

Smithfield

7.8.12. The Smithfield area has over centuries developed a distinctive mixed-use character and townscape and contains the designated Smithfield Conservation Area. It is characterised by the wholesale Smithfield Meat Market, the General Market and St Bartholomew's Hospital complex. The hospital is a leading internationally renowned teaching hospital and centre for excellence which includes specialist cardiac and heart centres. The Smithfield area also supports a range of other land uses, including residential, offices, retail, leisure and night-time entertainment. The Smithfield Market buildings are an important historic asset that will be enhanced by the Museum of London moving into the General Market building in Farringdon Street. There is also a possibility that Smithfield Meat Market will relocate to a consolidated wholesale market site along with Billingsgate and New Spitalfields Markets during the Plan period.

7.8.13.

Strategic Policy S24: Smithfield

The City Corporation will protect and enhance the distinctive mixed-use and historic character of Smithfield by:

- supporting the continued presence of St. Bartholomew's Hospital;
- supporting the continued presence of Smithfield Meat Market in the short to medium term and ensuring that any future re-use of the market buildings maintains and enhances their heritage value;
- further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses;
- recognising the particular challenges which will result from the 24-hour, 7 day a week character of the area;
- ensuring new activities and developments do not adversely affect traffic movement, the operation of businesses and amenity of residents.
- Providing for, and supporting, improved pedestrian permeability and public realm enhancements across the area to accommodate increased pedestrian flows arising from the Elizabeth Line and the Museum of London relocation.

Reason for the policy

7.8.14. The relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line in 2019 and development of Culture Mile activities, will result in a significant increase in pedestrian and visitor numbers which will place further pressure on the public realm. Improvements to the public realm will be required to ensure that increased movement can be accommodated. At the same time, it is important that new activities do not adversely affect the amenity of existing business and residents, the continued operation of St Bartholomew's Hospital or impact on the area's historic and mixed-use character.

7.8.15. The City Corporation has carried out a strategic review of its 3 wholesale markets, Smithfield, Billingsgate and New Spitalfields. A decision has been taken in principle, subject to feasibility and consultation, to consolidate the wholesale markets onto a single site. Consultants were appointed in July 2018 to manage the process of identifying a suitable site. As a result, it is possible that Smithfield Meat Market will move from its current location at some time in the latter part of the Plan period. The Local Plan therefore continues to protect the existing location and operation of the Market in its current location, but also make provision for possible future movement of the Market and provide guidance on future potential uses of the market buildings which enhance their historic interest.

7.8.16. The existing public car park at Smithfield Rotunda is likely to become a more intensively used facility in future having regard to the Culture Mile proposals and the anticipated increase in complementary retail and leisure uses.

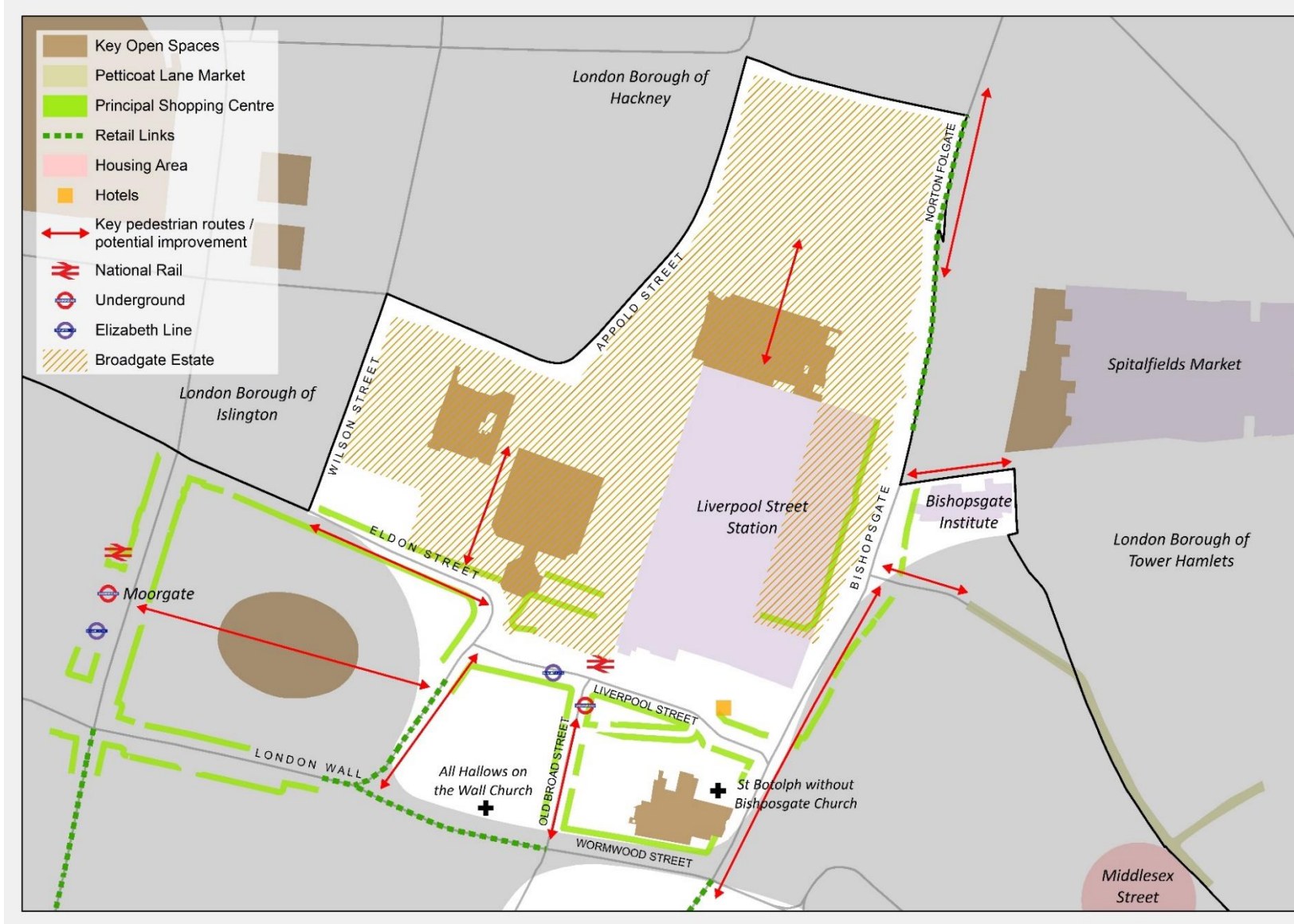


Figure 33: Liverpool Street Key Area of Change

7.9. Liverpool Street Key Area of Change

Context

7.9.1. The Liverpool Street area stretches from the City border with Shoreditch to the north east, to the Barbican and Culture Mile to the west and the City Cluster to the south. It is an area that will experience extensive change with the opening of the Elizabeth Line in 2019 and the completion of significant new office floorspace and retail and leisure facilities which are currently under construction or progressing through the planning process.

7.9.2. Liverpool Street is the gateway to the City for the East Anglia – as well as being a multi-line tube station. The Elizabeth Line will provide fast, easy access from the west including the West End, Heathrow and beyond, linked to Moorgate station which already serves stations to the north of London. The increase in passengers and pedestrians in this area facilitated by the Elizabeth Line brings challenges and opportunities: challenges in terms of additional people on already heavily used streets; opportunities in terms of increased accessibility for businesses and greater demand for the growing retail and leisure sector.

7.9.3. The area provides as a gateway to ‘Tech City’ focussed on Old Street, Shoreditch and Spitalfields, and there are further opportunities to develop tech-related activity in the City and its fringes. Facilitating office space suitable for such businesses - affordable, collaborative, and available for short periods of time – will enhance the local business eco-system and strengthen the City’s reputation as a centre for start-ups and the tech industry. Links could be further developed between the creativity of the Culture Mile and Tech City, enhancing the creative eco-system.

Strategic Policy S25: Liverpool Street

The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by the opening of the Elizabeth Line and the redevelopment of the Broadgate Estate by:

- Accommodating the increased footfall by enhancing walking routes, improving wayfinding and by maintaining and enhancing links to the Highwalk network.
- Providing active frontages and clear signposting that reflects the area’s position as a gateway to the Culture Mile.
- Encouraging the development of flexible and collaborative office space to meet the needs of potential start-ups, businesses growth and the development of the tech eco-system. Collaboration between creative industries in Culture Mile and emerging tech industries will be promoted.
- Facilitating linkages between business, the creative sector and educational institutions.

- Supporting additional retail provision in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends, while managing the potential impacts associated with the night-time economy.
- Enhancing the environment of, and routes to, Petticoat Lane Market and links to Whitecross Street and Spitalfields markets.
- Improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including Culture Mile and the City Cluster.

Reason for the policy

7.9.4. The Liverpool Street area is undergoing significant transformation through redevelopment and refurbishment of the Broadgate Estate and surrounding streets, the opening of the Elizabeth Line in 2019, and significant intensification in the City Cluster to the south. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, thereby enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. The Broadgate Estate is currently developing a more 'outward looking' character and this is expected to continue, alongside further improvements to permeability.

7.9.5. Where suitable funding is available, the City Corporation will support such change through public realm and improvement to streets and pedestrian routes. The draft Transport Strategy indicates that the area around Moorgate and Liverpool Street stations will be prioritised for improvements, together with the routes between these stations and key destinations such as Culture Mile and the City Cluster.

7.9.6. Alongside these changes, encouragement will be given to the provision of space suitable for start-ups, technology-based companies and creative industries, including the provision of flexible accommodation suitable for these sectors and growing businesses. This will reinforce established links between the area and the Old Street/Shoreditch/Spitalfields 'Tech City' and will exploit the opportunities presented by Culture Mile to enhance the creative ecology of this part of the City.

8. Implementation

8.1. Planning Contributions

Context

8.1.1. Community Infrastructure Levy (CIL)

8.1.2. The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) set out the legislative and regulatory basis for the CIL. They provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the Local Plan. CIL is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

Planning Obligations

8.1.3. CIL Regulations indicate that planning obligations may only constitute a reason for granting permission if the planning obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

8.1.4. Planning obligations are legal agreements linked to planning permissions that regulate the way a development is undertaken, and they are used where it is not possible to regulate the permission by means of a condition. They may be in the form of in kind benefits or a financial contribution and may be used to prescribe the nature of a development, compensate for loss or damage created by a development, or mitigate the impacts associated with the development. The level of any obligation is subject to consideration of its impact on the viability of the development proposed.

Strategic Policy S26: Planning Contributions

The City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development:

1. Requiring contributions through the Community Infrastructure Levy to assist in the delivery of the infrastructure necessary to support implementation of the Local Plan and the City's Transport Strategy.
2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:

- site specific mitigation meeting statutory tests;
- affordable housing;
- training, skills and job brokerage;
- carbon offsetting;
- local procurement in the City and neighbouring boroughs.

3. Requiring qualifying development to make an additional contribution to meeting the costs of Crossrail or other strategic infrastructure in accordance with the provisions of the London Plan.

4. Use of the Vacant Building Credit is not considered to be appropriate in the City of London

Reason for the policy

8.1.5. The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL) to help local infrastructure keep pace with the demands of development and attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to ensure proposals are acceptable.

How the policy works

8.1.6. The City Corporation has adopted a CIL Charging Schedule and a Regulation 123 List which sets out the types of infrastructure or infrastructure projects that may be funded in part or in whole by CIL.

8.1.7. In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security measures in the City Cluster, in line with the policies set out in this Plan. Planning obligations will also be negotiated to deliver affordable housing, the provision of training and skills programmes and carbon offsetting. Specific requirements are set out in other policies within this Plan, particularly Policies S1, S3 and D1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

8.1.8. Where required, the City Corporation will also seek, via s106 planning obligations, to negotiate Section 278 Agreements with developers to ensure that

highway works necessary to make a development acceptable in principle are funded by the developer and implemented by the highway authority.

8.1.9. Further detail on required planning obligations is set out in the Planning Obligations Supplementary Planning Document and in the s106 Standard Template which is published on the City Corporation's website.

8.1.10. The Vacant Building Credit is set out in national planning policy and is intended to provide an incentive to bring forward brownfield sites for development. The high cost of land in the City of London, together with high levels of demand for commercial and residential development, mean that additional incentives are not required to encourage brownfield sites to come forward for development. The use of Vacant Building Credit is therefore not considered to be appropriate within the City of London.

Crossrail

8.1.11. The London Plan requires development to make a financial contribution towards the construction cost of Crossrail, through both s106 planning obligations and the Mayoral CIL. Planning obligations contributions will be required from office, hotel and retail development and CIL contributions from all qualifying development in the City.

8.1.12. The Mayor has proposed that the Crossrail CIL and s106 contributions will be replaced by a new Mayoral Community Infrastructure Levy 2, which will contribute towards the cost of delivering the Crossrail 2 railway, or other strategic infrastructure if Crossrail 2 does not progress. If agreed, this new MCIL2 will apply a standard CIL rate across the City for all qualifying development, with higher rates of CIL due for office, hotel and retail development in the City.

Policy PC1: Viability Appraisals

1. Development proposals must take full account of the policy requirements set out in this Plan and the London Plan, including financial and other requirements under the Mayoral and City of London Community Infrastructure Levy and s106 planning obligations.
2. Exceptionally, even where policy requirements have been fully taken into account, applicants may consider that these requirements cannot be delivered in full without adversely affecting the overall viability of a development. Proposals which are not compliant with policy requirements will normally be refused. However, where applicants wish to make a case that non-compliant proposals should be permitted, this must be supported by a scheme specific viability assessment.
3. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a site and/or building will not be a relevant justification for not meeting Development Plan requirements.

4. Viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. If an assessment is redacted, an executive summary will be made public.
5. The City Corporation will seek independent verification of submitted viability appraisals, with the cost of verification being met by the applicant.
6. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.

Reason for the policy

8.1.13. Delivery of the Local Plan and the London Plan requires developers to make contributions towards infrastructure and affordable housing provision through the CIL and s106 planning obligations. Developers must take into account the full cost of meeting development plan requirements when purchasing sites or buildings and in the design of schemes. Exceptionally, there may be circumstances where a developer considers that meeting development plan requirements in full cannot be delivered without adversely impacting on the viability of a development. In such circumstances, the City Corporation will require a viability appraisal to be submitted in support of the proposed lower level of contributions.

How the policy works

8.1.14. Where viability appraisals are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability appraisals set out in national Planning Practice Guidance. In particular, appraisals must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the Local Plan and the London Plan. The actual price paid for land will not be a relevant justification for failing to meet the policies in the development plan.

8.1.15. The City Corporation will assess viability appraisals against the requirements in the Local Plan and London Plan and, where necessary, will seek independent verification of submitted appraisals from suitably qualified consultants who have experience of the development market in central London. Assessment of viability appraisals will consider whether appropriate costs and values have been utilised which reflect the ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.

8.1.16. The City Corporation will make all viability appraisals submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability appraisal should remain confidential in whole or in part, they should provide justification to the

City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability appraisal public. Where the City Corporation considers that an appraisal should remain confidential in whole, or in part, it will keep the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.

- 8.1.17. Where the City Corporation agrees that a development cannot meet the full policy requirements for CIL and s106 planning obligations at the date of commencement, but that there are other policy considerations which would nevertheless justify approval of the scheme despite this non-compliance, the Corporation will normally require that a review mechanism be included within any s106 planning obligation, with a review of the viability information required at a later stage in the development, or upon occupation. In determining the appropriate mechanism, the City Corporation will have regard to national Planning Practice Guidance and the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance. Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.
- 8.1.18. Policy S3 Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.

Appendices and Glossary

Appendix 1 - Technical note on applying the Urban Greening Factor

The diagram and table show a theoretical square development site (100sq.m) showing how it would be analysed in terms of surface cover and areas of each type.



Figure 1: Diagram of simplified theoretical development site

To calculate a UGF score for any proposed development it is necessary to **measure the overall area of the site and then to map and measure the coverage of various surface types** within the site. Scores are then assigned to each surface cover and a calculation of the overall green space factor can begin. The score for each surface cover within a site is multiplied by its area. The formula is shown below.

$$\frac{(\text{Score A} \times \text{Area}) + (\text{Score B} \times \text{Area}) + (\text{Score C} \times \text{Area}) + (\text{Score D} \times \text{Area}) \text{ etc.}}{\text{Total Site Area}}$$

The relevant scores for each type of surface cover in the City of London is set out in the table at Figure 2. Minor adjustments have been made from the original GLA scoring system to encourage certain categories of greening which will deliver

significant benefits in the City, particularly tree planting, good quality green roofs (of adequate soil depth) and green walls.

Surface Cover Type	GLA	CoL
Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site	1	1
Wetland or open water (semi-natural; not chlorinated) created on site	1	1
Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – See livingroofs.org for descriptions. ⁶⁸	0.8	0.9
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two-thirds of the projected canopy area of the mature tree -see Trees in Hard Landscapes for overview. ⁶⁹	0.8	0.9
Extensive green roof with substrate of minimum settled depth 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014. ⁷⁰	0.7	0.8
Flower-rich perennial planting – see Centre for Designed Ecology. ⁷¹	0.7	0.7
Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case studies. ⁷²	0.7	0.7
Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance ⁷³	0.6	0.6
Standard trees planted in pits with soil volumes less than two thirds less than the projected canopy area of the mature tree.	0.6	0.7
Green wall – modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview. ⁷⁴	0.6	0.7
Groundcover planting – see RHS Groundcover Plants for overview ⁷⁵	0.5	0.5
Amenity grassland (species-poor, regularly mown lawns)	0.4	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014. ⁷⁶	0.3	0.3
Open water (chlorinated) or unplanted detention basins	0.2	0.2
Permeable paving - see CIRIA for overview ⁷⁷	0.1	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0	0

Figure 2: Proposed City of London UGF Scores compared with GLA scores in draft London Plan (See Table 9 in Urban Greening Factor Study Report)

Glossary

(to be added)

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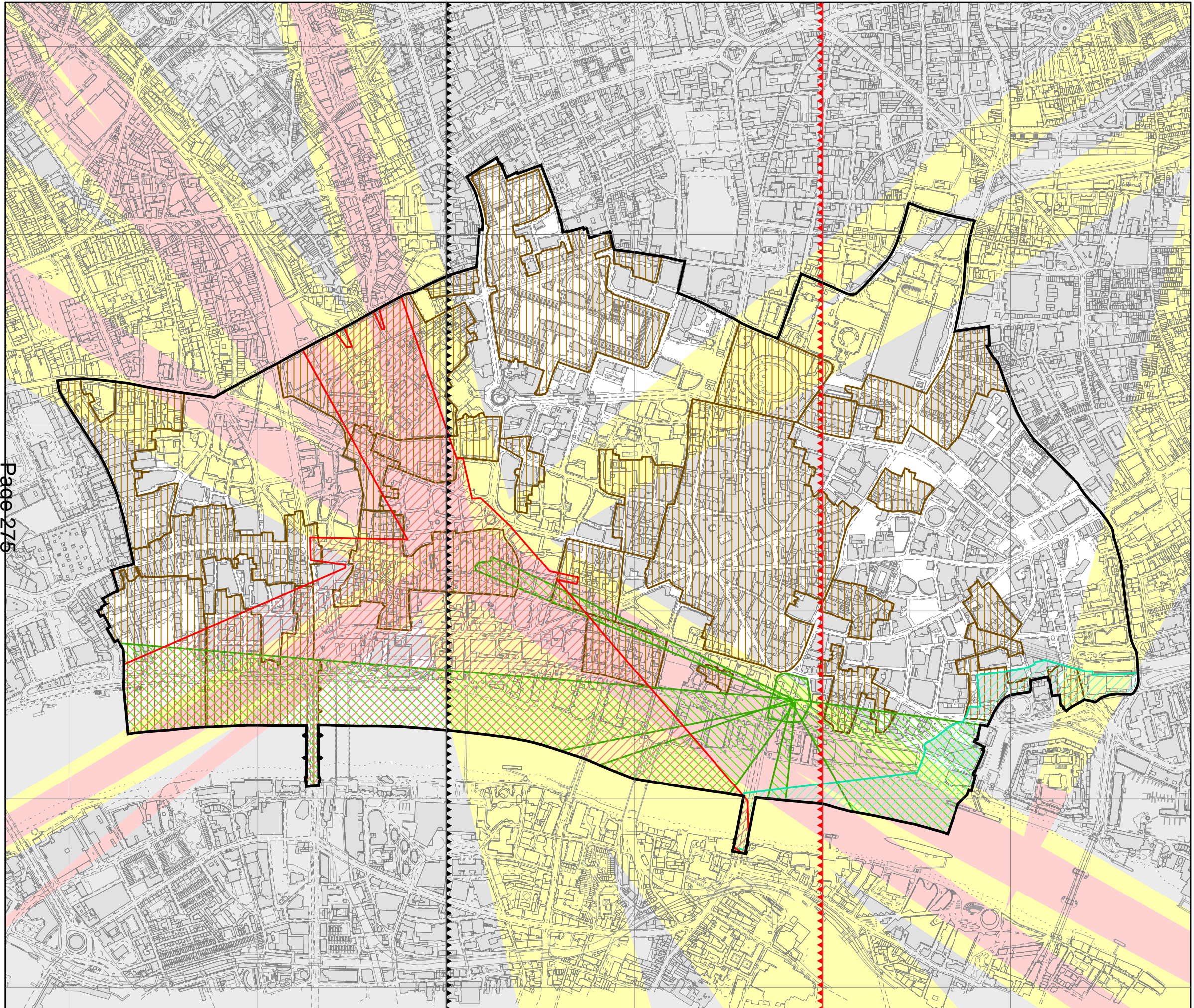
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CITY OF LONDON
DRAFT LOCAL PLAN
POLICIES MAP A
 October 2018

KEY

Administrative Boundary of the City of London

Historic Environment Policy No.

Conservation Areas S11 & S12 HE1

Tower of London World Heritage Site - Local Setting Area S11 & S13 HE3

Tall Buildings and Protected Views

London View Management Framework - Protected Vista Landmark Viewing Corridors S12 & S13

London View Management Framework - Protected Vista Wider Setting Consultation Areas S12 & S13

St Paul's Heights Policy Area S12 & S13

Monument Views and Setting CS 13 & 14

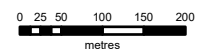
London City Airport Safeguarding Area S12

London Heathrow Airport Safeguarding Area S12

This Policies Map is one of two covering the City of London. See also Policies Map B.



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CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT
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 Director of the Built Environment

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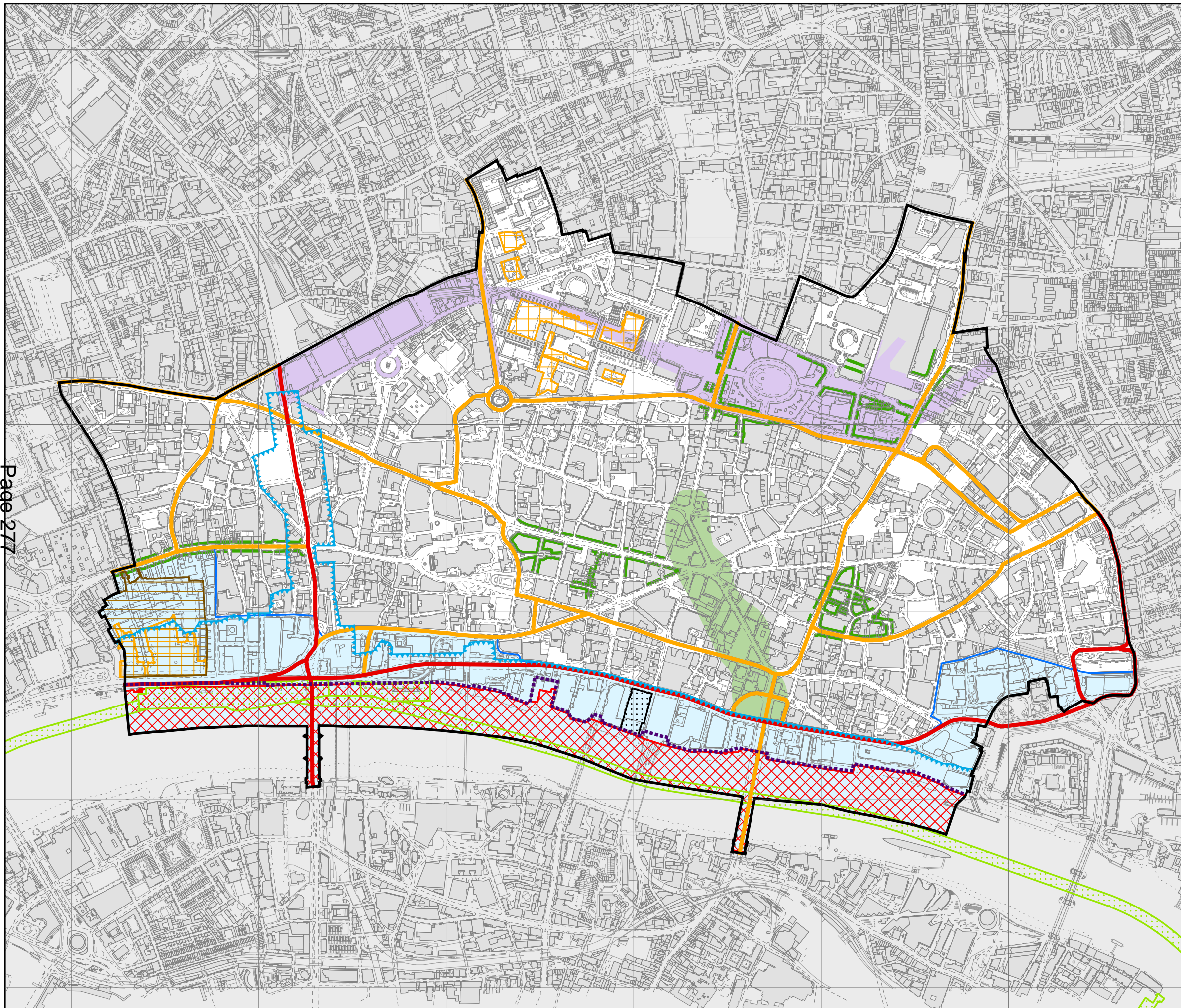
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CITY OF LONDON
DRAFT LOCAL PLAN
POLICIES MAP B
 October 2018

KEY

Administrative Boundary of the City of London

Key Areas of Change Policy No.

Thames Policy Area S16

Thames Tideway Tunnel Safeguarding Area S16

Riverside Walk CS 9

Vehicle Transport and Servicing

Crossrail Safeguarding Area S9

Bank Station / Northern Line Upgrade Safeguarding Area S9

London Access S9

City Access S9

Open Spaces and Green Infrastructure

Site of Metropolitan Importance for Nature Conservation OS3

Site of Borough Importance for Nature Conservation OS3

Climate Resilience and Flood Risk

City Flood Risk Area S14 CR2

Circular Economy and Waste

Safeguarded Wharf S15 & S16 VT4

Retail

Principal Shopping Centre S5 R1

Housing

The Temples H7

This Policies Map is one of two covering the City of London. See also Policies Map A.



SCALE 1:10000



CITY OF LONDON

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Integrated Impact Assessment – draft City Plan 2036

Non-Technical Summary

IIA Scope

The Integrated Impact Assessment for the City incorporates: Sustainability Appraisal (SA), Health Impact Assessment screening (HIA) and Equalities Impact Assessment screening (EqIA). The assessment covers the requirements for Strategic Environmental Assessment seeking to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation. This non-technical summary outlines the information required in environmental reports (Schedule 2 Environmental Assessment of Plans and Programmes Regulations 2004)

1) The City Plan 2036 and its relationship with other plans and programmes

The City Plan 2036 will replace the adopted Local Plan 2015 as the primary policy document for Planning in London's central business district. It will guide development in the City through planning policies, contributing to the overall objectives of a flourishing society, thriving economy and outstanding environments. As the plan for spatial development in the City it must take account of a wide range of other plans and programmes at international, national, regional and local level. These other plans and programmes include environmental targets which the City Plan 2036 must contribute to realising.

2) Current state of the Environment

Economy – As a globally important business district the City's predominant land use is offices. The area contributes to local, regional, national and international prosperity and relies on wider transport, utility and housing infrastructure to ensure its success. The City's workforce is predicted to grow by approximately 100,000 during the period of the plan. Without a plan the City would be unable to provide suitable office space to accommodate this increased workforce taking account of new styles of working and accompanying infrastructure requirements.

Environment – Covering one square mile, the City has numerous pockets of open space and is bounded to the south by the River Thames site of metropolitan importance for nature conservation. In common with the rest of central London it has poor air quality, is a major contributor to carbon emissions and generates significant quantities of waste which must be transported elsewhere for treatment. Without a plan the pressure for development to accommodate additional workers could result in encroachment into the City's valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Lack of planning for transport, waste and air quality would result in degradation of the environment within and beyond the City. Planning for altered weather patterns as a result of climate change will become increasingly important during the plan period.

Social – The City has a low resident population with around 8,000 people living in the City and a high proportion of second homes. Over 480,000 people work in the City many of whom commute daily from a wide area to access workplaces, although working patterns are changing. The resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with living in a business district. The health and wellbeing of the City’s workers and residents could be compromised if insufficient recreation, relaxation and health facilities were developed. Without changes to the adopted Local Plan the City’s aspiration to develop Culture Mile around the Barbican Centre would be less likely to progress.

3) Environmental characteristics of areas likely to be affected

As a high-density urban environment the City and surrounding areas suffer from poor air quality, urban heat island effect, noise and have a high potential for land and water pollution as a result of contaminated water run-off. Wider initiatives on air and water quality such as the London Ultra Low Emission Zone and the Thames Tideway Tunnel will improve some aspects but the City’s Local Plan is an essential element in implementation of these initiatives within the City.

4) Designated Areas

There are no designated European sites within the City of London boundary but there are two which lie wholly or partly within a 10km buffer area:

- Epping Forest SAC
- Lea Valley SPA and Ramsar site

A separate Habitats Regulation Assessment Screening has been carried out which concludes that *“the City of London Draft Local Plan ‘City Plan 2036’ is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA”*.

5) Environmental protection objectives

The IIA framework includes a review of other plans and programmes, identification of sustainability issues and problems, assessment of policy options and draft policies against a series of social, environmental and economic IIA objectives which include health and equalities objectives. Detailed objectives and criteria (para 3.5) were subject to consultation at scoping stage and were used to assess the impacts of the draft plan.

6) Significant Effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City’s IIA objectives showed general agreement between the IIA aspirations and the objectives of the plan. This

assessment assisted in strengthening the City Plan 2036 objectives, further promoting sustainability through the Outstanding Environments objective and heritage protection through the Key City Places objective.

The assessment of the draft City Plan policies against the IIA objectives demonstrates that the impact of the plan will be largely positive as summarised below.

Parameter	Effect of draft City Plan 2036
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna.
Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health
Soil, Water and Air	Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement.
Climatic factors	Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City's carbon emissions. Flood Risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate
Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2036 policies including safe and secure City, visitors arts and culture, open spaces and are reinforced by policies which address the City's Key Areas of Change
Cultural heritage and Landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from distant viewing points

7) Mitigation measures

A number of uncertainties were identified and assessment tables (Appendix 5) recommend mitigation that could be used to deal with these uncertainties. For example:

Flourishing Society

- Inclusiveness in play facilities and areas should be promoted
- Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses.
- Introduce consistency of approach on over concentration of student housing, hotels and short lets

Thriving Economy

- Designs of new office and retail development will be key to their sustainability
- Policy needs to define what types of “meanwhile uses” would be acceptable

Outstanding Environments

- A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible
- Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate.
- Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs
- Reference should be made to other historic assets not just archaeology in flood risk & SuDS policy
- Safeguards should be included to ensure that on site waste treatment facilities do not cause disturbance to neighbouring uses

Key Areas of Change

- Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan.
- Identification of heritage assets in the Thames Policy Area is recommended

The IIA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the IIA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan.

Mitigation measures will be incorporated into policies alongside any changes made in response to consultation comments.

8) Reasons for selecting alternatives, assessment method and difficulties encountered

In developing the City Plan 2036, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement

Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses. One of the main difficulties encountered is the uncertainty surrounding the UK's decision to leave the EU.

The objectives of the City Plan 2036 could be achieved through different policy options in some cases. Reasonable alternatives were evaluated for protection of offices, balance of land uses between commercial, housing retail hotels and other uses, infrastructure and security, river related uses and river transport, hotels and business accommodation, historic environment, tall buildings and views protection, energy & CO2 emissions, air quality, transport, waste, flood risk, open spaces, retail, housing numbers, location and tenure, social and community infrastructure.

The outcome of this assessment was used to identify the preferred options to take forward into policy for the draft City Plan 2036. Reasons for choosing the preferred option and rejecting other options have been included in this report (section 5.5).

9) Monitoring

Mitigation measures will be incorporated into policies alongside any changes made in response to consultation comments.

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Committee(s)	Dated:
Planning and Transportation Committee	30 October 2018
Subject: Draft City of London Transport Strategy	Public
Report of: Carolyn Dwyer, Department of the Built Environment	For Decision

Summary

The City of London Transport Strategy will set the 25-year framework for future investment in and management of the Square Mile's streets and for improvements to transport connections. The Transport Strategy and supporting three-year Delivery Plan will together form the City Corporation's third Local Implementation Plan (LIP). The Transport Strategy will be reviewed every five years and the Delivery Plan updated on an annual basis.

The development of the Transport Strategy has been informed by extensive engagement with City workers, residents, businesses and other organisations with an interest in transport in the Square Mile. The most recent phase of engagement consulted on the draft vision, aims and outcomes for the Transport Strategy, all of which were supported by the majority of respondents.

This report seeks approval to consult on the draft Transport Strategy. Subject to approval, consultation will take place between 12 November 2018 and 14 January 2019. The final Strategy will be submitted for adoption by the Planning and Transportation Committee and the Policy and Resources Committee in March 2019, and the Court of Common Council in April 2019.

The draft Transport Strategy aims to:

- Ensure the Square Mile is a healthy, attractive and easy place to live, work, learn and visit.
- Support the development of the Square Mile as a vibrant commercial centre and cultural destination.

To achieve these aims the draft Strategy includes proposals to:

- Make the Square Mile's streets great places to walk and spend time by prioritising the needs of people on foot and delivering world-class public realm
- Make the most efficient and effective use of street space, by significantly reducing motor traffic and changing the way the kerbside is managed and used
- Make the Square Mile more accessible, including developing and implementing a City of London Street Accessibility Standard and championing step-free access for all stations in the City
- Eliminate death and serious injuries from our streets through measures to deliver safer streets, reduce speeds, improve the safety of vehicles and encourage safer behaviours

- Enable more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant
- Improve air quality and reduce noise by encouraging and enabling the transition to zero emission capable vehicles
- Reduce the number of delivery and servicing vehicles in the Square Mile, particularly in the Square Mile at peak times
- Minimising the impacts of streetworks and other planned and unplanned disruption on users of the City's street
- Maximising the opportunities presented by new transport technologies while avoiding negative impacts and unintended consequences
- Working with TfL, national government and transport providers to improve local, national and international transport connections to the Square Mile

On 9 October, Members of the Local Plan Sub-Committee approved the draft Transport Strategy for final presentation to the Planning and Transportation Committee.

Recommendation(s)

Members are asked to approve the draft Transport Strategy for consultation.

Main Report

Background

1. The City Corporation does not currently have a Transport Strategy. There is now a need for a proactive approach to addressing the transport challenges facing the Square Mile, particularly those relating to recent and forecast growth in employment. This challenge is particularly acute in the City Cluster, where a significant increase in working population will require considerable changes to streets, particularly providing more space for people walking.
2. The Transport Strategy covers the next 25-years and will be supported by a three-year Delivery Plan and a series of shorter-term Action Plans, for example the Road Danger Reduction Action Plan. Together, the Transport Strategy and Delivery Plan form the City Corporation's Local Implementation Plan (LIP). The LIP is a statutory document that sets out how the City Corporation will help deliver the Mayor of London's Transport Strategy (MTS).
3. The development of the Transport Strategy has been informed by significant public and stakeholder engagement. Activities undertaken in Phase 1, which ran in February and March 2018, included:
 - **City Streets public survey:** 1949 people responded to survey questions on their perceptions of the City's streets, priorities for the use of streets and kerb-side space, and ideas and suggestions for future street and transport improvements.

- **Stakeholder workshops:** 77 representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops to share their views on the transport challenges and opportunities.
 - **City Streets exhibition:** A supporting exhibition was held at the City Centre on Basinghall Street from 5 February to 31 March 2018. The exhibition took visitors through historic and recent changes to the City's streets and presented future challenges. More than 7000 people visited the City Centre over the two-month period.
4. The key themes emerging from this first phase of engagement were that:
 - Motor traffic levels on the City's streets are too high
 - People walking in the Square Mile are not given enough priority or space
 - Conditions for cycling in the Square Mile need to be improved and made safer
 - More greenery and seating should be provided on streets and the quality of the public realm improved
 - Air quality in the Square Mile needs to be urgently improved
 - There is potential to use streets more flexibly to accommodate the various demands on them at different times of the day
 - The City's streets are not accessible to all
 - The management of freight needs to be improved
 5. A second phase of engagement was held in June and July 2018. This sought people's view on the proposed vision, aims and outcomes for the Transport Strategy. 500 people responded to the consultation survey.
 6. Overall, there was strong support for the proposed vision, aims and outcomes, with all supported or supported conditionally by between 77% and 92% of respondents. The outcome receiving the strongest support was 'People using our streets and public spaces are safe and feel safe'. The lowest levels of support were for the 'People enjoy a relaxed cycling experience in the Square Mile' and 'Emerging transport technologies benefit the Square Mile' outcomes. Further details are provided in the Phase 2 engagement report (Appendix 1).
 7. A Citizens Panel, made up of 40 independently recruited City workers and residents, met three times during the development of the Strategy. This panel, which was facilitated by Populus, provided an opportunity to gain a deeper understanding of residents and workers' transport needs and concerns. The second meeting allowed the Panel to feedback on the draft vision, aims and outcomes. The final meeting sought feedback on the draft proposals. A write up of all three meetings is included as an appendix to the Phase 2 engagement report.
 8. A Strategy Board, made up of City business representatives, representatives from Greater London Authority and TfL and external transport experts, met three times during the development of the Strategy. The Board provided advice and acted as a sounding board during the development of the Strategy.

Draft Transport Strategy

9. The draft Transport Strategy is provided in Appendix 2. The document sets out the visions, aims and outcomes for the transport in the Square Mile and detailed proposals for achieving these. It also provides an overview of how the Strategy will be delivered and progress monitored and reported.

Vision, aims and outcomes

10. While there were high levels of support for the draft vision, aims and outcomes, several changes to wording were suggested. These are reflected in the draft Strategy.

Consultation text	Current draft text
Vision	
The Square Mile enjoys world-class connections and streets that inspire and delight.	Streets that inspire and delight, world class connections and a Square Mile that is accessible to all.
Consultation text	Current draft text
Aims	
Ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit.	Ensure the Square Mile is a healthy, attractive and easy place to live, work, learn and visit.
Support the development of the Square Mile as a vibrant commercial centre and cultural destination.	No change
Outcomes	
The Square Mile is a great place to walk and spend time	The Square Mile's streets are great places to walk and spend time
Street space is used more fairly and effectively	Street space is used more efficiently and effectively
Our streets are accessible to all	The Square Mile is accessible to all
People using our streets and public spaces are safe and feel safe	No change
People enjoy a relaxed cycling experience in the Square Mile	More people choose to cycle

Consultation text	Current draft text
The Square Mile is cleaner and quieter	Our air and streets are cleaner and quieter
Delivery and servicing needs are met in ways that benefit the Square Mile	Delivery and servicing are more efficient, and impacts are minimised
Our street network is resilient to changing circumstances	No change
The Square Mile benefits from better transport connections	No change
Emerging transport technologies benefit the Square Mile	No change

Proposals

11. The Transport Strategy includes 54 proposals for achieving the vision, aims and outcomes. The approach to delivering each outcome is summarised below.

- a. Make the Square Mile's streets great places to walk and spend time by prioritising the needs of people on foot and delivering world-class public realm. This includes increasing the number of pedestrian priority streets and accepting that delivering priority for people walking may result in delays or reduced capacity for other street users.
See proposals 2 – 10 for further details.
- b. Make the most efficient and effective use of street space, aiming for a 25% reduction in motor traffic by 2030 – partly achieved by supporting and championing the introduction of next generation road user charging.
See proposals 11 – 15 for further details.
- c. Make the Square Mile more accessible, including developing and implementing a City of London Street Accessibility Standard and keeping pavements clear of obstructions.
See proposals 16 – 19 for further details.
- d. Eliminate death and serious injuries from our streets through a priority investment programme to deliver safer streets, reducing speeds (including introducing a City-wide 15mph speed limit), improving the safety of vehicles and encouraging safer behaviours.
See proposals 20 – 23 for further details.
- e. Enable more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant, with a focus on establishing a core City cycle network.
See proposals 24 – 28 for further details.

- f. Improve air quality and reduce noise by encouraging and enabling the transition to zero emission capable vehicles, including encouraging the Mayor and TfL to establish central London Zero Emission Zone. In the meantime, establishing local Zero Emission Zones covering the City Cluster and the Barbican and Golden Lane estates.

See proposals 29 – 37 for further details.

- g. Reduce the number of delivery and servicing vehicles, particularly the numbers in the Square Mile at peak times, through consolidation, retiming and increasing the use of the Thames for freight.

See proposals 38 – 39 for further details.

- h. Minimising the impacts of streetworks and other planned and unplanned disruption on all street users, and in particular people walking and cycling.

See proposals 40 – 42 for further details.

- i. Maximising the opportunities presented by new transport technologies while avoiding negative impacts and unintended consequence, including establishing a Future Transport Programme to work with developers of new transport technologies.

See proposals 43 – 45 for further details.

- j. Working with TfL, national government and transport providers to improve local, national and international transport connections to the Square Mile

See proposals 46 – 51 for further details.

Transport Strategy Delivery Plan

- 12. The Transport Strategy Delivery Plan will provide details of the projects that will be delivered between 2019/20 and 2021/22. It will be submitted to Members in early 2019 for approval, following the completion of the Department of the Built Environment project review. Subject to approval it will then be published alongside the final Transport Strategy and updated on an annual basis.
- 13. The Transport Strategy and relevant sections of the Delivery Plan will act as the City Corporation's LIP. The LIP is a statutory document that sets out how the City Corporation will support the delivery of the MTS. There is good alignment between the Transport Strategy and the MTS, which seeks to improve London's streets to make them healthy, inclusive and safe, provide a good public transport experience and support the delivery of homes and jobs.
- 14. The sections of the Delivery Plan that are required for the LIP will be presented in draft to this Committee on 20 November. Subject to approval they will then be submitted to TfL for review.

Consultation

- 15. Consultation on the draft Transport Strategy is due to run from 12 November 2018 to 14 January 2019. The consultation will be widely promoted through newspaper adverts, internal and external newsletters, social media, the Transport Strategy mailing list, flyers and the City of London website. Transport Strategy consultation activities will also be

used to promote the Local Plan consultation and vice versa. The main consultation activities are summarised below.

16. **Consultation website:** A bespoke consultation website will allow people and organisations to indicate their level of support for and comment on all proposals. To maximise the volume of feedback received and cater for all interest levels the website will allow users to tailor the level of detail they see and respond to by choosing one of the following options:
- Ten 'key proposals' that are likely to be of most interest and will result on some of the most significant changes. These are:
 - Proposal 2: Put the needs of people walking first when designing and managing our streets
 - Proposal 11: Take a proactive approach to reducing motor traffic
 - Proposal 14: Make the best and most efficient use of the kerbside and car parks
 - Proposal 17: Keep pavements free of obstructions
 - Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero
 - Proposal 24: Apply a minimum cycling level of service to all streets
 - Proposal 29: Support and champion a central London Zero Emission Zone
 - Proposal 38: Reduce the number of freight vehicles in the Square Mile
 - Proposal 41: Reduce the impact of construction and streetworks
 - Proposal 43: Establish a Future Transport Programme
 - Proposals grouped by topic or topics, e.g. transport mode
 - All proposals, organised by outcome
17. **Stakeholder briefings:** Three briefing sessions are planned for 30 November at the Guildhall Art Gallery. We will invite organisations with an interest in transport in the Square Mile and members of the Active City Network. Briefings will consist of a presentation on the draft Strategy followed by questions.
18. **Drop-in sessions:** Eight public drop-in sessions will be held over the consultation period in the City Corporation's libraries and in Guildhall reception. Members of the Strategic Transportation team will be available at these sessions to provide information, answer questions and note any comments and feedback.

Corporate and Strategic Implications

19. The delivery of the Transport Strategy supports the delivery of Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4. The relationships between Transport Strategy and Corporate Plan outcomes are mapped in Appendix 3.
20. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this relationship, relevant policies and proposals in City Plan 2036 and this Strategy are aligned. In

particular, several proposals support and respond to the significant change anticipated in the Key Areas of Change.

Financial implications

21. The delivery of this Transport Strategy will be funded from a range of sources, including:

- Money received from TfL, including:
 - LIP Corridors and Neighbourhoods – an annual allocation that contributes to projects identified in our LIP
 - Liveable Neighbourhoods – funding for large projects that encourage walking, cycling and the use of public transport, allocated through a bidding process
 - Strategic funding – funding for specific priorities or initiatives, such as cycling infrastructure, air quality improvements and bus priority
- The City Corporation's on-street parking reserve – reinvesting revenue from parking charges and penalty charge notices
- Contributions from developers through the Community Infrastructure Levy, Section 106 and Section 278

22. The long-term nature of the Transport Strategy means it is not possible to scope the full cost for all projects and programmes. However, a core principle will be to generate the necessary revenue/funding to make the delivery of this Strategy largely self-supporting.

Integrated Impact Assessment

23. The City Corporation has commissioned an Integrated Impact Assessment (IIA) of the Transport Strategy. The IIA brings together Strategic Environmental Assessment, Equality Impact Assessment and Health Impact Assessment into a single assessment.

24. The assessment report for the draft Strategy is currently being finalised by the consultants and will be published on our website alongside the draft Transport Strategy. The consultant's draft identifies the potential for significant positive effects under all the Transport Strategy outcomes. No significant negative effects have been identified.

25. The draft IIA chapter on the cumulative effects of the Transport Strategy is included in Appendix 4. This includes a table summarising the effects of each proposal on the IIA objectives:

- Economic growth
- Built environment and public realm
- Safe environment and crime reduction
- Heritage assets
- Waste management
- Environmental protection (pollution)
- Climate change mitigation and resilience
- Open spaces

- Biodiversity and urban greening
- Social and cultural facilities
- Health
- Education
- Equality and inclusion

Conclusion

26. The vision, aims, outcomes and proposals represent a radical and ambitious approach to tackling the transport challenges facing the Square Mile. The delivery of the Transport Strategy will help support the City's growth and ensure the Square Mile remains an attractive place to work, live, learn and visit.
27. On 9 October, Members of the Local Plan Sub-Committee approved the draft Transport Strategy for final presentation to the Planning and Transportation Committee.
28. Subject to approval consultation on the draft Transport Strategy will take place between November 2018 and January 2019. The final Strategy will be submitted for adoption by the Planning and Transportation Committee and the Policy and Resources Committee in March 2019, and the Court of Common Council in April 2019.

Appendices

- Appendix 1 – Phase 2 Engagement report
- Appendix 2 – Draft Transport Strategy
- Appendix 3 – Corporate Plan outcome mapping
- Appendix 4 – Draft Integrated Impact Assessment: Cumulative effects

Background Papers

City of London Transport Strategy – scope, process and programme, Planning and Transportation Committee, 12 December 2017

Transport Strategy – Vision, aims and outcomes, Planning and Transportation Committee, 29 May 2018

Transport Strategy - Phase one engagement report, Planning and Transportation Committee, 29 May 2018

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Appendix 1 – Phase 2 survey responses



City of London Transport Strategy Phase 2 engagement report

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1

Introduction

1.1 Introduction

Engagement phases and activities

The City of London Corporation is currently drafting its first long-term Transport Strategy. This will set the 25-year framework for future investment in and management of the Square Mile's streets.

The development of the Transport Strategy will be informed by three phases of public and stakeholder engagement. The first phase took place in February and March 2018 and identified key transport issues and challenges. The second phase, to consult on the draft vision, aims and outcomes of the Strategy, took place in June and July 2018. The third phase of engagement, to consult on the draft Strategy, will take place from November 2018 to January 2019.

This report outlines the findings from the second phase of engagement which involved:

- A public survey which asking people to indicate their level of support for the draft vision, aims, outcomes
- Stakeholder briefing sessions which presented the vision, aims, and outcomes, and provided an opportunity for stakeholders to ask questions and give feedback
- A Citizens Panel where City residents and workers took part in voting and discussion tasks that provided feedback on the vision, aims and outcomes (independently facilitated by Populous)
- Drop-in sessions where members of the Strategic Transportation team were available to answer questions and discuss the vision, aims and outcomes

1.2 Phase 1 results summary

Phase 1 engagement - key findings

The first phase of engagement – to identify key issues and challenges – took place in February and March 2018. The engagement activities undertaken during this phase included a public survey, stakeholder workshops, a meeting of the Citizens Panel, drop-in sessions, and the City Streets exhibition held at the City Centre, Guildhall. The results of this engagement have informed the development of the development of the Transport Strategy.

Eight key themes were identified from the over 2000 survey responses and in-person comments across all of the Phase 1 consultation activities. These themes were:

1. *Traffic levels on City streets are too high* – over 1400 survey respondents felt that motor traffic levels on City streets are too high
2. *Prioritise people walking* – a significant majority (over 80%) of survey respondents and nearly all workshop participants felt that not enough street space was allocated to people walking
3. *Improve cycling infrastructure and make cycling safer* – a majority of survey respondents felt that people cycling were underprioritised and given too little space on City streets
4. *Greenery, seating, and improving the public realm* – greening the City was the largest non-transport related request made by respondents and ranked sixth overall for most mentioned comment type
5. *City air pollution needs immediate improvement* – Citizen Panel members highlighted the need for cleaner local air and survey respondents scored the quality of the City's air the lowest out of 10 indicators of healthy, vibrant streets
6. *Support for using streets more flexibly* – the opportunity to use our streets more flexibly to accommodate the various demands on them at different times of the day was highlighted at most of our engagement workshops

7. *Improve accessibility on City streets* – approximately 7% of survey respondents reported having an activity-limiting health problem or disability, with more than 100 of these individuals leaving comments on how to make the City a more accessible place, especially through reducing both air pollution and motor vehicle volumes. The need to improve accessibility was also raised at workshops and by the Citizens Panel
8. *The need to improve the management of freight* – reducing freight traffic volumes and impacts was perceived by nearly all workshop participants, as well as the Citizens Panel, as both a significant challenge and a great opportunity for improving our streets

Phase 1 survey - key topics

We asked how survey participants would improve the City's streets and over 800 people responded with their ideas and concerns. Their comments were sorted and analysed and a list of the top 10 individual topics were developed to help inform the Transport Strategy. Those topics were:

1. Reduce motor traffic
2. More protected cycle lanes
3. A ban on all motor vehicles
4. Wider pavements
5. Enforcing cyclists to follow the Highway Code
6. More greenery
7. Reduce air pollution
8. Prioritise walking and cycling
9. More pedestrian priority
10. A ban on private cars

Overall the first phase of engagement period highlighted the need to think differently and be radical when attempting to improve our streets. The full report is available on the [Transport Strategy](#) webpage.

1.3 Data protection and use

A significant amount of data was collected from the Phase 2 engagement respondents in order to inform the development of the Transport Strategy. The following paragraphs detail our data protection and usage policy and how it relates to the survey and consultation.

The City of London Corporation is a registered data controller in respect of processing personal data under the relevant data protection legislation. This includes the Data Protection Act 1998, Data protection Act 2018 and the General Data Protection Regulation (GDPR). Further relevant details are presented below.

Any personal data provided by respondents, for the purposes of this survey, has been done so in accordance with the requirements of the EU-U.S. Privacy Shield. The personal data processed by the City, and by the processor, for the purposes of this Survey, has been done so on the legal basis of respondents' consent.

Any respondent who took part in this survey has the right to request a copy of their data, ask us to make changes to ensure that their data is up to date, ask that the City deletes their information or object to the way we use their data. To do this please write to Data Protection Officer, City of London, PO Box 270, Guildhall, London, EC2P 2EJ or email information.officer@cityoflondon.gov.uk.

Readers may reproduce any figure in this report with reference to the Strategic Transportation Team, Department of the Build Environment, City of London Corporation. If you have any questions regarding the contents of this report, please contact strategic.transportation@cityoflondon.gov.uk.

2

Phase 2 survey results

2.1 Survey introduction

Survey contents

This chapter provides a summary of analysis of the responses from the City of London Corporation's *Transport Strategy Phase 2 Consultation Survey* (the survey). This survey was hosted on Typeform.com and gathered public feedback on the Transport Strategy's proposed vision, aims, and outcomes, alongside demographic and travel behaviour information.

The vision we consulted on was:

The Square Mile enjoys world-class connections and streets that inspire and delight

The aims we consulted on were:

Ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit

Support the development of the Square Mile as a vibrant global commercial centre and cultural destination

The outcomes we consulted on were:

1. *The Square Mile is a great place to walk and spend time*
2. *Our streets are accessible to all*
3. *People using our streets and public spaces are safe and feel safe*
4. *People enjoy a relaxed cycling experience in the Square Mile*
5. *The Square Mile is cleaner and quieter*
6. *Delivery and servicing needs are met in ways that benefit the Square Mile*
7. *Street space is used more fairly and effectively*
8. *Our street network is resilient to changing circumstances*
9. *The Square Mile benefits from better transport connections*
10. *Emerging transport technologies benefit the Square Mile*

The survey was open to any individual that had recently travelled to or through the City and asked whether respondents supported the draft vision and aims, and each draft outcome. Respondents that didn't fully support any element of the draft consultation were then asked for additional comments. The survey was launched on 4 June 2018 and was open for nine weeks. Respondents could fill in the survey online, in person at any *Phase 2* drop-in event, or by mail-in paper copy.

Chapter structure

This chapter is structured as follows:

- Section 2.2 provides an overview of the survey respondent demographic profile and their travel behaviours
- Section 2.3 presents the overall levels of support for the draft vision, aims, and outcomes and breaks these support levels down by respondent groupings and by outcome
- Section 2.4 summarises the analysis and findings from all open text responses to the survey
- Section 2.5 details specific comments on requests for changes related to the wording of the draft vision, aims, and outcomes
- Section 2.6 summarises the various institutional and organisational responses to the survey alongside written responses we received during the consultation period

2.2 Demographic profile and travel behaviours

Respondent profile

Just over 500 individuals and organisations responded to the Phase 2 engagement survey. The gender split of these individuals was around 70 per cent men and 30 per cent women (with less than 1 per cent self-describing their gender) and the average respondent age was 45. Prior to feeding back on the draft vision, aims, and outcomes we asked every respondent for their reasons for travelling to the City and the modes they use to both travel to/from and travel around the Square Mile. Figures 2.2.1 and 2.2.2 show the responses to these two questions for all respondents.

Figure 2.2.1 (right) shows the reasons people said they travel to or through the City for both the Phase 1 respondent group (in orange) and Phase 2 respondent group (in green). There was no statistically significant change between the two groups in the surveys regarding their journey purposes.

Figure 2.2.2 (below) shows the modes people said they use to commute or travel to the City (in red) and how they travel around the City (in blue). The lighter colours represent the Phase 1 survey results for comparison. All modes except vans, motorcycles and mopeds, and cars saw a significant increase in the number of people who said they were using them to travel both to and through the City (this could potentially be a result of the Typeform survey in being easier to use than the Phase 1 SurveyMonkey survey).

Figure 2.2.1 Comparison of reasons respondents travelled to/through the City in Phase 1 and 2 surveys*

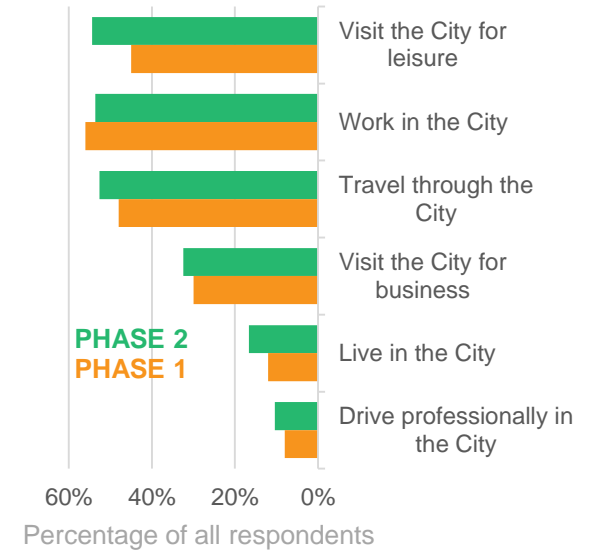
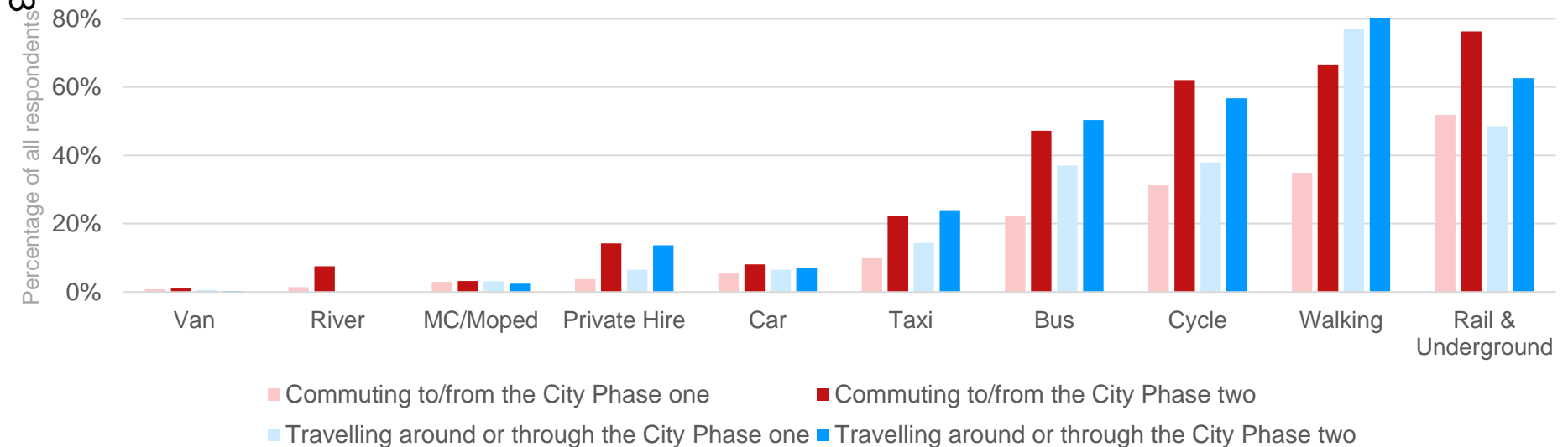


Figure 2.2.2 Comparison of modes used to commute to/from and around the City in Phase 1 and Phase 2 surveys*



* Multi-select responses

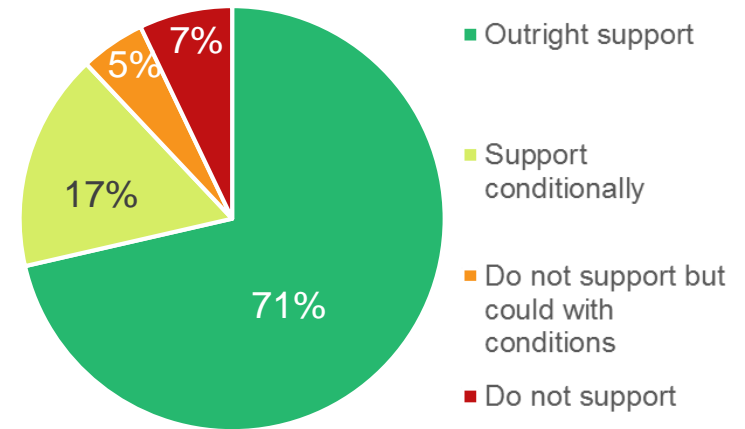
2.3 Cumulative levels of support

Overall levels of support and support by grouping

We asked respondents whether they 'supported', 'supported with changes', 'did not support but could with changes', 'did not support', or 'did not have an opinion on' the draft vision, aims and each of the outcomes. The following figures use "support conditionally/do not support but could with conditions" in place of the second and third options above as many respondents did not explicitly suggest changes but indicated their support would depend on what proposals emerged from each outcome in the final Transport Strategy document.

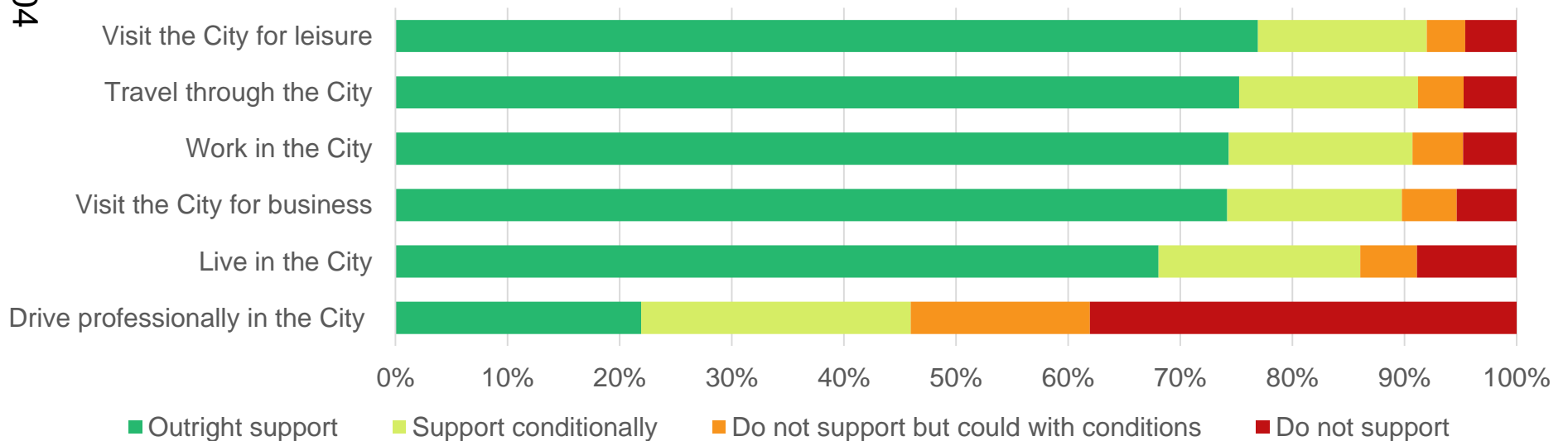
Figure 2.3.1 (right) shows the cumulative level of support for the draft vision, aims, and outcomes for all respondents (excluding those who did not have an opinion, which was less than one per cent). The level of outright support across the entire consultation was 71 per cent. Figure 2.3.2 (below) shows the cumulative level of support for respondents grouped by reason for travelling to/through the City. All groups of respondents except for professional drivers in the City had outright support levels above 68 per cent. Professional drivers represented roughly 1 in 10 respondents to the consultation, with an overwhelming majority of these respondents indicating they travel by taxi.

Figure 2.3.1 Overall support level for the draft vision, aims and outcomes



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Figure 2.3.2 Overall support level for the draft vision, aims and outcomes grouped by reason to travel to/through the City



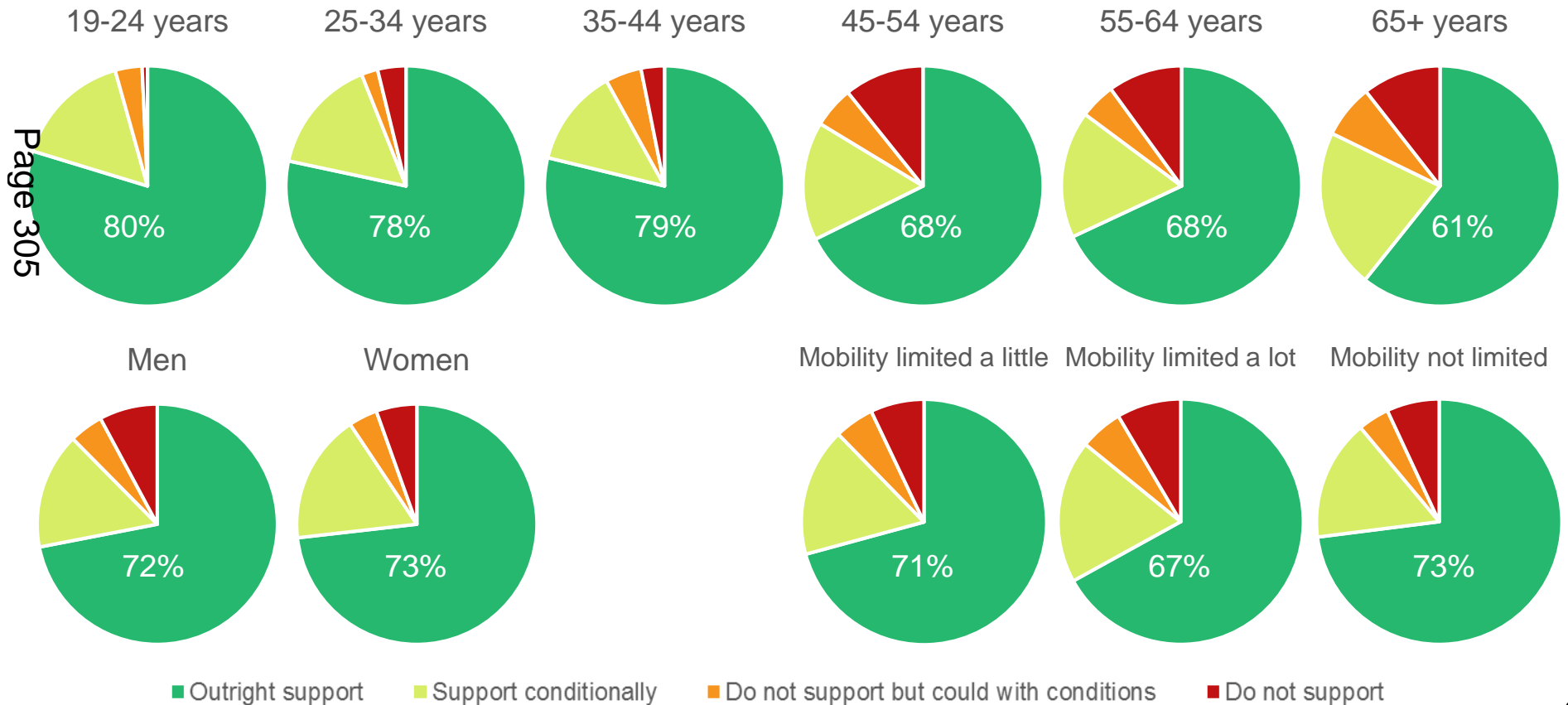
2.3 Cumulative levels of support

Levels of support by grouping (continued)

Figure 2.3.3 (below) shows the cumulative levels of support for respondents grouped by respondent age, sex, and mobility. Some key findings are listed below:

- Four in five people aged 19-44 outright supported the strategy compared to only three in five people aged 65+
- There was no statistically significant difference in support between men and women
- People whose mobility was limited 'a lot' outright supported the strategy at slightly lower rates than all other respondents
- The grouping with the highest levels of conditional support were those 65+ years old

Figure 2.3.3 Overall support level for all responses to the draft vision, aims, and outcomes by various groupings



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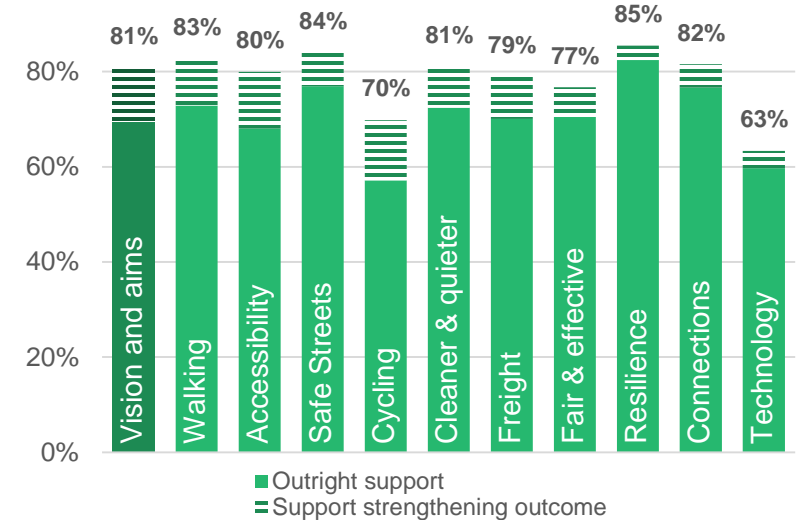
2.4 Levels of support by outcome

Levels of support for the vision, aims and each outcome

Figure 2.4.2 (below) shows the percentages of respondents that *supported*, *supported with conditions*, *did not support but could with conditions*, and *did not support* the vision, aims and each outcome. Support for the ten outcomes ranged from 57 per cent for the cycling-themed outcome to 82 per cent for the resilience-themed outcome.

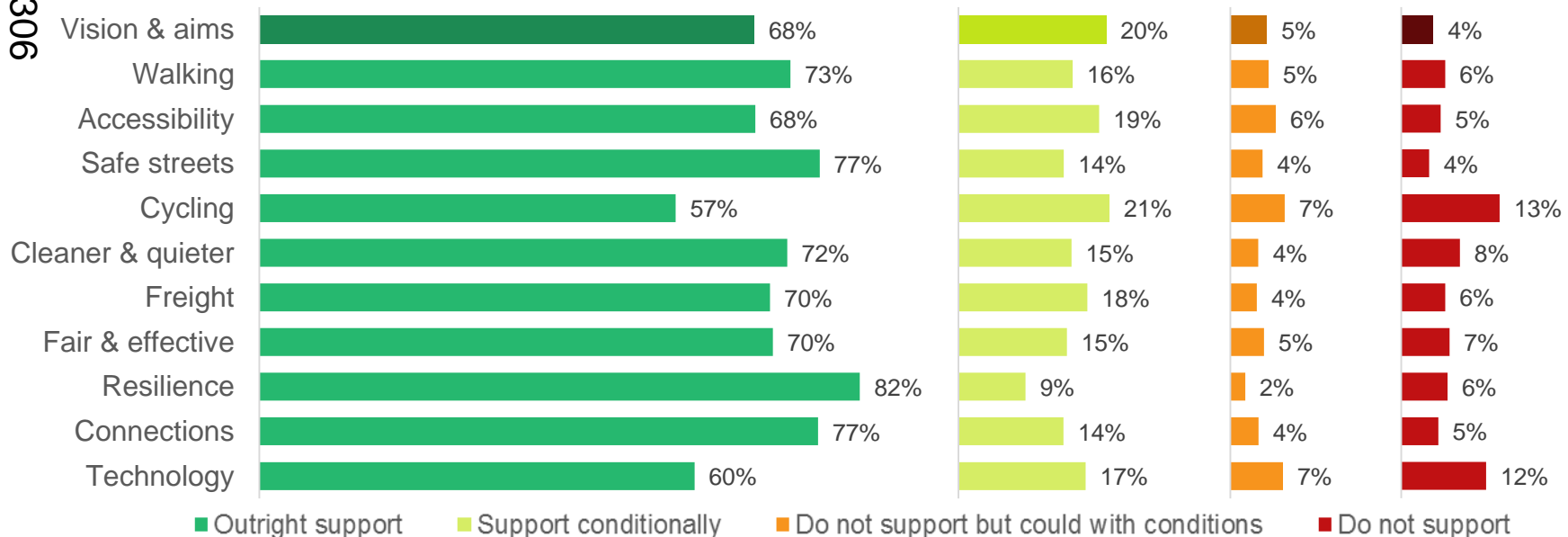
More analysis was undertaken to understand the overall levels of support for the vision, aims and outcomes. The survey asked respondents to provide comments and feedback whenever they did not outright support the vision and aims or any of the ten outcomes. All comments that accompanied a *support with conditions*, *do not support but could with conditions*, or *do not support* response were assigned one of three possible intentions: support conditional on *strengthening* outcome, support conditional on *weakening* outcome, and comment *not relevant to outcome strength*. Figure 2.4.1 (right) shows overall support levels after adding respondents who outright supported an outcome and those whose support was conditional on the *strengthening* of the outcome.

Figure 2.4.1 Combined outright support and support conditional on strengthening outcomes



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Figure 2.4.2 Support levels for the vision, aims and each outcome



2.5 Open text response analysis

Overview and methodology

The survey asked respondents to provide comments and feedback whenever they did not outright support the vision, aims or an outcome. Over 1500 additional comments and responses were received.

Each response was reviewed and analysed by categorising the subject of each comment into one or more 'topics tags' in a similar approach to the Phase 1 open text response analysis. Full details of the methodology can be found in the Phase 1 engagement report on the [City of London Transport Strategy](#) webpage.

Over 70 unique response topics linked to five or more individual comments were identified through this process. All topics which were linked to 20 or more individual comments are listed below according to their theme or mode. These topics represent the issues and suggestions that were most often discussed in respondent comments and feedback.

Walking

- More pedestrian prioritisation

Walking and cycling

- Prioritise people walking and cycling
- Reduce conflicts between people walking and cycling

Cycling

- Improve enforcement and compliance of cyclists on streets
- Improve cycling infrastructure
- De-prioritise cyclists
- More segregated cycle lanes

Motor vehicles

- Reduce motor vehicle volumes
- Concerns around traffic volumes being too high
- Introduce a freight/delivery vehicle timed ban
- Introduce a City-wide motor vehicle ban
- Improve taxi access
- Concerns around autonomous vehicles

Transport Strategy impacts

- Concerns around how the strategy would impact congestion
- Concerns around how the strategy would impact the "working City"

Urban Realm

- More greenery
- Reduce air pollution

Accessibility

- Improve disabled/mobility impaired access across the City

Wording

- Suggestions for improving/editing wording
- Requests for more information on proposals
- Indications that wording was vague

Overall these topics broadly aligned with the comments received in the Phase 1 engagement survey with a few notable exceptions:

- the outcome *Emerging transport technologies benefit the Square Mile* generated a lot of negative feedback regarding autonomous vehicles
- A number of outcomes had their wording questioned and many respondents felt we were 'too vague'
- Some respondents believed that the City was a 'working City' and was not a place for leisurely walking or cycling

2.6 Comments on vision, aims and outcomes wordings

As discussed in section 2.5 the survey asked respondents to provide comments and feedback whenever they did not outright support the vision, aims or an outcome. A number of respondents made specific comments in reference to the wording of the vision, aims and outcomes. The most frequent wording comments were regarding;

- The appropriateness of the word 'relaxed' in *People enjoyed a relaxed cycling experience in the Square Mile*
- The meaning of the word 'fair' in *Street space is used more fairly and effectively*
- Why 'freight connectivity' was included in *The Square Mile benefits from better transport connections*

A sample of comments are provided below and opposite. These comments were used to inform the final wording of the vision, aims and outcomes.

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Vision & Aims	Comment
<p>Vision: <i>The Square Mile enjoys world-class connections and streets that inspire and delight</i></p> <p>Aims:</p> <ul style="list-style-type: none"> • <i>Ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit</i> • <i>Support the development of the Square Mile as a vibrant global commercial centre and cultural destination</i> 	<p>"I'd like to see more explicit mention of environmental sustainability"</p> <p>"Please consider re-ordering your list into "healthy, attractive and easy"</p>

Outcome	Comment
<i>The Square Mile is a great place to walk and spend time</i>	"The reduction in motor traffic needs to be clear, is that for those outside of the city coming in with a different rule for city's elderly resident population who require transport by car."
<i>Our streets are accessible to all</i>	"It needs to be made explicit that vehicular access will be provided at minimum levels. "appropriate" is too vague"
<i>People using our streets and public spaces are safe and feel safe</i>	"not sure if safety and security are being confused,. They are not the same."
<i>People enjoy a relaxed cycling experience in the Square Mile;</i>	"I'm not convinced about the word "relaxing". In the end, its a city."
<i>The Square Mile is cleaner and quieter</i>	"Please consider adding the elimination of light pollution to this outcome"
<i>Delivery and servicing needs are met in ways that benefit the Square Mile</i>	"I am not clear how the methods can "maximise" benefits - I think the idea is to minimise negatives"
<i>Street space is used more fairly and effectively</i>	"I am not sure about the use of the word fair? Perhaps it can just be effective? or to meet the requirements of the people in the Square Mile?"
<i>Our street network is resilient to changing circumstances;</i>	"Really supportive of this, but check if the term resilient is widely understood or not?"
<i>The Square Mile benefits from better transport connections</i>	"remove "freight connectivity" as it implies the continuation of road freight through the City"
<i>Emerging transport technologies benefit the Square Mile</i>	"Not sure what you mean by emerging transport technologies??"

2.7 Institutional/organisational responses

Institutional responses to the survey

Representatives from 15 organisations and institutions responded to the Phase 2 engagement survey directly. Responses were received from:

- Living Streets
- London Living Streets
- Living Streets Kings Cross Local Group
- Eco Cycle Ltd.
- Flit Technologies Ltd.
- London Travelwatch
- Natixis
- The Port of London Authority
- Ramblers Inner London
- Cantillon Ltd
- Sustrans
- Trinity Bars
- Waltham Forest Streets for All
- Balls Brothers
- Transport for All
- London Forum of Amenity & Civic Societies

Figure 2.7.1 Cumulative support level for all institutional/organisational responses to the draft vision, aims and outcomes

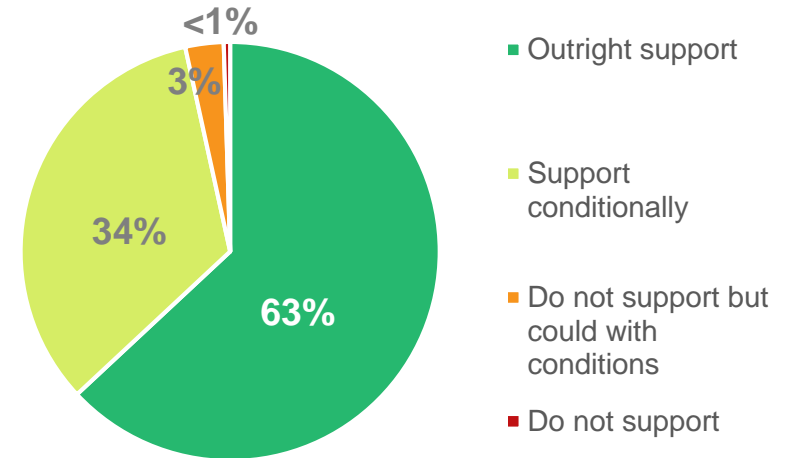


Figure 2.7.1 (above) shows the cumulative levels of support of the draft vision, aims, and outcomes for the organisations and institutions listed above. Their comments and responses were found to be relatively similar to those of individual respondents. The responses of those organisations that provided comments directly through the Typeform survey are summarised below:

Living Streets, London Living Streets, and Living Streets Kings Cross Local Group all showed broad support for the vision, aims, and outcomes, and highlighted the importance of delivering streets for all that improve priority for people walking and vulnerable users. They also stressed the importance of reallocating street space for pedestrians and using temporary interventions to trial and accelerate strategy delivery.

Eco Cycle Ltd. highlighted the importance of safe and secure cycling parking as a way to encourage and enable more people to cycle.

Flit Technologies Ltd. noted that emerging technologies and innovations can play an important role in delivering the vision, aims, and outcomes.

London Travelwatch wanted pavements to be kept clear of unlicensed obstructions.

The Port of London Authority noted that reference could be given to the potential to shift more freight onto the River Thames.

Cantillon Ltd. Noted that demolition and construction work cannot be carried out by small electric vehicles and consideration will need to be given to these activities when working towards our air pollution and emissions ambitions. They also indicated that pushing these activities outside of regular working hours disrupts the work-life balance of many workers.

Sustrans highlighted the importance of accessibility for all; ensuring that security measures in the public realm do not have a detrimental impact on the accessibility of people walking and cycling; ensuring that people walking, cycling and taking public transport are prioritised; using 'tactical urbanism' and temporary interventions to accelerate change; and that the technology outcome highlights the importance of delivering Healthy Streets.

Waltham Forest Streets for All indicated their resistance to shared space, removing parking, speed humps, and traffic reduction and commented on the need to separate streets users and particularly people cycling from other users.

Ball Brothers commented on the importance of allowing freight activities during peak times in exceptional circumstances.

Transport for All highlighted the importance of designing new cycling infrastructure in such a way as to not act as a barrier to mobility limited people and indicated their resistance to 'flexible' streets.

2.7 Institutional/organisational responses (cont'd)

Written institutional responses

Representatives from nine organisations and institutions sent written responses to the consultation. Their responses were generally supportive and are summarised below:

British Land were supportive of the proposals to improve the quality and use of street space for people. They also supported prioritising pedestrians over vehicles in a number of places across the City.

The **City Property Association** were supportive of the overall transport vision and aims. They also supported safety for pedestrians, cyclists and motorcyclists; improving accessibility across the City; reducing traffic volumes on our streets; improving our public realm; using new transport technologies to deliver more inclusive, safe, attractive, and vibrant streets; and the use of Road User Charging in central London boroughs to help achieve our ambitions.

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3 of
10

The **Cross River Partnership** were supportive of the vision, aims and outcomes. Regarding the freight and servicing outcome they suggested that we amend the outcome to include an ambition to minimise the negative impacts of freight to promote healthier streets for all.

The **London Taxi Driver Association** were broadly supportive of certain outcomes. They noted that measures aimed at improving walking and cycling in the City of London should not create unnecessary barriers to using and hiring licensed taxis and that “pop-up” cycle lanes were preferred to permanent segregated cycle lanes to minimise unnecessary inconvenience to road users. They highlighted concerns around the number of stations in the City that do not have step-free access, and that air quality issues must be tackled as soon as possible.

The **London Cycling Campaign** were broadly supportive of the draft vision, aims, and outcomes. Regarding wording they felt that we should include the words “safe” and “sustainable” in the vision. They also questioned our use of the word ‘relaxed’ in the cycling outcome (similar to

a number of individual respondents), noting that improved and segregated cycling infrastructure is important to encouraging a wider range of people to cycle.

London Living Streets strongly supported the draft vision, aims, and the first nine outcomes, however they expressed concerns around the technology outcome and the potential negative impacts of autonomous vehicles on our streets. They also commented on the need for the City to design roads to ensure compliance with 20mph speed limits, prioritise pedestrians and ban vehicles in certain places across the City, minimise rat-running on local streets, introduce a Bank-like ban at Ludgate Circus, create new public spaces, and restrict EV charging points to car parks.

The **Motor Cycle Industry Association** found ‘little to disagree with in this consultation’. However, they expressed concerns regarding their perception that powered two-wheelers were not properly considered as part of the transport vision.

Transport for London supported the draft vision, aims, and outcomes and our adoption of the Healthy Streets Approach as the strategy’s framework.

UPS were generally supportive of the draft vision, aims, and outcomes. They also commented on supporting innovative ways of ensuring the feasibility of sustainable deliveries and logistics including through supporting companies wanting to electrify their fleets and considering how more space can be made available for container storage, e-tricycle parking, and electric vehicle charging.

3

Additional Phase 2 engagement activities

3.1 Stakeholder briefings and drop-in sessions

Stakeholder briefing sessions

Four briefing sessions were held for stakeholders on 29 June and 6 July 2018. These sessions consisted of a presentation on the draft vision, aims and outcomes followed by a question and answer session. The sessions were attended by over 50 stakeholder representatives.

The majority of questions asked were regarding further details on the outcomes and how they will be delivered. Specific questions were raised on;

- How the contrasting needs of City workers during the week and visitors at the weekend would be balanced
- How the Strategy would incorporate wayfinding and signage proposals
- How the Strategy would address reducing motor traffic and what our position was on road user charging
- How construction traffic and deliveries would be addressed, especially those freight and construction vehicles that are through traffic
- How the safety and security from hostile vehicles in the public realm would be addressed
- How more public realm could be incorporated given the City's narrow and medieval street pattern

Drop-in sessions

A series of consultation drop-in sessions were held at City libraries and in the reception of Guildhall. Members of the Strategic Transportation team were available to answer questions about the vision, aims and outcomes. Attendees were also able to complete the survey.

A combination of lunchtime and evening sessions aimed to make the drop-ins accessible to both City workers and residents. The sessions were advertised on the City Corporation website, through the Transport Strategy mailing list and through City Corporation social media.

Attendance at the drop-in sessions was low, but in line with expectations for engagement of this type - with four people attending in total.

Discussions at drop-in sessions largely reflected the issues raised by City Streets survey respondents and workshop participants. Feedback was given on wanting improved cycle safety and infrastructure, more space needed for people walking and cycling and support was given for the Bank on Safety experimental scheme.

3.2 Citizens Panel

Citizen Panel

Populus, a consultancy specialising in political, reputation, stakeholder and customer research, were appointed to facilitate a Citizens Panel of City workers and residents. This panel of 40 people – half residents, half workers - met three times during the development of the Transport Strategy to enable us to gain a deeper understanding of residents and workers' transport needs and concerns. Attendees took part in voting exercises and discussion tasks in relation to the vision, aims outcomes, and proposals, with Populus staff facilitating the discussion.

The second meeting of the Citizens Panel was held on 13 June 2018 and coincided with the second phase of consultation. In general, people were positive about the vision, aims, and outcomes. Their comments are summarised below.

The vision

The majority of the panel supported the vision; they felt it was very actionable, transformative and exciting. A small minority disliked it as traffic congestion wasn't fully addressed and wanted an increased focus on expanding street space and improvements of the roads.

The outcomes

Overall the panel felt that the list of ten outcomes were acceptable and were relevant to both workers and residents. Slight refinements were suggested around the area being accessible to all, safety, and using less jargon to explain the outcomes.

The panel identified five additional things they felt were missing from the outcomes:

- Increased disability access to make streets accessible to all
- More working streetlights and CCTV camera to feel safe
- Smoother and wider pavements to improve walking experience
- Enforced parking rules and extra signs to encourage using street space fairly
- Clean air policies to ensure the Square Mile is cleaner

The final meeting of the Citizens Panel was held on 6 September 2018. This allowed the Panel to provide feedback on the emerging Transport Strategy proposals. A full report of the findings from all three panel meetings can be found in the Appendix.

3.3 Strategy Board

Strategy Board

The Strategy Board is comprised of senior City business representatives and industry experts and acted as a sounding board for emerging proposals and advise the on the direction of the Strategy. The Board met three times over the course of the development of the Strategy, with the second meeting corresponding with the second phase of stakeholder engagement. Board membership included:

- The Greater London Authority
- Transport and Sustainable Development, University College London
- The Investment Association
- Five AI
- TheCityUK
- London First
- Transport Research Laboratory
- Energy Saving Trust
- The Confederation of British Industry
- The Barbican Centre
- The Federation of Small Businesses
- The City Property Association
- Transport for London
- The Centre for London
- London Travelwatch
- Future Cities Catapult

Appendix

Citizens Panel report

City of London

Transport Strategy Citizens Panel

Project Write Up

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OCTOBER 2018

Populus



Introduction

- The City of London Corporation is developing a Transport Strategy that will provide a 25-year framework for future investment in and management of the City's streets.
- The Strategy will detail an ambitious approach to transport and set out measures to respond to the challenges arising from significant growth, changing travel habits and the impacts of motor traffic and congestion.
- The City of London Corporation commissioned Populus, a consultancy that specialise in political, reputation, stakeholder and customer research, to facilitate a Citizens Panel of City residents and workers throughout the development of the Strategy.
- Populus designed three Citizen Panel sessions to be undertaken during the Strategy's development to gain a deeper understanding of residents and workers transport needs and concerns and to gain feedback and comments on the main elements of the Strategy as they were developed.

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Methodology & Objectives

Overview of Methodology



Objectives

1. To gain an independent and in-depth understanding of the transport priorities of a 'typical' group of City workers and residents to inform the development of policies for the Transport Strategy
2. Test emerging transport policies with a typical cross-section of the City's population in an independent setting to be fed to the Transport Strategy team
3. Understand the public responses to emerging policies and the way these policies are communicated
4. Create a panel that may be engaged for further research following the completion of the Strategy

Sample

We recruited both people who resided in the City and those who worked in the Square Mile in order to get a true picture of the needs and concerns of people who use transport within the City of London

The City of London were able to provide access to key members of housing associations in the area who assisted in the recruitment process by helping us to contact residents in target areas

Participants were recruited to attend each of the three sessions and were paid for their time

	Gender	Social Grade	Location
20 X City Workers - Range of types – not just financial workers but those working in the retail, legal, insurance and servicing industries - Also range of levels, not just city professionals	50/50 Gender split	ABC1 and C2DE	City workers within the Square Mile
20 X City Residents (private and social housing) Including mix from the following areas: - Middlesex Street Housing Estate - Golden Lane Housing Estate - Barbican Area - Elsewhere in City	50/50 Gender split	ABC1 and C2DE	Residents within the Square Mile

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Overall observations on process and findings

- Ultimately all of our participants had positive reactions to the final versions of the Strategy presented to them in the third session and were particularly motivated by the idea that the City of London would be a place where they could spend time and feel safe and secure
- For the most part residents' and workers' concerns and issues were fully reflected in the draft proposals; moreover they were generally in agreement with each other about the priorities and plans (the main factor that polarised people's outlook was whether they were themselves a cyclist or empathised with cyclists on the road)
- The proposals that they felt should have less priority were mostly those that they found it hard to imagine working in the City of London such as use of new technologies and being able to provide for everyone in equal measure
- Respondents felt that these proposals (i.e. the ones they found harder to picture) needed to be communicated very clearly and that there should be an element of education within this
- They also felt it was important for any communication to be 'jargon free' and consumer friendly – for instance there was considerable confusion over what a 'Legible London' sign was, what a 'resilience network' was etc.
- However the experience was a positive one for participants with the majority of their needs and issues listened to and reflected in the Strategy

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Session 1

20th March 2018

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Our aim was to explore and understand residents' and workers' priorities, current frustrations, concerns and aspirations when navigating the City transport and streets

Session One Approach

In order to generate robust and consumer led insight that could help to form the Transport Strategy , we developed a ‘ground up’ approach

It was important to make sure that the first session enabled residents and workers to have an unprompted discussion about the issues that mattered to them the most when thinking about navigating the City of London

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We then used their ideas and opinions as the basis for further discussion as a group and through this process were able to filter down to the core of each idea and discover residents’/workers’ needs and motivations

The City of London were then able to incorporate these insights into the foundation of the Transport Strategy



Stimulus used

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Road narrowed due to construction



Rubbish blocking the pavements

Photographs provided
by respondents



Pavement narrowed due to scaffolding and
cyclists

For our first workshop we asked participants to send in photos that illustrated issues and observations they experienced whilst traveling around the City

We then used these as living stimulus in the first workshop by displaying them on the walls in the session and asking people to make a list of the top 3 pictures/issues that they felt they could relate to when navigating the City streets

We designed a series of tasks that allowed respondents to discuss their issue freely and build workable solutions together

Identifying Issues Task

AIM: To find out what the issues are for residents and workers when it comes to navigating the City transport and streets

Issues Deep Dive Task

AIM: To explore in specific detail the issues residents and workers have when it comes to navigating the City transport and streets

Prioritisation Task #1

AIM: To get a feel for identifying what is most important in the future when navigating the City streets

Prioritisation Task #2

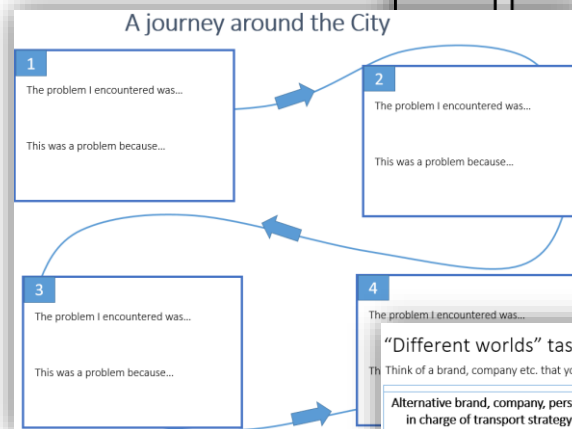
AIM: To get a further feel for prioritising what is most important in the future when navigating the City

Future Vision

AIM: To wrap up the session with a glimpse of the sorts of solutions that people would like to see in the plan

TOP 10 LIST
Issues that you encounter when you are travelling around the City at street level only – i.e. no tubes or trains

1 TITLE	2 TITLE	3 TITLE	4 TITLE	5 TITLE
DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION
6 TITLE	7 TITLE	8 TITLE	9 TITLE	10 TITLE
DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION



“Different worlds” task
Think of a brand, company etc. that you admire and is well known for radical solutions/positively disrupting markets

Alternative brand, company, person in charge of transport strategy	Characteristics

Ideas: Describe in detail how they would approach solutions to the main transport issues identified in the future, what they would do and why/how it would benefit people who live and work in the City.

“Break the Rules” task
Imagine all the “rules” of easy, safe travel around the streets of the City, particularly in relation to the problems you have been given to address. List them, then break them.

Rules	Broken Rules

Ideas: from the broken rules see if you come up with inspiration for different solutions to the original problem. Remember don't just “Un-break” the rule, use the broken rule as a jumping off point for a new solution

These were the key issues and emerging needs identified by participants

Issues common to both audiences

- Competition for naturally limited space and resulting pavement congestion
- Poor pavement and street quality leading to unsafe conditions for pedestrians and cyclists in particular
- Poor environment and maintenance of that environment resulting in poor air quality and dirty/litter strewn spaces
- Pressure of development and economic activity with construction and HGV traffic causing congestion, disruption and unsafe conditions for pedestrians
- Behaviour of street and pavement users making getting around the City slow and frustrating

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Additional Issues Specific to Residents

- Accessibility for disabled pavement users and parents with buggies
- Pedestrian safety on streets as a result of inadequate crossings, pavement congestion and traffic speed

Needs common to both audiences

- Pavement congestion (people and space)
- Maintenance of pavement and street surfaces
- Specific measures to improve accessibility and mobility
- Improvement of pedestrian crossing provision
- Air quality
- Appearance and tidiness of pavements (e.g. bins/collections)
- Improved or mitigated arrangements around construction
- HGV restrictions
- Measures to educate or improve all users' behaviour (traffic calming, mobile phone awareness)

Participants developed the issues and needs in more detail

Competition for Limited Street Space

- The theme of pavement congestion caused by too many people in too small a space was a constant theme for both workers and residents
- This is felt to be a general state when most people are using the streets
- But it can also be exacerbated:
 - At busy times
 - When construction causes pavements to be narrowed/closed
 - At pinch points like crossings
 - When people behave badly or frustratingly
 - In presence of tourists
 - Negotiating obstacles – from litter to HGVs

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Poor Pavement (& Street) Quality

- **Pavement** quality is an issue for everyone
 - It is an aesthetic issue – makes the streets scruffy and uninviting
 - But it is mainly a functional problem
 - Uneven surfaces make it harder and slower to move around the streets
 - There is more danger from tripping etc.
 - Not surprisingly this is most pressing for people who need a smooth surface – people with mobility problems (with or without scooters), parents with buggies, wheelchair users etc.
- **Street** quality is mainly an issue for cyclists and drivers (although driving around the City tended to be the least discussed problem in an area where there is relatively little private car use)
 - Potholes were mentioned as a hazard for all street users

Participants developed the issues and needs in more detail

Poor environment and maintenance of that environment

- The main issues that both audiences raised when it came to the general “environment” of the City were air quality and rubbish on the streets
 - **Air quality** is a problem from a day-to-day experience perspective (unpleasant)
 - And also from a health perspective (people worry about long term health effects)
 - It is caused, they feel, by vehicles (cars, vans, lorries, buses) and by construction (dust) and exacerbated by the physical nature of the streets – narrow, enclosed etc.
 - They felt that this negatively impacted on their experience of travelling around the City streets
 - **Rubbish** on the streets was also aesthetic (it looks scruffy and does not invite use of the streets) and functional (it blocks narrow streets and makes it difficult to navigate and dangerous (e.g. need to step into the street))

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Pressure of development and economic activity

- Everyone is aware of development in the City
- They all know that the City is a place of growing activity
- And that this growth is contained within a finite space
- Workers and residents feel that this causes problems and tensions
- Residents can feel that they have to live with and amongst the consequences of development, whilst workers (admit they) can escape
- The key issues relate to those already set out:
 - Disruption of development with poor planning and alternative arrangements
 - Pollution from dust and increased traffic
 - More people means more congestion
 - More business means more rubbish blocking the streets etc.

Participants developed the issues and needs in more detail

Pedestrian Safety on streets (residents only)

- Residents were more likely than City workers to worry about their safety
 - This could be because they use the streets more often and go to more places than people who work in the area
- The issues which affect safety include:
- Having to step into the street to avoid obstacles on the pavement (people, rubbish etc.)
 - Construction narrowing pavements making them less safe
 - Not enough pedestrian crossings
 - Potholes being dangerous for cyclists
- There was also some mention of security in relation to terrorist attacks – because the streets are congested and difficult to navigate this could make it more difficult to escape from a terrorist attack

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Behaviour of street and pavement users

- The behaviour of “other” people was often cited by our panellists
- There were differences between the views of people on, for example, cyclists
- However people felt that inconsiderate drivers could be a danger to pedestrians, poor HGV parking blocking crossings or street junctions, wandering pedestrians on mobile phones, groups of tourists etc. all make the task of navigating the already crowded City streets more difficult and frustrating

Accessibility (residents only)

- Accessibility, especially for people with mobility problems, can be an issue
- This is related to all the “congested pavement” problems but also related to a perceived lack of dropped kerbs
- This issue also affects parents with buggies who say they have difficulty crossing streets comfortably and safely
- Even those who do not personally experience mobility difficulties are aware of those around them having difficulty and feel that the streets fail to pass muster in this regard

Session 2

13th June 2018

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Our aim was to present the first iteration of the developed vision, aims and outcomes and to gain feedback from residents and workers

Session Two Approach

The City of London took the insights from session one and were able to incorporate these learnings when formulating policy areas

The City of London ultimately gave us 10 key outcomes to be further investigated

In our second session we presented these 10 outcomes to respondents and had them complete a variety of tasks in order to validate and refine each point



Stimulus used

Below are the 10 outcomes that residents and workers were asked to work with in a number of different ways;

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1. The Square Mile is a great place to walk and spend time
2. Our streets are accessible to all
3. People using our streets and public spaces are safe and feel safe
4. People enjoy a relaxed cycling experience in the Square Mile
5. The Square Mile is cleaner and quieter
6. Delivery and servicing needs are met in ways that benefit the Square Mile
7. Street space is used more fairly and effectively
8. Our street network is resilient to changing circumstances
9. The Square Mile benefits from better transport connections
10. Emerging transport technologies benefit the Square Mile

We designed tasks that would lead respondents through a detailed process of validation and refinement

Validate list Task #1

AIM: To validate the list of 10 Transport Strategy Outcomes by finding out if the list is right for residents and workers. To also find out if anything is missing from the list

Define outcomes Task #2

AIM: To refine each of the specific 10 Transport Strategy Outcomes. Explore in specific detail if each outcome is appropriate and if it needs to be refined

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Outcome detail task #1

AIM: To explore each of the specific 10 Transport Strategy Outcomes in detail to test the proposed dimensions and refine if needed and to understand the specific actions and 'how' each of the 10 Transport Strategy Outcomes work in practice

VOTING BALLOT (ANONYMOUS)

Worker Resident

I LIKE THE TRANSPORT VISION

Place an X in the box

I DISLIKE THE TRANSPORT VISION

Place an X in the box

PLEASE EXPLAIN WHY :

Validate List Task
As a group put a smiley face or sad face next to each outcome to decide if it is relevant
Overall please decide as a group if you think anything is missing

	RELEVANT?	WHAT IS MISSING?
1. The Square Mile is a great place to walk and spend time		
2. Our streets are accessible to all		
3. People using our streets and public spaces are safe and feel safe		
4. People enjoy a relaxed cycling experience in the Square Mile		
5. The Square Mile is cleaner and quieter		
6. Delivery and servicing needs are met in ways that benefit the Square Mile		
7. Street space is used more fairly and effectively		
8. Our street network is resilient to changing circumstances		
9. The Square Mile benefits from better transport connections		
10. Emerging transport technologies benefit the Square Mile		

Outcome detail Task
For each outcome fill in the second column: what does this mean to you?

	WHAT DOES THIS MEAN TO YOU	DETAIL
1. The Square Mile is a great place to walk and spend time		<ul style="list-style-type: none"> People will view the City of London's street and public spaces as great places to walk and spend time. People walking will have their needs prioritised. The experience of walking and spending time on our streets will be improved through investment in high quality public realm, street greening and motor traffic reduction.
2. Our streets are accessible to all		<ul style="list-style-type: none"> People of all ages and abilities will be able to travel easily around the Square Mile. Barriers to walking, cycling and travelling by public transport will be removed. Appropriate vehicle access will be provided for those that need it
3. People using our streets and public spaces are safe and feel safe		<ul style="list-style-type: none"> Everyone will feel safe when travelling around the Square Mile. We will continually strive to reduce road danger and eliminate traffic related death and serious injury (Vision Zero). Proportionate security measures will be sensitively incorporated into buildings and the streetscape while enhancing the public realm
4. People enjoy a relaxed cycling experience in the Square Mile		<ul style="list-style-type: none"> A more diverse range of people will choose to cycle. The design and management of streets will enable cycling at a pace that suits the City and make cycling a relaxing and enjoyable way to travel.
5. The Square Mile is cleaner and quieter		<ul style="list-style-type: none"> Carbon emissions and people's exposure to air and noise pollution will be reduced. There will be fewer motor vehicles and those that remain will be smaller, lighter and zero emissions.

In general, people were positive about the proposed vision and aims

We asked the panel to take part in a voting task to find out if they liked or disliked the transport vision

The majority liked the transport vision:

- Inclusive to benefit all: workers, residents, visitors, pedestrians and cyclists
- Highlights congestion of roads which is a top issue
- Safety is important esp. for cyclists and pedestrians
- Stresses the desire for the area to be easier to navigate and nicer to walk around
- Indicates the need for a cleaner Square Mile
- Invokes ideas for places to sit and rest - a central hub where the City is “the place to go”
- Feels like a transformative and exciting vision, one that is organised and effective
- Feels very actionable

A small minority had questions and further requirements:

- Traffic congestion is not fully addressed
- Expectations include increased focus on expanding street space/ area and improvements of the roads in the city

City of London Transport Strategy Draft vision, aims and outcomes, May 2018	
Our vision	The Square Mile enjoys world-class connections and streets that inspire and delight.
By delivering this vision we aim to ...	<ul style="list-style-type: none">• Ensure the Square Mile is accessible to all and an easy, attractive and healthy place to work, live, learn and visit.• Support the development of the Square Mile as a vibrant global commercial centre and cultural destination.
To create a future where ...	<ul style="list-style-type: none">• The Square Mile is a great place to walk and spend time• Our streets are accessible to all• People using our streets and public spaces are safe and feel safe• People enjoy a relaxed cycling experience in the Square Mile• The Square Mile is cleaner and quieter• Delivery and servicing needs are met in ways that benefit the Square Mile• Street space is used more fairly and effectively• Our street network is resilient to changing circumstances• The Square Mile benefits from better transport connections• Emerging transport technologies benefit the Square Mile
All of the above will be enabled by ...	Significant reductions in the number of motor vehicles using the Square Mile's streets

Participants proposed refinements to the outcomes

When explored in detail, each of the 10 outcomes was deemed appropriate. Slight refinements by the panel were made around accessibility for all, safety, delivery and emerging transport technologies

Strategy Outcomes that were refined	Additions/ Tweaks to statements
The Square Mile is a great place to walk and spend time	<ul style="list-style-type: none"> This includes being a great place to: work and live, travel, socialise, drive , cycle and enjoy the facilities
Our streets are accessible to all	<ul style="list-style-type: none"> Which includes cars, bikes, disabled people, buggies
People using our streets and public spaces are safe and feel safe	<ul style="list-style-type: none"> Safe from accidents, including cycling collisions Safe because of higher police visibility and lighting
Delivery and servicing needs are met in ways that benefit the Square Mile	<ul style="list-style-type: none"> By using the latest technology (e.g. increased Amazon lockers) to reduce delivery vans
Street space is used fairly and effectively	<ul style="list-style-type: none"> Through increased cycle lanes and pedestrian zones
Emerging transport technologies benefit the Square Mile	<ul style="list-style-type: none"> Through electric vehicles and dedicated lanes for eco friendly vehicles

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Outcomes were then “built” by participants into specific solutions

The panel was then asked to brainstorm ideas on how each of the outcomes would work in real life

Strategy Outcome	How they envision this working in real life
1. The Square Mile is a great place to walk and spend time	<ul style="list-style-type: none"> • Designated walking areas/ skyline walkways • Increased green space, seating, play areas • Hybrid/ no car zones, low emission zones
2. Our streets are accessible to all	<ul style="list-style-type: none"> • Increased wheelchair / disability access including ramps and smoother pavements • Clearer signage for accessibility routes
3. People using our streets and public spaces are safe and feel safe	<ul style="list-style-type: none"> • More police security, CCTV & lighting • Increased pedestrian crossings • Bollards designed as tree planters to reduce the perceived threat of terrorism
4. People enjoy a relaxed cycling experience in the Square Mile	<ul style="list-style-type: none"> • Dedicated wider cycle lanes & mending potholes • Apply bells to all cyclists so pedestrians can hear them
5. The Square Mile is cleaner and quieter	<ul style="list-style-type: none"> • Increase electric vehicle & charging points • Promote car leasing / borrowing • Encourage cycling • Impose car taxes to drive through the Square Mile

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Outcomes were then “built” by participants into specific solutions

Strategy Outcome	How they envision this working in real life
6. Delivery and servicing needs are met in ways that benefit the Square Mile	<ul style="list-style-type: none">• Encourage drone delivery to reduce congestion• Increase local supermarkets to encourage shopping locally• Encourage time slot deliveries (late night/ early morning) to reduce congestion
7. Street space is used fairly and effectively	<ul style="list-style-type: none">• More bollards to stop bars monopolising pavements• One way streets/ time slots for usage• Skyline walkways
8. Our street network is resilient to changing circumstances	<ul style="list-style-type: none">• Communication about planned works (apps, newsletters)• Improved maintenance (drains, snowploughs)
9. The Square Mile benefits from better transport connections	<ul style="list-style-type: none">• More signposting detailing transport connections, including voice signage• Sensory trails for visual/ hearing impaired
10. Emerging technologies benefit the Square Mile	<ul style="list-style-type: none">• Reliable apps to inform about transport delays• Drop off points for delivery vans that reduce traffic

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Session 3

6th September 2018

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The key focus of the final workshop was on reviewing and evaluating the draft proposals and then exploring and understanding the best ways to communicate them

Session Three Approach

After gaining important feedback from the panel on various aspects of the Transport Strategy in Session 2, the City of London was then able to produce a draft of the proposals delivering each outcome

The key focus of this final workshop was to get the panel to review and evaluate the draft proposals and also to capture the panel's response to these

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As with previous sessions it was essential to make sure that residents and workers were able to have unprompted discussions about the issues when thinking about navigating the City of London

Therefore we asked the panel to undertake creative tasks to aid them when reviewing the proposed policies and to also understand the best ways to communicate these policies to the public



Stimulus used

The draft proposals were summarised under the 10 outcomes

1. The City's streets are great places to walk and spend time
2. The City is accessible to people of all abilities
3. People using our streets and public spaces are safe and feel safe
4. A more diverse range of people choose to cycle
5. The City's transport and streets are cleaner and quieter
6. Delivery and servicing needs are met more efficiently, and impacts are minimized
7. Street space is used more efficiently and effectively
8. Our street network is resilient to changing circumstances
9. The Square Mile benefits from better transport connections
10. Emerging transport technologies benefit the Square Mile

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

- Redesign streets to reduce the likelihood and severity of collisions
- Maintain a smooth and level surface on pavements and carriageways to reduce the risk of trips and falls
- Reduce traffic speeds in the City by adopting a City-wide 15mph speed limit
- Enforce against dangerous and reckless driving and riding and run campaigns to encourage safe driving and riding
- Work with the City of London Police to reduce crime and fear of crime, including reviewing CCTV coverage
- Ensure that anti-terrorism security measures are:
 - Discreet and installed to avoid reducing the space available to people walking and cycling
 - Multi-functional, incorporating seating, greenery or public art where possible
 - Designed and installed to take account of the access needs of people with disabilities and servicing
- Improve the quality of street lighting to improve safety and reduce crime

Delivery and servicing needs are met more efficiently, and impacts are minimised

- Reduce the number of freight vehicles in the Square Mile through:
 - Consolidation (grouping deliveries into fewer vehicles at a central depot outside the City)
 - Enabling more deliveries to be made by cargo cycles, on foot and by small electric vehicles
 - Increasing the use of the River Thames for freight
 - Retiming deliveries to avoid peak travel times and to overnight in areas where residents won't be affected
 - Reducing the impact of construction freight
- Identify opportunities to reduce the number of vans and other service vehicles

The City's streets are great places to walk and spend time

- Consider the needs of people walking first when delivering changes to streets
- Increase the number of pedestrian priority streets – where vehicles give way to people walking and access may be restricted
- Make streets easier to cross and give people on foot priority at the entrances to side streets
- Widen pavements to provide more space for people walking
- Improve wayfinding and signage by installing Legible London
- Enhance the Barbican high walks and ensure public lifts across the City are well maintained
- Increase the amount of seating on-street and in squares, public spaces and parks.
- Improve the public realm, particularly in areas where there are buildings of significant historical and architectural importance
- Incorporate more greenery into the City's streets and public spaces

We produced a series of creative exercises to keep the panel engaged and to help elicit deeper insights and ideas that they may have otherwise struggled to imagine or communicate

Validating Exercise

AIM: To validate the Transport Strategy proposals by finding out first impressions of the proposals or both residents and workers

Refinement Exercises

AIM: To find out the positives and negatives of each proposal. In addition to find out if anything was missing from each policy


Communication Exercise

AIM: To understand the best ways to communicate the proposal to the public

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Task Look at the policy in front of you and imagine what it would be like to experience this in real life. Write a postcard to yourself and describe this experience in detail and what it made you think or feel

Dear _____



2 tweaks you would make to the policy:

1 _____

2 _____

Text Task We would like you to imagine the policy in front of you is live and you are in the future experiencing it. Imagine you are texting a friend that knows nothing about the policy and then describe in detail what is happening and how you feel about it. Please come up with 4-5 texts to describe this.

1. _____

2. _____

3. _____

4. _____

5. _____

2 tweaks you would make to the policy:

1 _____

2 _____

Sentence Task In your pairs we would like you to look at the policy in front of you. Thinking about the policy complete the 4 sentences on the paper in front of you

One of the things that surprised me was....

I agree with....

I didn't really understand....

This makes me feel....

2 tweaks you would make to the policy:

1 _____

2 _____

In summary, the proposals were endorsed, with enjoyability, safety and accessibility being key

The majority of respondents were happy with the policies provided:

- This was true for both Residents and Workers

Their main priorities were:

- Page 341
- Ensuring there were areas where residents and workers alike could spend time
 - Ensuring that the area was and felt 'safe'

Areas that they saw as being less of a priority tended to be those that they:

- Could not fully comprehend – e.g. the use of droids
- Could not see working – e.g. making the City accessible for everyone whilst keeping the old features

The City's streets are great places to walk and spend time 1

- Consider the needs of people walking first when delivering changes to streets
- Increase the number of pedestrian priority streets – where vehicles give way to people walking and access may be restricted
- Make streets easier to cross and give people on foot priority at the entrances to side streets
- Widen pavements to provide more space for people walking
- Improve wayfinding and signage by installing Legible London
- Enhance the Barbican high walks and ensure public lifts across the City are well maintained
- Increase the amount of seating on-street and in squares, public spaces and parks.
- Improve the public realm, particularly in areas where there are buildings of significant historical and architectural importance
- Incorporate more greenery into the City's streets and public spaces

The City is accessible to people of all abilities 2

- Develop a City of London Street Accessibility Standard to set minimum and best practice standards
- Carry out a detailed accessibility audit using the Accessibility Standard of all streets to identify and deliver necessary improvements
- Ensure pavements are kept clear of obstructions
- Keep pedestrian crossings clear of vehicles
- Maintain vehicle access for those that need it, such as people with disabilities or heavy luggage
- Work with TfL and Network Rail to prioritise accessibility improvements to rail, Underground and DLR stations

People using our streets and public spaces are safe and feel safe 3

- Redesign streets to reduce the likelihood and severity of collisions
- Maintain a smooth and level surface on pavements and carriageways to reduce the risk of trips and falls
- Reduce traffic speeds in the City by adopting a City-wide 15mph speed limit
- Enforce against dangerous and reckless driving and riding and run campaigns to encourage safe driving and riding
- Work with the City of London Police to reduce crime and fear of crime, including reviewing CCTV coverage
- Ensure that anti-terrorism security measures are:
 - Discreet and installed to avoid reducing the space available to people walking and cycling
 - Multi-functional, incorporating seating, greenery or public art where possible
 - Designed and installed to take account of the access needs of people with disabilities and servicing
- Improve the quality of street lighting to improve safety and reduce crime

Proposals that the panel were highly engaged with

- **City streets where you can walk and spend time** was an extremely positive policy for all:
 - Incorporation of greenery creates a relaxed environment to walk around and increases dwell time
 - Prioritizing both pedestrian and cyclist safety makes workers & residents feel acknowledged and heard
- **Safety** is collectively agreed to be a priority and extremely important to both residents and workers:
 - It is positive that a wide variety of appropriate measures are being taken to ensure public safety including crime prevention
 - “People” are prioritised in the main headline which is inclusive of all and reassuring
- **More efficient delivery and servicing needs** is also thought to be very optimistic:
 - Using the River Thames for freight reduces road congestion – as an underused resource this is identified as a very positive strategy
 - Increase of small electric vehicles reduces noise and pollution
- **Improved transport connections** delighted workers and residents:
 - Agreed to be very positive in regards to expansion of trains, buses and tubes – esp. for workers who commute and residents who want to travel late at night/ on weekends
 - Expansion of train/ bus/ tubes and train station improvements means increased convenience

Proposals that the panel were moderately engaged with

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- **The City's transport and streets are cleaner and quieter** was agreed to be a satisfactory policy:
 - The Zero Emission Zone prioritises the health of the people in the City
 - Efforts to reduce noise, pollution and litter were welcomed and received positively
 - Clean and litter free cycle and walking routes and public spaces encourages people to use these on a regular basis
 - But electric Vehicles are perceived to be expensive to buy and maintain – there is low awareness about EVs in general

Street space is used more efficiently and effectively was acceptable:

- Street allocation is encouraging especially for cyclists
- Timed traffic at Bank and street closures encourages both safety and usability for all audiences
- Prioritising walking, cycling and buses will make the streets safer, especially for pedestrians
- But the Street Hierarchy is confusing and needs to be explained in a clearer way

Proposals that the panel saw as being less of a priority or harder to implement

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- **The City is accessible to people of all abilities**
 - Mostly deemed to be valuable as accessibility for all seems inclusive – esp. those with disabilities of mobility issues
 - But some had concern about how pedestrian crossings and pavements could be kept clear in practice
- **A more diverse range of people choose to cycle**
 - A mix of positive feedback as cyclists appreciate the increased cycle parking and being prioritised in the policy
 - But there were some negative comments as some non cyclists, drivers and pedestrians feel shared spaces won't work and more education needs to be given to cyclists about obeying the highway code
- **Our street network is resilient to changing circumstances**
 - Keeping transport flowing in different circumstances creates flexibility and convenience and reducing street works and rainwater run off is beneficial
 - Although issues were raised on how this would be achieved, as design to protect streets from all weather didn't seem realistic. Nor did streets & networks remaining open during severe weather
- **Emerging transport technologies benefit the Square Mile**
 - Reduction of vehicle volume and vehicle demand tackles congestion and supporting walking & cycling and targeting air pollution is important to most
 - But there is confusion on how droids can be used on streets/ how drones will be monitored

The Ideal Advertising Campaign

We tasked our panel with a creative exercise to design a piece of advertising which best communicated the ideal platform and the main focus of the campaign to the public

It was agreed the campaign focus should be: Health (reducing air pollution), Reducing Congestion, Improved Safety (for pedestrians, cyclists, drivers), Clean Green Spaces that “make people relaxed and feel good”, and Accessibility for everyone

Page 345 suggested platforms included creative ideas such as:

- Interactive billboards
- Social media via current artists from the City
- Social media showing before/after videos of the changes (e.g. cyclists, pedestrians, those with disabilities and mobility issues)
- Podcasts featuring discussions with workers/residents affected by the issues
- Text messages to mobiles
- TV campaigns to target workers in the evening
- Mailshots to residents
- Volunteer “helpers” around the City to inform people of changes (similar to Olympic Game helpers)
- Incentives of free coffee identified on touchpoint maps for every 1000 steps to encourage exploring the City
- Famous residents using social media links to highlight the areas in the City and to introduce the corresponding policies

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City Streets: Transport for a changing Square Mile

City of London Transport Strategy Draft for Consultation

November 2018

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Chairman's foreword

DRAFT

Have your say

1. We would like to hear your views on this draft of the City of London Transport Strategy. Comments and feedback will be used to inform the final version of the Transport Strategy, which is due to be published in spring 2019.
2. The consultation on the draft Transport Strategy will run from 12 November 2018 to 14 January 2019.
3. You can provide feedback and indicate your level of support for the proposals by visiting [\[insert consultation website URL\]](#)
4. Alternatively, you can write to strategic.transportation@cityoflondon.gov.uk or Strategic Transportation, City of London Corporation, PO Box 270, London, EC2P 2EJ.
5. Hard copies of this document can be requested by emailing us at the above address or calling 020 7606 3030.
6. Several drop-in sessions will be held at City libraries and in the reception area of the Guildhall throughout November, December and January. These will provide an opportunity to discuss the Transport Strategy with members of the City Corporation's Strategic Transportation team. Please see our website for details www.cityoflondon.gov.uk/transportstrategy
7. The City of London is also currently consulting on the draft Local Plan, City Plan 2036. This sets out the vision, strategy and objectives for planning and development over the next 20 years. Please visit www.cityoflondon.gov.uk/cityplan2036 for more details.

Introduction

8. The City of London, also known as the Square Mile, is the historic heart of London and one of the world's leading financial centres. It is home to 8,000 residents and a working population of over 480,000 people. Each year the City also welcomes over 10 million tourists, in addition to those visiting for business.
9. How people and goods travel to and around the City has a significant impact on the experience of living, working and studying in or visiting the Square Mile. Facilitating the safe, clean and efficient movement of people and vehicles serving the City, alongside improving the quality of streets and public spaces, will be essential to ensuring the continued success of the City as a global centre for business and cultural destination.
10. As the highway authority for the Square Mile, the City of London Corporation (City Corporation) is responsible for the management of most streets within the City. Transport for London (TfL), the integrated transport authority for Greater London, manages the Transport for London Road Network (TLRN, also known as 'Red Routes'), of which there are several miles within the Square Mile. TfL also manages and operates London's public transport, the Congestion Charge and Emission Zones.



Figure 1: Map of the City of London boundary and the Transport for London Road Network (TfL road network)

11. This Transport Strategy provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion. It also sets out our aspirations for improvements to the TLRN and local, national and international transport connections. It details an ambitious approach to transport and the design and management of streets in response to the challenges arising from significant growth, fast-moving technological development and changing travel habits.
12. The Square Mile's workforce is forecast to increase to 570,000 by 2030 and to over 620,000 by 2044. The residential population will also grow, with nearly 3,000 more people living in the Square Mile by 2044. This growth will lead to more people travelling on the City's streets, and in particular more people walking, and increased demand for high quality public spaces. More residents, workers and visitors will also mean more deliveries and servicing of offices, homes, shops, pubs, cafes and restaurants.
13. This extra demand must be accommodated within a fixed amount of street space. The Square Mile's streets must enable the movement of people and vehicles to and through the City while also providing space for parking and loading. Our streets are also public spaces that provide workers, residents and visitors with places to meet, eat and drink, or just appreciate the unique character of the Square Mile. Attractive and safe public spaces, with seating and things to see and do are a vital ingredient of a modern city.
14. The next 25 years will see major changes in transport technology. Vehicles will increasingly be connected and automated, and new mobility services will emerge. New technology can present great opportunities for travel and transport, but also presents challenges over how these new advancements are managed and controlled. Automated vehicles, for example, may be able to use street space more efficiently and reduce collisions, but the availability of relatively cheap private transport could lead to more people choosing not to use public transport.
15. As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer. Fortunately, most people already travel to and around the Square Mile on foot, by cycle or public transport. These travel trends are likely to continue in the future, but only if walking, cycling and using public transport are convenient, attractive and safe ways to travel.

Travel and transport in the Square Mile

16. The City is one of the best-connected places in the world. TfL rates the whole of the Square Mile as having a Public Transport Accessibility rating of above 6 – the highest possible score. This is made possible by an extensive public transport network with six mainline railway stations, 12 Underground and DLR stations and a high density and frequency of bus services. Large numbers of commuters also use stations near the City, including London Bridge and Waterloo. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City. Significant improvements have and are being made to public transport provision, particularly with the construction of the Elizabeth line which will operate trains to the City at Farringdon and Liverpool Street/Moorgate from autumn 2019.

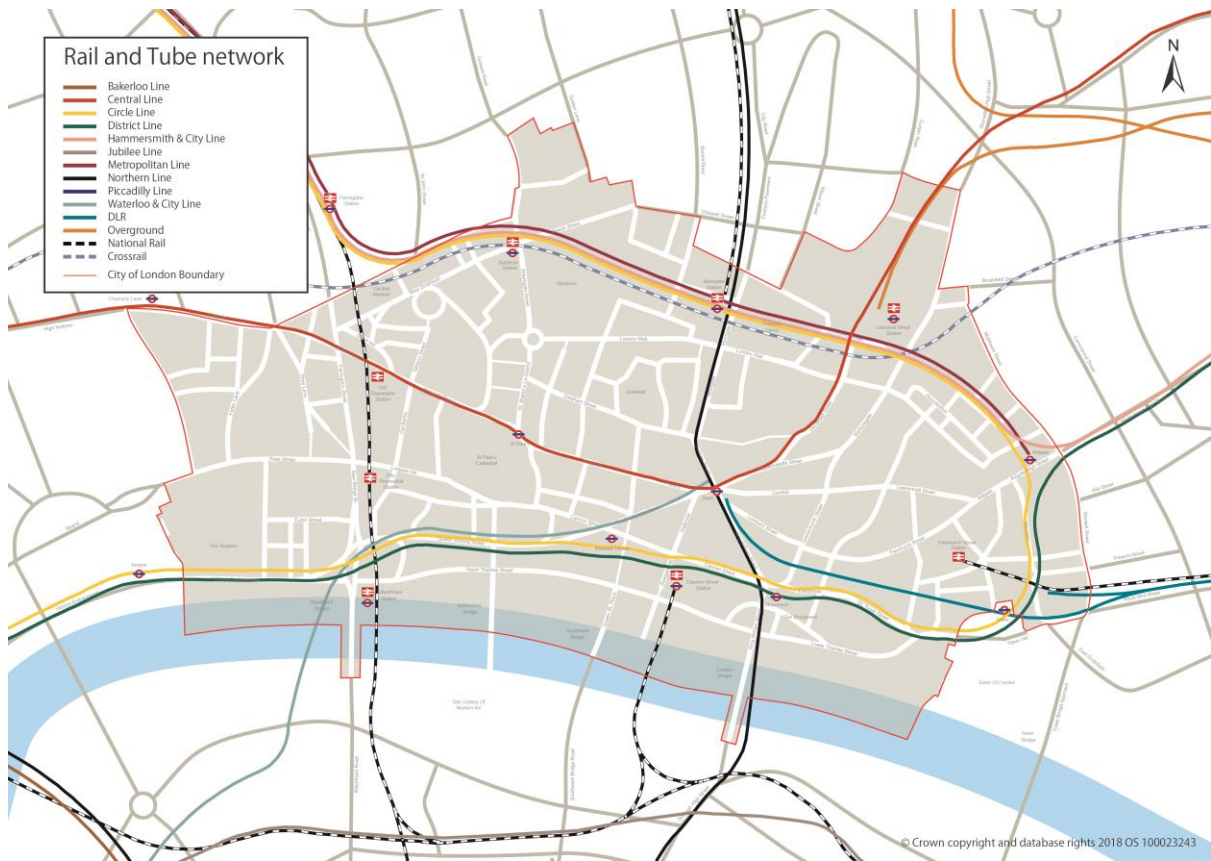


Figure 2: City of London rail, Underground, and DLR networks

17. 93% of commuter travel to the Square Mile is by public transport (84%), walking (5%) or cycling (4%)ⁱ. Fewer than 5% of City workers drive to work. Walking is by far the main mode of travel within the City, with over 750,000 walked journeys a day. In recent years investment in cycling infrastructure has resulted in an estimated tripling in the number of people cycling in the Square Mile. People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during rush hourⁱⁱ.

93%

of commuter travel to the City is by



Public transport (84%)



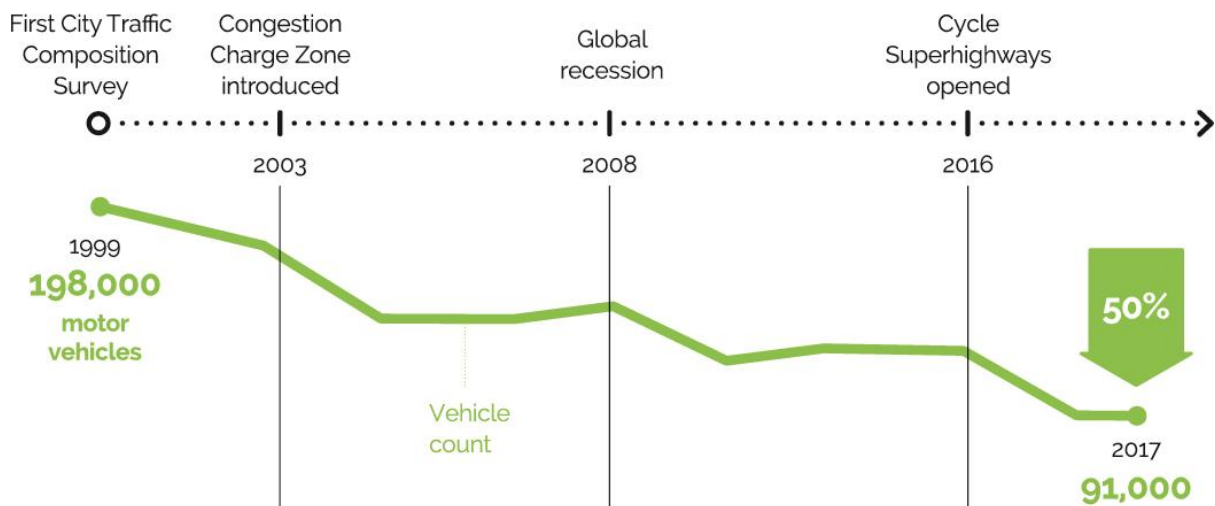
walking (5%)



Cycling (4%)

18. Traffic in the City has changed significantly since the late 1990s, both in terms of total volume and overall composition. Traffic counts across the City show that overall motor traffic volumes have reduced by approximately 50%, with the greatest reduction being in the number of cars and taxis. The greatest observed reductions have coincided with key events such as the introduction of the Congestion Charge, the global recession and the introduction of Cycle Superhighways. ⁱⁱⁱ

How motor vehicle volumes have changed across the City since 1999



19. The most recent traffic counts in autumn 2017 found a slight increase in car volumes, probably caused by the increasing volumes of private hire vehicles. Freight volumes, after dropping significantly between 1999 and 2004, have levelled off in recent years^{iv}.

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How the Square Mile's streets have changed over the last 25 years

In common with cities around the world, the focus of transport planning and traffic management in Square Mile during the 1960s, 70s and 80s was accommodating motor vehicles. Streets such as London Wall, Upper and Lower Thames Street and the Aldgate gyratory were rebuilt to maximise the flow of motor traffic. People walking were expected to cross these streets via bridges and subways. A thirty-mile network of walkways was planned, but never completed. Very few junctions had pedestrian crossings and pavement widths were kept to a minimum.

This approach began to change in the early 1990s, when the City Corporation approved an experiment to close Bank Junction to through movement and to retime traffic signals throughout the Square Mile. Twenty-five years later these aspirations are beginning to be realised with the Bank on Safety project, which restricts access to general motor traffic during the day. The proposals for Bank were part of a wider plan, 'Key to the future', which sought to reduce motor traffic in the centre of the City. These proposals took on an extra urgency following the IRA bombings of the Baltic Exchange and Bishopsgate in 1992 and 1993, leading to the introduction of a temporary 'Ring of Steel' in July 1993.

Officially known as the 'Traffic and Environment Zone', the Ring of Steel was made permanent in 1994. It significantly reduced the number of places where motor vehicles could enter the City, with many smaller streets closed to through traffic. This, together with carriageway narrowing and the installation of check points at the remaining access points, meant that fewer motor vehicles could enter the City. Motor traffic in the centre of the Square Mile fell by 30% as a result. Associated changes made key junctions outside the Ring of Steel more efficient by cutting out some of the movements, for example the Southwark Bridge/Queen Street/Upper Thames Street junction.

The Ring of Steel was extended in 1996 to incorporate Saint Paul's and Old Bailey and in 2000 to include Broadgate and a slight extension into Hackney. A further extension in 2003 brought the west of the City into the traffic management zone. Other functional changes through the 1990s and early 2000s, saw pedestrian crossings added to 10 junctions and the installation of dropped kerbs and pedestrian refuges.

The last 15 years has seen an increased focus on improving the quality of the Square Mile's streets as places to walk, cycle and spend time. Overall, almost a third of the City's streets have been improved over this period. 99% of guard railing was removed through the 2000s and around 100 granite courtesy crossings installed at junctions. Two-way cycling began to be introduced on one-way streets in 2006, with over 100 streets made two-way for people cycling by 2015. In partnership with Transport for London, two Cycle Superhighways and a Quietway through the City have been completed. These have helped make cycling safer and allow more people to choose this increasingly popular mode of transport.

Starting in 2003, the Street Scene Challenge matched money generated from on-street parking and penalty charges to contributions from developers and occupiers - funding the delivery of multiple small schemes to improve the public realm across the Square Mile, such as Devonshire Square and Mitre Square. This collaborative approach has also funded significant improvements to:

- The area south of Saint Paul's, including converting the coach park into a new garden (completed 2011)
- The Cheapside quarter, including wider pavements to make Cheapside a more attractive place to shop and spend time (completed 2012)
- Holborn Circus, with more public space and seating and improved pedestrian crossings (completed 2014)
- The removal of the gyratory at Aldgate, which has enabled the creation of Aldgate Square – one of the largest public spaces in the Square Mile (completed 2018)
- Widening pavements, improving pedestrian and cycle crossings and creating new public spaces as part of the London Wall Place development (completed 2018)
- Public realm improvements around new offices for Bloomberg (completed 2018) and Goldman Sachs (due to complete in 2019)

Most recently, Bank on Safety, the experimental scheme to improve safety for people walking and cycling through Bank Junction, has been made permanent and plans for further improvements to the junction are now being prepared. This will be just one of the many large and small projects that will continue the transformation of the Square Mile's streets over the next 25-years.

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Understanding people's views of transport and streets in the Square Mile

20. The development of this Strategy has been informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile. The first phase of engagement, held in February and March 2018, included:

- **City Streets survey:** 1,949 people accessed this survey which included questions on perceptions of the City's streets, priorities for the use of streets and kerb-side space, and ideas and suggestions for future street and transport improvements.
- **City Streets exhibition:** A supporting exhibition was held at the City Centre on Basinghall Street. The exhibition took visitors through historic and recent changes to the City's streets and presented future challenges. More than 7,000 people visited the City Centre over the two-month period.
- **Stakeholder workshops:** 77 representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops in February and March 2018 to share their views on the transport challenges and opportunities.

21. The key themes emerging from this first phase of engagement were that:

- Motor traffic levels on the City's streets are too high
- People walking in the Square Mile are not given enough priority or space
- Conditions for cycling in the Square Mile need to be improved and made safer
- More greenery and seating should be provided on streets and the quality of the public realm improved
- Air quality in the Square Mile needs to be urgently improved
- There is potential to use streets more flexibly to accommodate the various demands on them at different times of the day
- The City's streets are not accessible to all
- The management of freight needs to be improved^v

22. A second phase of engagement, in June and July 2018, consulted on the proposed vision, aims and outcomes for this Strategy. Over 500 people and organisations responded to this consultation. The draft vision, aims and outcomes received high levels of support, with each being supported or supported with changes by between 77% and 92% of respondents^{vi}.

23. An independently recruited panel of City workers and residents also met three times during the development of the Strategy. This panel, which was facilitated by Populus, provided an opportunity to gain a deeper understanding of residents and workers' transport needs and concerns.

24. A Strategy Board made up of City business representatives, representatives from the Greater London Authority and TfL, and transport experts, also met three times during the development of the Strategy. This Board provided advice and acted as a sounding board for emerging proposals.

25. Reports of each phase of engagement, providing more details of feedback received, can be found on our website.

Supporting the delivery of the City of London Corporate Plan

26. The Transport Strategy is one of a suite of strategies that help to deliver the City of London Corporation's Corporate Plan. The Corporate Plan sets out the City Corporation's aims to:

- Contribute to a flourishing society
- Support a thriving economy
- Shape outstanding environments

27. The Transport Strategy will help contribute to a flourishing society by:

- Making streets safer and reducing the number of traffic related deaths and serious injuries
- Enabling people to walk and cycle and reducing the negative health impacts of transport
- Ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together

28. A thriving economy will be supported by:

- Enabling the City to continue to grow and accommodating the associated increase in demand for our limited street space
- Improving the quality of streets and transport connections to help attract talent and investment
- Helping create a smarter City, that supports and enables innovative transport technology and other mobility solutions

29. The Transport Strategy will help shape outstanding environments by:

- Advocating for improved local, national and international transport connections.
- Reducing motor traffic levels to enable space to be reallocated to walking, cycling, greenery and public spaces
- Improving air quality and reducing noise from motor traffic
- Ensuring streets are well maintained and resilient to natural and man-made threats

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Culture Mile

Culture Mile is a partnership between four UK leading arts, culture and learning institutions and the City Corporation to create a vibrant, cultural quarter. Stretching over just under a mile, from Farringdon to Moorgate, Culture Mile covers 15% of the total area of the Square Mile. Culture Mile incorporates the Barbican Centre and the new Museum for London and proposed Centre for Music. Several proposals in this Transport Strategy will directly support the delivery of Culture Mile by improving the public realm and enhancing walking and cycling routes to and within the area.

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Alignment with the City of London Local Plan

30. The new City of London Local Plan, called City Plan 2036, sets out the planning policies that will guide future growth and decisions on planning applications for the next 20 years.
31. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in City Plan 2036 and this Strategy are aligned. In particular, several proposals support and respond to the significant change anticipated in the following 'Key Areas of Change';
- **Aldgate and Tower:** major hotel and office developments are under construction on Minories, as well as the Chinese Embassy relocating to the area's vicinity and proposals for redevelopment of the Mansell Street estate
 - **Blackfriars:** public realm enhancements are proposed along the Riverside walk, and the development of the Thames Tideway Tunnel will create a large new public space
 - **City Cluster:** a number of significant tall buildings are under construction, with further tall buildings permitted but not yet commenced. Employment in the Cluster is expected to nearly double once all current permissions are built and occupied
 - **Fleet Street:** significant occupational change in major buildings is expected in the short to medium term as existing occupiers relocate to other buildings
 - **Pool of London:** several buildings are likely to be vacated in the short-term, providing an opportunity for redevelopment in the area
 - **Liverpool Street:** increased retail space at Broadgate, the completion of Crossrail at Liverpool Street station and linkages to Culture Mile will initiate change in this area
 - **Smithfield and Barbican:** the delivery of the Culture Mile initiative, relocation of Museum of London to Smithfield, the potential development of a new Centre for Music on the site of the existing Museum of London and the possible relocation of Smithfield Market will see this area undergo significant change

MAP OF KEY AREAS OF CHANGE

Supporting the delivery of the Mayor's Transport Strategy

32. The Mayor's Transport Strategy (MTS) sets out the Mayor of London's policies and proposals to reshape transport in London by transforming the Capital's streets, improving public transport and creating opportunities for new homes and jobs. To achieve this, the Mayor wants to encourage more people to walk, cycle and use public transport.
33. The three key themes of the MTS are:
- **Healthy Streets and healthy people:** Creating streets and street networks that encourage walking, cycling and public transport to reduce car dependency and the health problems it creates
 - **A good public transport experience:** Enabling more people to travel by public transport, the most efficient way for people to travel over distances that are too long to walk or cycle

- New homes and jobs: Planning the city around walking, cycling and public transport use to unlock growth in new areas and ensure that London grows in a way that benefits everyone
34. This Strategy, together with a separate LIP Delivery Plan, will form the City of London Corporation's Local Implementation Plan (LIP). The City Corporation, along with London's 32 boroughs, is required to produce a LIP that details how we will support the delivery of the MTS. Our draft LIP Delivery Plan is published alongside this draft Strategy and provides more details of the alignment between our visions, aims, outcomes and proposals and the MTS.

DRAFT

Vision, aims and outcomes

35. Our vision

Streets that inspire and delight, world-class connections and a Square Mile that is accessible to all.

36. By delivering this vision we aim to...

- Ensure the Square Mile is a healthy, attractive and easy place to live, work, learn and visit.
- Support the development of the Square Mile as a vibrant commercial centre and cultural destination.

37. To create a future where ...

- The Square Mile's streets are great places to walk and spend time
- Street space is used more efficiently and effectively
- The Square Mile is accessible to all
- People using our streets and public spaces are safe and feel safe
- More people choose to cycle
- The Square Mile's air and streets are cleaner and quieter
- Delivery and servicing are more efficient, and impacts are minimised
- Our street network is resilient to changing circumstances
- The Square Mile benefits from better transport connections
- Emerging transport technologies benefit the Square Mile

Proposals

38. For each of the 10 outcomes, this chapter outlines our ambitions, summarises the key issues and challenges and sets out proposals for delivery.

39. Where appropriate proposals include delivery timescales using the following milestones:

- 2022 (to align with the LIP Delivery Plan))
- 2025
- 2030
- 2040
- 2044 (the end date for this Strategy)

Healthy Streets Approach

40. The Healthy Streets Approach provides the framework for this Strategy. This means we will place improving people's health and their experience of using streets at the heart of our transport decision making.

41. The 10 Healthy Streets Indicators (Figure X) capture the elements that are essential for making streets better places to walk, cycle and spend time, and for supporting social and economic activity. All the proposals set out in this Strategy will contribute to the delivery of Healthy Streets.



Figure 3: Healthy Streets Indicators (Source: Lucy Saunders)

Proposal 1: Embed the Healthy Streets Approach in transport planning and delivery

42. We will ensure that the Healthy Streets Approach is embedded in our transport planning and the design and delivery of projects by:

- Using the Healthy Streets Approach to inform strategic decision making and project prioritisation
- Using the Healthy Streets Check for Designers to assess proposals for projects that will have a significant impact on people’s experience of using the City’s streets and publishing the results
- Assessing planning applications against the Healthy Streets Indicators and requiring the use of the Healthy Streets Check for Designers on all developments that will have a significant impact on surrounding streets
- Assessing the health impacts of projects as part of the design process and post-implementation monitoring
- Including questions relating to the Healthy Streets Indicators in project monitoring and public perceptions surveys

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Healthy Streets Check for Designers

TfL’s Healthy Streets Check for Designers is a tool that uses 31 metrics to assess how a street performs against the 10 Healthy Streets Indicators. It can be used to assess an existing street, proposed changes to a street or a completed project.

Using the Healthy Streets Check helps ensure that the factors that influence people’s experience of being on street are properly considered. It also allows easy comparison of different design options to help inform decision making and make it easier for people to understand the relative benefits of different proposals during consultations.

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The Square Mile's streets are great places to walk and spend time

43. Walking is, and will remain, the main way that people travel around the Square Mile. We want people walking in the City to feel that their needs have been prioritised. By delivering this Strategy we will make the experience of walking on our streets a more enjoyable and rewarding experience – a great way to travel and to discover all that the City has to offer. Fewer, cleaner and quieter motor vehicles will mean that streets are less dominated by traffic and easier to cross. People driving and riding in the City will recognise the Square Mile as a place where people on foot come first – they will travel slowly and be prepared to give way to people walking. Pavements will be wide enough to avoid feeling uncomfortably crowded, even during the hustle and bustle of the morning and evening commute. High quality public realm, more seating, greenery, public art and events will mean that streets are also great places to stop, rest and relax.
44. Today, only 10% of people rate the experience of walking in the Square Mile as pleasant^{vii}. Our ambition is that this will increase to 75% by 2044. The City's streets are busy with people walking at all times of the day, and between 7am and 11pm there are more people walking on our streets than travelling by any other mode^{viii}. 65% of all travel movements in the Square Mile are made on foot and almost all of the 8,000 residents and 480,000 workers in the City will walk at least once during the day^{ix}. These numbers will increase as the City grows, with potentially a further 125,000 people walking on our streets within the next 25 years^x. The completion of the Elizabeth line in 2019 will intensify the arrival of people into the City – with each Crossrail train capable of accommodating 1,500 passengers.
45. Nearly three quarters of respondents to our City Street's survey think that people walking should be prioritised first out of all street users^{xi}. However, almost two thirds of respondents feel that people on foot are currently under prioritised and four in five think that pavements are overcrowded at some point during the day^{xii}. Respondents also want a more pleasant and attractive street environment; when asked to suggest one change to improve the City's streets, the most frequent non-transport request was for more greenery^{xiii}.

Proposal 2: Put the needs of people walking first when designing and managing our streets.

46. We will ensure that the needs of people walking are prioritised by:
- Applying the Healthy Streets Approach (Proposal 1) and considering the needs of people walking first when delivering changes to streets
 - Accepting that delivering priority for people walking may result in delays or reduced capacity for other street users, while seeking to minimise the impact on essential traffic through general traffic reduction (Proposal 11)
 - Increasing the number of pedestrianised or pedestrian priority streets from 25 kilometres at present, to 35 kilometres by 2030, and aiming for at least 50% (by length) of streets to be pedestrian priority by 2044
 - Making streets easier to cross and giving people on foot greater priority at the entrances to side streets
 - Widening pavements to provide more space for people walking, with the aim that all pavements will have a minimum Pedestrian Comfort Level of B+

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Pedestrian Comfort Levels

Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions.

Transport for London's Pedestrian Comfort Guidance recommends a minimum comfort level of B+. This provides enough space for people to feel comfortable when walking at a typical pace and for them to be able to choose where to walk. Below this level, conflicts between people walking become frequent, walking is increasingly uncomfortable and frustrating and can lead to people stepping into the carriageway.

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Key walking routes

47. We will prioritise improvements to junctions and routes that are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 to make walking quicker, safer and more comfortable:

- The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank
- Bank Junction and streets between the junction and the City Cluster
- To support Culture Mile and coincide with the opening of the new Museum for London and proposed Centre for Music:
 - The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory
 - The route between the Barbican and the new Museum for London, including Beech Street and Long Lane
- Fleet Street, including potential further changes to Ludgate Circus (in partnership with TfL)
- The Bishopsgate corridor, including Monument junction (in partnership with TfL)
- The Globe View section of the Riverside Walkway

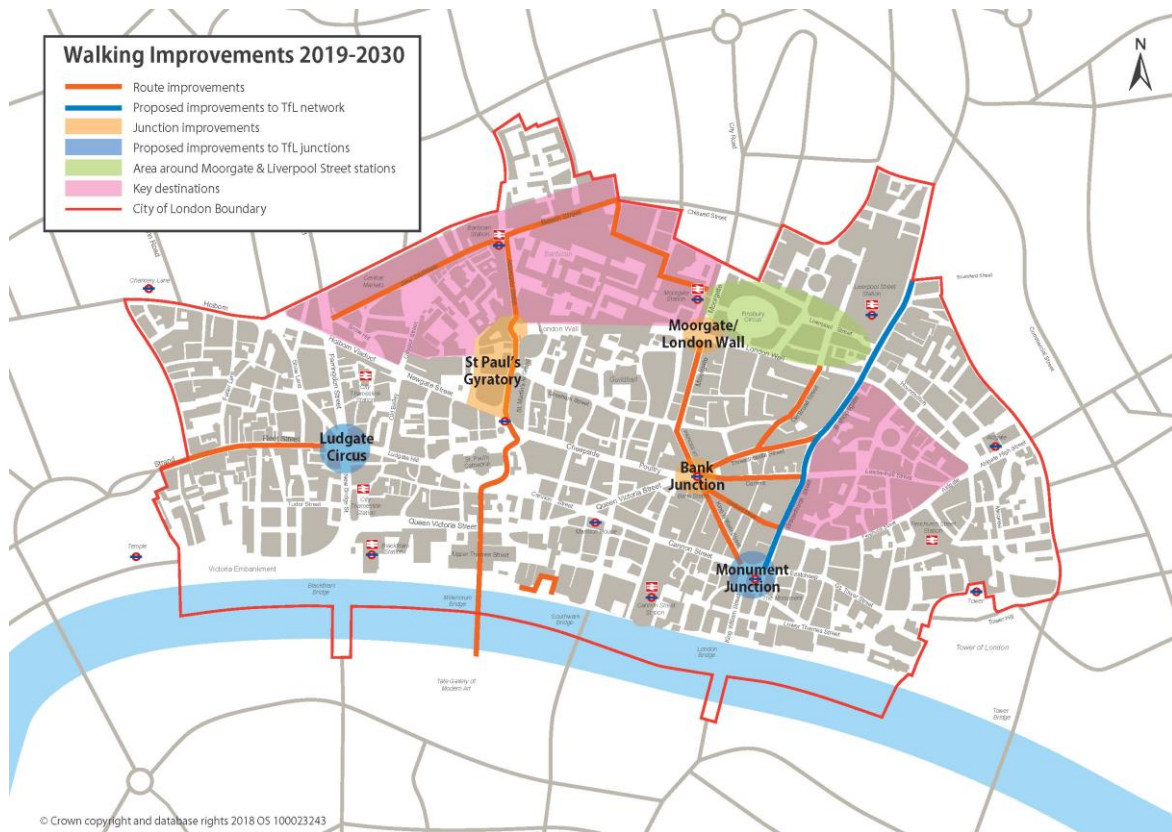


Figure 4: Proposed walking improvements 2019-2030 [MAP TO BE UPDATED]

Pedestrian priority streets

48. New pedestrian priority streets will be introduced across the Square Mile. The initial focus for introducing pedestrian priority streets will be within the City Cluster and Culture Mile. We will also identify opportunities to introduce pedestrian priority on streets with a pavement width of less than two metres. An indicative map of these streets is shown below. We will use traffic orders, temporary measures to change the look and feel of streets and signage to accelerate delivery of pedestrian priority streets in advance of permanent changes.
49. Pedestrian priority streets will be access only for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The use of pedestrianised streets by cycles will be decided on a case-by-case basis to ensure people walking and cycling feel safe and comfortable. Pedestrian priority will be supported by design measures to encourage slow and courteous driving and riding.

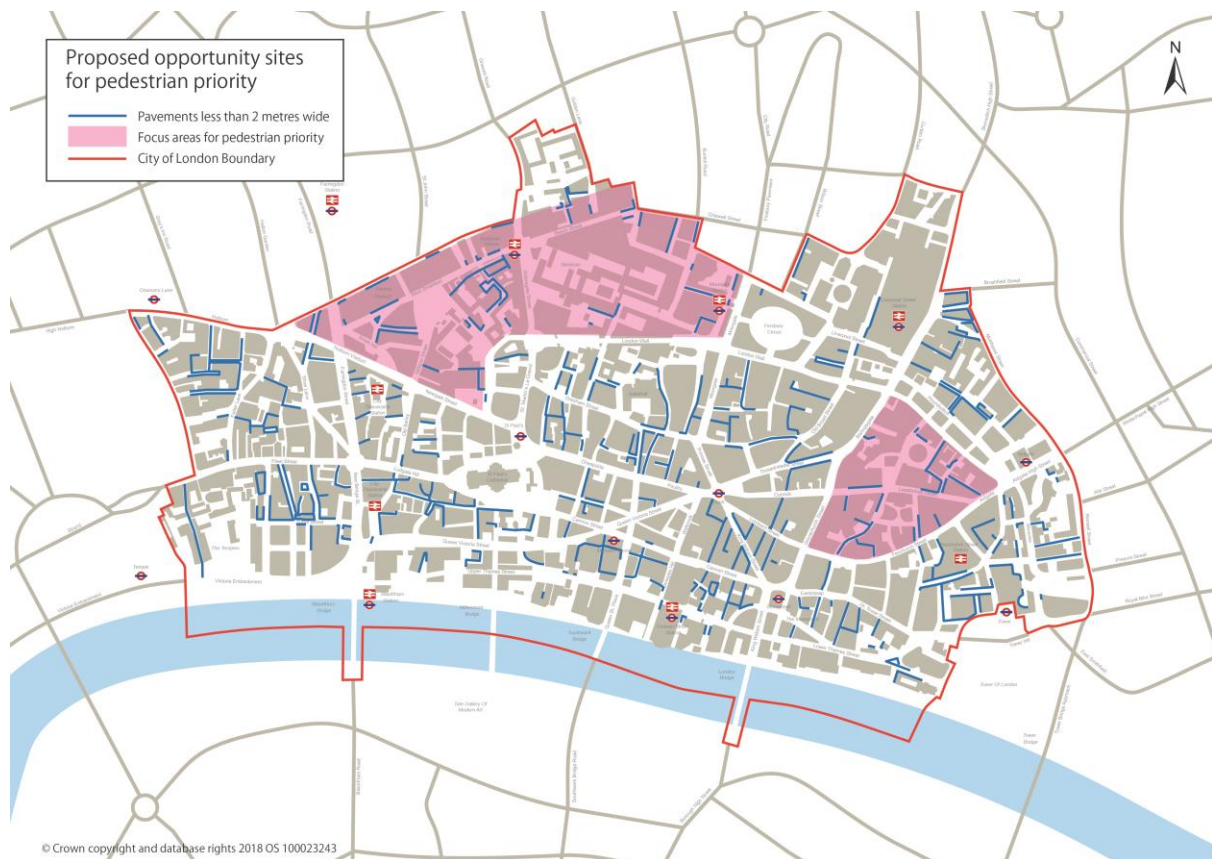


Figure 5: Proposed opportunity sites for pedestrian priority

Pedestrian crossings

50. We will work with Transport for London to make it easier for people walking to cross streets by reviewing all signalised pedestrian crossings with the aim of:

- Reducing the amount of time people wait for a green man, initially to a maximum of 60 seconds, followed by further reductions in waiting time over the life of this Strategy
- Giving people more time to cross by using a walking speed of 0.8 metres per second to determine crossing times (currently 1.2 metres per second)
- Installing sensors (Pedestrian SCOOT) to allow the amount of green man time to be automatically adjusted according to the number of people crossing
- Reducing overcrowding by widening crossings to provide a minimum pedestrian comfort level of B+
- Introducing formal diagonal crossings at all crossroads, ensuring pedestrian crossings are on desire lines and removing multi-stage crossings
- Installing raised tables to improve accessibility and ease crossing
- Introducing 'Green man authority' at appropriate locations – providing a default green man for people walking rather than a default green light for motor traffic

Continuous footways and courtesy crossings

51. We will give people walking greater priority and make streets easier to cross by:

- Providing courtesy crossings or continuous footways across all side street entrances
- Installing raised tables at junctions
- Installing raised tables at existing informal crossings and identifying locations for additional crossing points

Campaigns and promotion

52. Campaigns and promotional activities will raise awareness among all street users of the priority being given to people walking in the Square Mile. Physical changes to streets will be supported by education, engagement and enforcement to reinforce positive behaviours by drivers and riders towards people walking.

Proposal 3: Complete the riverside walkway and improve walking connections between the riverside and the rest of the City.

53. We will complete the Globe View section of the riverside walkway by 2022. We will also work with Transport for London, landowners, developers and other partners to:

- Improve the connections between the riverside and the rest of the City by making it easier to cross Upper and Lower Thames Street. Improvements will include installing a new pedestrian crossing at the junction with Puddle Dock by 2022, to provide direct access to Blackfriars Pier. We will also work with Transport for London to explore the potential to install additional street-level crossings as an alternative to existing bridges
- Improve the quality of the public realm along the riverfront and identify opportunities to create new open spaces. Opportunities will be identified and delivered through an updated Riverside Walkway Enhancement Strategy that will be published in 2022
- Wherever feasible use the redevelopment of sites along the riverside to widen the walkway
- Use the planning process to activate the riverfront by introducing more ground floor leisure uses such as restaurants and cafes where they will not adversely affect residents

Proposal 4: Enhance the Barbican high walks

54. We will ensure that the Barbican high walks are well maintained and enhanced where necessary. This will include improving signage and the visibility of access points to make them easier to navigate, particularly along the key north-south link from Wood Street.

55. We will maintain existing public lifts that provide access to the high walks and other walking routes. We will explore the potential to add new public and publicly accessible lifts where required through the development process.

Proposal 5: Ensure new developments contribute to improving the experience of walking and spending time on the City's streets.

56. Through the planning process we will work with developers and future occupiers to ensure all new developments provide world-class public realm and contribute to improvements to surrounding streets and walking routes. Existing walking routes and public access across private land will be maintained and major developments will be expected to create new walking routes through their site.

Proposal 6: Promote and celebrate walking

57. We will encourage residents, workers and visitors to explore the Square Mile on foot by:

- Completing the roll out of Legible London maps and directional signs across the Square Mile by 2022
- Improving people's awareness of traffic free walking routes, such as alleyways and routes through parks and gardens, through promotional activities and dedicated wayfinding
- Organising led walks, working with businesses and heritage and cultural institutions to promote walking and exploring the potential for an annual City walking festival
- Supporting London-wide, national and international walking campaigns

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Legible London

Legible London maps and signs were developed by Transport for London to make it easier for people to walk around London. They provide a consistent approach to wayfinding, with over 1,700 signs and maps already installed across the Capital. Legible London maps are also provided in Underground stations, and at bus stops and cycle hire docking stations.

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Proposal 7: Provide more public space and deliver world-class public realm

58. We will improve the experience of spending time on the City's streets by:

- Identifying opportunities to create new public spaces by reallocating carriageway
- Increasing the amount of formal and informal seating on-street and in squares, public spaces and parks. The amount and location of additional on-street seating will be carefully considered to maximise opportunities for social interaction while maintaining adequate width and comfort for people walking. Where necessary space will be reallocated from the carriageway
- Implementing a high standard of design when delivering improvements to streets and public spaces and ensuring streets and public spaces are clean and well maintained
- Working with partners to activate the public realm and make the experience of walking and spending time on streets and public spaces more interesting and engaging
- Improving the public realm in areas where there are buildings and structures of significant historical and architectural importance. Improvements will enhance the setting of significant buildings and other heritage assets and improve accessibility to historic attractions

59. The City of London Public Realm Supplementary Planning Document (SPD) provides detailed guidance on designing, delivering and managing world-class public realm in the Square Mile. The Public Realm SPD will be reviewed and updated by 2022 following the adoption of the City Plan 2036.

Proposal 8: Incorporate more greenery into the City's streets and public spaces

60. We will work with occupiers, businesses, residents and other partners to provide and maintain more permanent and seasonal greenery on the City's streets. This will include incorporating greenery and planting when making changes to streets and the public realm, including measures that deliver pedestrian priority, traffic calming and vehicle access restrictions. Where possible new planting will incorporate sustainable drainage. Plants will be chosen to maximise biodiversity and create a more interesting and engaging streetscape.

Proposal 9: Reduce rainwater run-off on City streets and public realm

61. Opportunities to incorporate sustainable drainage systems will be reviewed for all transport and public realm schemes, with projects designed to minimise the volume and discharge rate of rainwater run-off. The inclusion of soft landscaping, planters, green walls and trees in all schemes where space permits will also contribute to reducing run-off rates.

Proposal 10: Incorporate protection from adverse weather in the design of streets and the public realm

62. Where possible, transport and public realm projects will incorporate features that provide people walking, cycling and spending time on streets with protection from rain, wind and high temperatures. For example, shade and shelter provided by trees, building canopies and awnings and other street furniture, such as bus stop shelters. Designs will be carefully considered to ensure features to provide shade and shelter help make streets and public space more attractive and engaging.

63. The potential impact on street users of sun exposure and any increase in wind speeds and tunnel effects from new developments (particularly tall buildings) will be assessed and mitigated through the planning process.

Street space is used more efficiently and effectively

64. We want the use of the Square Mile's streets to better match the priorities of residents, workers and businesses. Street space will be used more efficiently, with more space and time provided for people walking, cycling and travelling by bus. General reductions in the number of motor vehicles will help reduce delays for the essential traffic that remains. Some streets will be used in different ways at different times of the day. For example, by providing space for people to walk and relax during the day, while allowing deliveries overnight. Temporary closures of streets to motor vehicles will provide opportunities for cultural and community events and simply enjoying the City. The kerbside will also be used more dynamically and effectively, with commercial vehicles having priority access to parking and loading no longer causing an obstruction, particularly at the busiest times of day.
65. The most common suggestion, made by a third of City Streets survey respondents, for one change people would like to see on the City's streets was for a reduction, cap, targeted or City-wide ban of motor vehicles. The second and third most requested changes were for more space for walking and more space for cycling respectively^{xiv}. When asked how different uses of the City's streets should be prioritised, respondents ranked people walking, cycling and using buses as the highest priorities.

How City Streets survey respondents prioritised different street users and uses

Street users

- ① People walking
- ② Buses and people cycling
- ③ Delivery and servicing vehicles
- ④ Taxi and private hire
- ⑤ Cars/motorcycles/mopeds

Kerbside uses

- ① Greenspace and seating
- ② Cycle parking
- ③ Loading and unloading
- ④ Taxi ranks
- ⑤ Motorcycle/moped parking
- ⑥ Parking bays

66. Over the last two decades there has been a 50% reduction of motor traffic levels in the Square Mile while the number of workers in the City has increased by 50%^{xv}. Currently, 45% of motor vehicles in the Square Mile are cars (including private hire vehicles), 21% are taxis and 22% vans and goods vehicles.
67. Cycles and buses represent the most space efficient modes of vehicular transport. Based on average occupancy, they require 200m² and 250m² of street space respectively to move 100 people. The same number of people travelling in a car or taxi would need 760m².

Proposal 11: Take a proactive approach to reducing motor traffic

68. Delivering this Strategy will result in a reallocation of street space from motor vehicles to provide more space for people walking, cycling and spending time on the City's streets. To avoid unreasonably impacting the movement of essential motor traffic it will be necessary to reduce the overall volume of motor vehicles on the City's streets. Reducing motor traffic is also key to improving air quality and delivering Vision Zero.

Essential traffic



Walking



Cycling



Buses



Freight and servicing with a destination in the City



Private and shared vehicles being used by people with particular access needs

69. We will proactively seek to reduce motor traffic to support the delivery of this Strategy, with the aim of achieving a 25% reduction by 2030. Reductions in all types of motor traffic will be required to achieve this, with the most significant reductions being in the number of private cars and private hire vehicles using the City's streets.
70. To achieve this, we will champion and support the development of the next generation of road user charging for London and encourage the Mayor of London and TfL to accelerate the development of new charging mechanisms.
71. This new approach to charging should be implemented within the next Mayoral term. All income should be reinvested in the delivery of Healthy Streets, with a proportion of income generated ring fenced to provide funding for City of London and borough projects.

72. While the new charging mechanism is being developed, we will encourage TfL to undertake a further review of the existing Congestion Charge. This review should be wide-ranging and consider charging levels, boundaries, timings and exemptions.
73. If a clear commitment to road user charging is not set out in the next Mayor's election manifesto, we will explore the feasibility of developing an appropriate charging mechanism for the Square Mile, working with London Councils and London's boroughs to ensure a coordinated approach.
74. Additional measures and initiatives to reduce motor traffic in the Square Mile will include:
- Supporting TfL's efforts to reduce the number of Private Hire Vehicles operating in central London. We will also work with TfL and large operators to reduce circulation and empty running and promote ridesharing
 - Working with the taxi industry to reduce empty running of taxis within the Square Mile, including a City-wide review of taxi ranks and promotion of ride hailing apps
 - Delivering Proposals 38 and 39 to reduce the number of delivery and servicing vehicles in the Square Mile, particularly at peak travel times
 - Working with TfL to identify opportunities to reduce the number of buses travelling through the City without compromising public transport accessibility (Proposal 49)
 - Not providing any additional on-street car and motorcycle parking, identifying opportunities to use parking reductions and restrictions to discourage private vehicle use and continuing to require all new developments to be car-free
 - Working with businesses to reduce the use of private cars, private hire vehicles and taxis for commuting and for trips within the Square Mile and central London
 - Introducing access restrictions and other measures to reduce through traffic in line with the City of London Street Hierarchy (Proposal 12)
75. In addition to reducing traffic by 25% by 2030 we will aim for a reduction in motor traffic volumes of at least 50% by 2044. We will publish more details about how we plan to achieve this level of reduction, including working with TfL to develop coordinated measures across central London, following the next Mayoral election and clarification of how the next Mayor will approach road user charging in central London. Achieving this level of traffic reduction is likely to require new shared mobility services and other transport technology innovations, which the City Corporation will support and champion through our Future Transport Programme (Proposal 43).

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Road User Charging

London was a global leader in road user charging when the Congestion Charge was introduced to central London in 2003. There was an immediate reduction in congestion of 30% and 15% less circulating traffic^{xvi}.

The Congestion Charge is now 15 years old and has only been subject to minor alterations since it was introduced. In this time, the challenges facing central London have changed considerably. A thriving weekend and night time economy now means that evening and weekend traffic levels (when the Congestion Charge is not in operation) are now similar to those on weekdays. In addition, the proportion of vehicles in the zone that are subject to the charge continues to reduce; particularly because of increasing numbers of licensed private hire vehicles, which are currently exempt from the charge.

An updated road user charge, that could be varied according to patterns of demand and by vehicle type, would be more effective in reducing traffic levels and congestion in central London. A central London or London-wide approach, compared to a City specific charge, would be the most beneficial model. This will help reduce traffic over a much wider area and avoid a 'patchwork' approach to traffic management by different authorities.

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Proposal 12: Design and manage the street network in accordance with the City of London Street Hierarchy

76. The City of London Street Hierarchy describes the function of every street in terms of motor traffic movement. We will design and manage the street network in accordance with the hierarchy to encourage drivers to use the right street for the right journey.

77. The categories in the hierarchy are:

London Access streets	Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.
City Access streets	Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations.
Local Access streets	Primarily used for the first or final part of a journey, providing access for vehicles to properties.



Figure 6: Proposed City of London Street Hierarchy

78. A street's position in the hierarchy will be one factor that helps inform decisions on how space is allocated between different users and uses of that street. Alongside the street hierarchy we will also consider:

- The views and aspirations of different street users and City residents, workers and businesses
- How to best prioritise walking, cycling and buses as the most efficient ways to move people
- How to incorporate the street's role as a public space and reflect the types of buildings and uses along it, including planned development
- How to provide appropriate access for delivery, servicing, and other commercial activities
- How to provide access for residents, people of all abilities and people with access requirements, such as heavy luggage or injuries and illness
- How to maintain emergency response times and access for emergency services

79. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider:

- How to reduce the use of Local Access streets by through traffic, while maintaining access
- Opportunities to introduce pedestrian priority, improve the experience of walking and cycling, enhance the public realm and create new public space
- Potential changes to kerbside uses including loading and parking

- Opportunities for area-based approaches to the management of freight and servicing, including consolidation and retiming of deliveries
- The need for network changes to support planned and future development

80. The first three plans, to be developed by 2022, will cover the following areas:

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum for London. The area covered will align with City Plan 2036 Barbican and Smithfield key area of change
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting the delivery of the proposed Centre for Music and associated changes to the Museum of London roundabout and St Paul's Gyratory
- City Cluster and Fenchurch Street – responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Plan 2036 City Cluster key area of change and incorporate part of the Aldgate and Tower key area of change

81. Healthy Street Plans will be developed in consultation with residents, businesses and other partners and stakeholders. Initial delivery will focus on implementing functional network changes, small scale projects and temporary interventions to change the look and feel of streets and provide additional public space. This will be followed by full implementation, including major transformational projects, that will be programmed to correspond with major developments in the area.

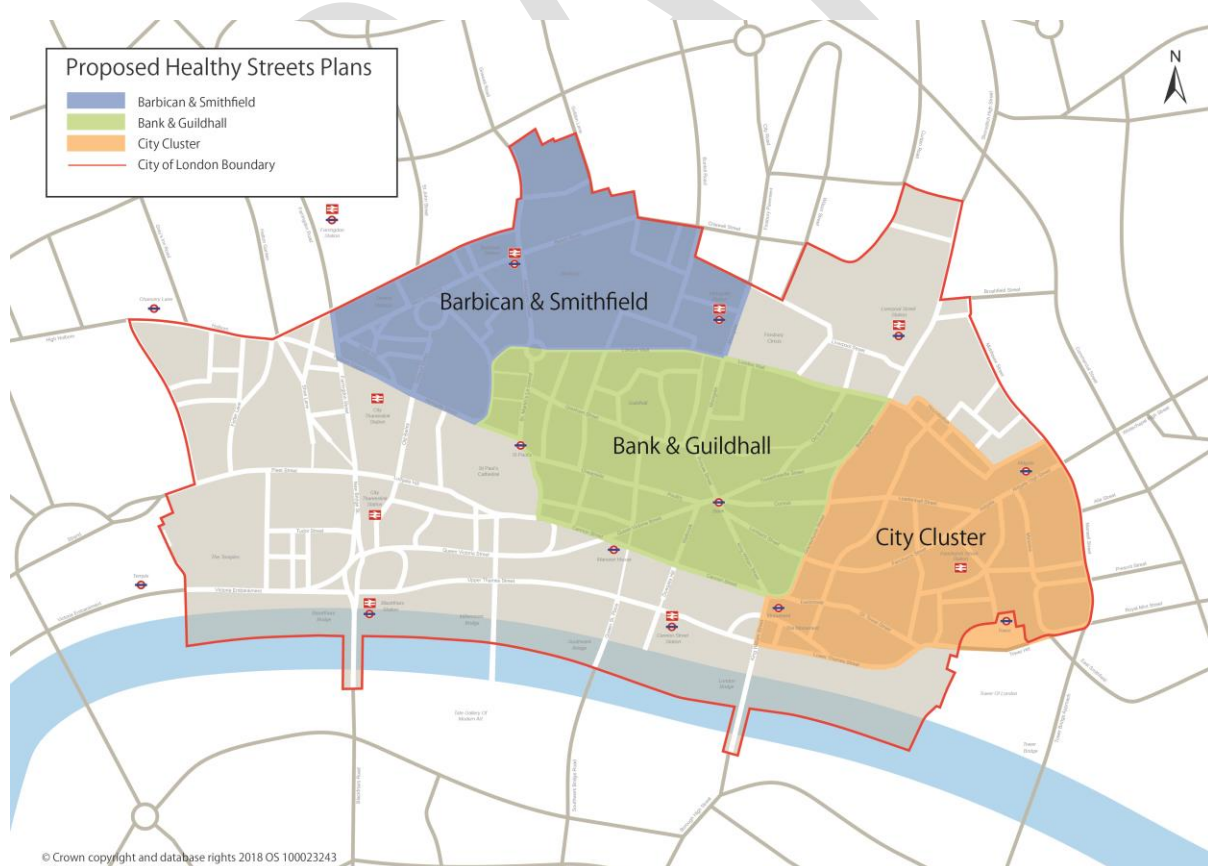


Figure 7: Proposed Healthy Streets Plan areas

Proposal 13: Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time

82. Where necessary and appropriate, we will introduce timed restrictions to motor vehicle access to support the implementation of pedestrian priority streets; make walking and cycling safer and more accessible; and improve the experience of spending time on the City's streets. The potential for timed closures to general motor traffic to improve bus journey times will also be explored. The extent of timed restrictions and types of vehicles excluded will be decided on a case-by-case basis, applying the approach outlined in Proposal 12, and subject to modelling, impact assessments and consultation prior to implementation.
83. We will also seek to improve the experience of walking and spending time on the City's streets by:
- Launching a Lunchtime Streets programme in 2019 to provide additional space for people using streets at lunchtime during the summer months. At least five Lunchtime Streets will be in operation by 2025
 - Supporting the leisure and cultural offer of the City by holding 'car-free' weekends and days, with streets only open to people walking and cycling. We will aim to hold the first car-free day, covering the area around Guildhall and Bank, in 2019
 - Supporting and facilitating closures by third parties and residents, particularly those that help promote walking and cycling and allow residents, workers and visitors to enjoy the City's leisure, cultural and historical offer
 - Exploring the potential to make better use of street closures already required to facilitate existing events, such as the Lord Mayor's Show and City Run. For example, by extending the time closures are in place or increasing the number of streets that are closed to traffic

Proposal 14: Make the best and most efficient use of the kerbside and car parks

84. We will keep the use and management of the kerbside and City Corporation car parks under frequent review to:
- Identify opportunities to reallocate space from on-street car and motorcycle parking to increase the space available for people walking, support the delivery of cycle infrastructure and provide additional public space and cycle parking
 - Ensure adequate on-street provision of short stay commercial parking, disabled bays, taxi ranks, loading bays and coach bays
 - Identify spare capacity in City Corporation car parks and explore alternative uses for this space
 - Identify opportunities to reduce obstructions caused by vehicles loading or waiting to pick up passengers, particularly on bus and cycle routes and at peak travel times
85. We will complete and consult on the outcomes of the first City-wide kerbside review by 2022. In addition to the items outlined above, this review will consider the potential to:
- Extend the charging period for on-street parking bays to include evenings and weekends for non-commercial vehicles
 - Introduce variable charging for motorcycle parking based on motorcycle size and emissions

- Encourage the use of car parks for long stay parking by reducing the maximum parking time for cars and vans on-street and introducing a maximum on-street parking time for motorcycles
- Extend the Controlled Parking Zone hours to evenings and weekends
- Designate on-street car parking as 'service bays' during the working day (7am-7pm), with parking restricted for use by commercial vehicles
- Reduce the maximum loading period from the current 40 minutes when the City's Controlled Parking Zone restrictions apply
- Introduce more dedicated loading bays and use technology to allow real-time management of loading activity
- Implement multi-use spaces, for example loading bay during off-peak hours, additional pavement space during the morning, lunchtime and evening peaks and a taxi rank during the evening

Further reviews will be conducted at least every five years.

Proposal 15: Support and champion the 'Turning the corner' campaign

86. We will support efforts to secure changes to the Highway Code and national legislation to give people walking and cycling priority at all types of junctions over traffic turning across their path. This arrangement enables simpler junction designs and reduces waiting times at signal-controlled junctions for all users, including drivers. By reducing conflicts between left turning vehicles and people walking and cycling, these changes will support proposals to prioritise people walking and deliver Vision Zero.

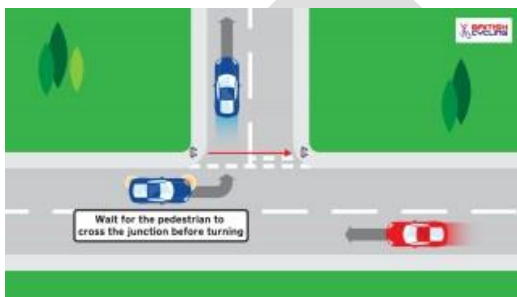
Turning the corner campaign

'Turning the Corner' is a campaign led by British Cycling, encouraging the Government to update the Highway Code and national legislation to change the way priority is given at junctions to people walking and cycling. These changes would bring benefits to all street users by improving safety for people walking and cycling and allowing junction layouts to be simpler and clearer and more efficient for all users.

Example changes to junctions:



At a signal-controlled crossing, the changes would mean people walking, people cycling and motor traffic going in the same direction would all receive a green signal at the same time. Vehicles turning across those walking and cycling would have to give way. Most other countries, including the rest of Europe, operate their signal-controlled crossings in this manner.



At a T-junction, vehicles entering and exiting the minor road would have to give way to both people walking across the minor road and people cycling going straight ahead on the major road. This arrangement is used across much of Europe.

The Square Mile is accessible to all

87. Everybody must be able to travel easily, comfortably and confidently to and around the Square Mile. Delivering the Strategy will help remove obstacles to walking, cycling and using public transport. Pavements and crossings will be smooth, level and wide enough to avoid uncomfortable crowding. People using cycles as mobility aids or mobility scooters and powered wheelchairs will be able to use new and improved cycle lanes. Streets will be cleaner, quieter and less stressful places that offer more opportunities to stop and rest. Changes to streets will be supported by new transport technologies that will emerge over the next 25 years, including new shared transport services. Advancements in app-based technologies and other transport innovations will help provide specialised and tailored accessibility support for anyone who may benefit from them. An accessible public transport network will mean that people with limited mobility are no longer penalised by having to make longer or more expensive journeys.
88. 14% of Londoners currently consider themselves to have a disability that impacts their day to day activities 'a little' or 'a lot'. This is expected to rise to 17% by 2030^{xvii}. Walking is the main mode of travel for disabled Londoners, with 78% reporting they walk at least once a week. However, 65% of disabled Londoners consider the condition of pavements to be a barrier to walking more frequently^{xviii}. London-wide the proportion of disabled Londoners who travel by Underground and National Rail is considerably lower than for non-disabled Londoners. Gaps in the step-free public transport network mean that a step-free journey is on average 11 minutes slower than a journey using the full network^{xix}. Transport has been identified as the biggest challenge to living in the Capital for people with Dementia (an estimated 72,000 Londoners currently live with Dementia)^{xx}.
89. Respondents to our City Streets survey who identified as having a disability or long-term health conditions, highlighted particular concerns about poor air quality, motor traffic volumes and public transport crowding^{xxi}.

Proposal 16: Develop and apply the City of London Street Accessibility Standard

90. We will work with City residents, workers, the City of London Access Group (COLAG), our internal access team and groups representing the needs of different street users to develop the City of London Street Accessibility Standard (COLSAS). COLSAS will set minimum and desired standards for the design of streets to ensure they provide an environment where all current and potential users feel welcome and safe and can travel comfortably and confidently.
91. The standard will be applicable to all City Corporation managed streets and we will work with TfL to apply the standard to the Transport for London Road Network. We will apply COLSAS by carrying out a detailed access audit of all City streets to assess the current level of accessibility. Details of necessary improvements, including a delivery timetable, will be set out in a Streets Accessibility Action Plan. COLSAS and the Streets Accessibility Action Plan will be published by 2022. Improvements to streets that do not meet the minimum COLSAS standard will be prioritised, with all critical improvements delivered by 2025.

Proposal 17: Keep pavements free of obstructions

92. We will ensure that pavements are free of obstructions by:

- Not permitting a-boards on the pavement and encouraging owners and occupiers to not place a-boards on private land adjacent to the pavement
- Only allowing outdoor seating where businesses can demonstrate that adequate width will be maintained during the busiest time of day
- Working with owners and landlords and using the licensing system to prevent pavements and streets being blocked by people standing outside bars and pubs
- Ensuring operators of dockless cycle hire schemes require users to leave bikes in designated parking locations and promptly remove any cycles not left in these locations (see Proposal 28)
- Continuing to reduce clutter by removing unnecessary street furniture and ensuring remaining furniture is positioned to maintain a clear walking route, including identifying opportunities to affix street lights and signs to buildings
- Seeking to maintain a pedestrian comfort level of B+ when installing new street furniture, signage, trees and greenery, bollards and security features (see Proposal 2)
- Ensuring that temporary signage does not significantly reduce pavement width and work with contractors, utilities and developers to ensure signs are placed in carriageway when they will not pose risk to other road users
- Review the role of pavement obstructions in incidences of trips, falls and claims against the City Corporation

Proposal 18: Keep pedestrian crossings clear of vehicles

93. We will work with TfL and London Councils to encourage the Government to change the Highway Code and introduce new legislation to prevent queuing vehicles blocking pedestrian crossings. Any new offences should be decriminalised to allow civil enforcement through issuing a penalty charge notice.

94. While awaiting legislative change, we will encourage drivers to leave crossings clear through targeted campaigns and trialling changes to crossing design, such as coloured markings or box junction style hatching.

Proposal 19: Support and champion accessibility improvement to Underground stations

95. We will work with TfL to prioritise investment in accessibility improvements to Underground and DLR stations within the Square Mile, beginning with making Bank Station accessible. Through the planning process we will identify opportunities to introduce step free access as part of new developments and major refurbishments. We will also work with Network Rail to introduce step free access at Moorgate national rail platforms. Our ambition is that all stations within the Square Mile are accessible by 2044. We will liaise with TfL to identify the programme of investment required to achieve this and include further details the final version of this Strategy.

Step-free access to London Underground and DLR stations in the City



Full step-free access

Blackfriars



Partial step-free access

Tower Hill
Liverpool Street
Moorgate
Cannon Street
Bank
Barbican



No step free access

Mansion House
Monument
Aldgate
St Pauls
Chancery Lane

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

96. No one should be prevented from choosing a particular mode of transport because of concerns for their personal safety. Delivering this Strategy will result in fewer motor vehicles on our streets and those vehicles will be moving at slower speeds. Collisions will occur less often and will not result in death or serious injury. Fewer, slower vehicles, together with high quality street lighting, will also mean that streets feel safer at all times of the day. Motor vehicles themselves will be equipped with advanced sensors and better automatic safety features that will further reduce or eliminate human driving error. Security features will be sensitively incorporated into the streetscape and will incorporate features that help make streets more attractive places to walk and spend time. The Square Mile will continue to experience a low rate of crime and fear of crime, supported by reductions in thefts of and from vehicles.
97. In 2017, 54 people were killed or seriously injured in traffic collisions on the City's streets, including 26 while walking, 15 while cycling and nine while riding a moped or motorcycle. The number of people killed and seriously injured in the Square Mile has unfortunately remained relatively consistent at approximately 50 a year, since 2010^{xxii}. Nine out of 10 collisions in the Square Mile that result in a death or serious injury involve a motor vehicle^{xxiii}.
98. The City is fortunate to experience low levels of crime and fear of crime, with 80% of people reporting that they feel safe from crime and terrorism^{xxiv}. While this is encouraging, we must continue to provide high-quality policing, well designed and maintained public spaces and proportionate security measures that ensure people are safe and feel safe.

Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

99. We will deliver Vision Zero to eliminate death and serious injuries on the City's streets by 2040. Our interim targets are that no more than 35 people a year are killed or seriously injured by 2022 and that there are fewer than 16 deaths or serious injuries a year by 2030
100. Measures to deliver Vision Zero and reduce road danger will be delivered across four themes:
- Safer streets
 - Safer speeds
 - Safer vehicles
 - Safer behaviours
101. We will work in partnership with the City of London Police, TfL and organisations representing different street users to apply the safe system approach and the principles of road danger reduction. This means:
- Being proportional in our efforts to tackle the sources of road danger, focussing on those users of our streets who have the greatest potential to harm others due to the size and speed of their vehicle

- Recognising that people will always make mistakes and that collisions can never be entirely eliminated. Our streets must therefore be designed, managed and used to cater for an element of human error and unpredictability
 - Reducing vehicle speeds on our streets to minimise the energy involved in collisions and protect people from death or injury
 - Seeking to reduce slight injuries and fear of road danger alongside the principal focus on eliminating death and serious injuries
102. We will publish a comprehensive Road Danger Reduction Action Plan every five years. The 2018 – 2023 plan will be updated in 2019 immediately following the adoption of this Strategy.

Safer streets

103. We will redesign our streets to reduce the likelihood and severity of collisions. Locations for change will be identified and prioritised based on the risk to people walking, cycling and riding powered two wheelers, and the number and severity of collisions. Locations will be reviewed on an annual basis.
104. Priority locations for change by 2030, using analysis of data from 2012 to 2017 data, are:
- Moorgate (London Wall to Eldon Street)
 - High Holborn (Holborn Circus to Warwick Lane)
 - Cannon Street (Mansion House Station to New Change)
 - St Paul's Gyratory
 - Aldersgate Street/Beech Street
 - Fleet Street/New Fetter Lane Junction
 - Lombard Street – Fenchurch Street Corridor
 - Old Broad Street/London Wall
 - Camomile Street/St Mary's Axe
105. In addition, we will work with TfL to deliver changes at the following priority locations on the TLRN:
- Bishopsgate
 - Monument Junction
 - Embankment (Temple Avenue to Puddle Dock)
 - Mansell Street
 - Southwark Bridge/Lower Thames Street
 - Upper Thames Street (London Bridge to Eastcheap)
106. In addition to the above we will work with TfL to monitor and if necessary further improve Farringdon Street and New Bridge Street (including Ludgate Circus).

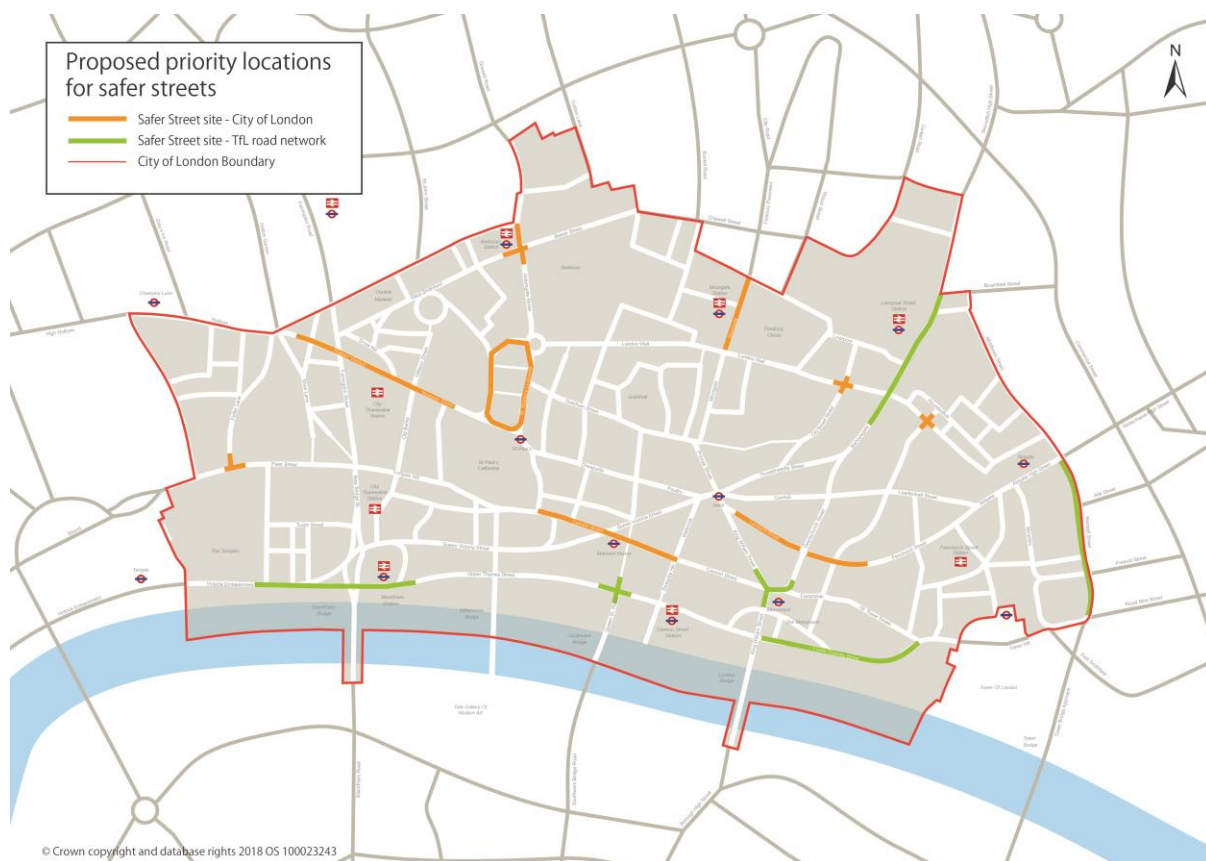


Figure 8: Proposed priority locations for safer streets]

107. Other measures to change streets to reduce the likelihood and severity of collisions will include:

- Narrowing and raising the entrances to side streets to require drivers and riders to manoeuvre more slowly
- Exploring the potential for changing the look and feel of streets to reinforce positive behaviours by people driving and riding in the Square Mile, including appropriate speed, acceleration and overtaking. Innovative techniques that use road markings and temporary or light touch changes to give behavioural cues will be trialled and assessed in up to five locations by 2022
- Continuing to maintain a smooth and level surface on pavements and carriageways to reduce the risk of trips and falls by people walking and riding in the City

Safer speeds

108. Reducing the speed of vehicles decreases the likelihood of a collision and the severity of injury in the event of one.

109. To ensure people drive and ride at speeds appropriate to the City context we will seek permission from the Department for Transport to adopt a City-wide 15mph speed limit by 2022. If successful, we will encourage TfL to seek permission to deliver this new limit on the TLRN, particularly along the Bishopsgate corridor.

110. We will work with the City of London Police to deliver engagement, education and enforcement to support the implementation of the 15mph speed limit.



111. To make it easier for drivers to comply with the existing 20mph and proposed 15mph speed limits we will encourage the uptake of intelligent speed adaptation (ISA) in the Square Mile by:

- Asking TfL to prioritise the roll out of bus ISA on routes which operate in the Square Mile, with the aim of bus ISA operating on all routes by 2022.
- Adopting ISA in our own fleet procurement practices as part of our renewal programme. Insurance savings will be quantified and shared as best practice guidance for City suppliers and through the Fleet Operator Recognition Scheme (FORS)
- Ensuring ISA is a standard requirement for any service procured by the City Corporation with a fleet requirement
- Promoting the installation of ISA in taxis and private hire vehicles and encouraging TfL to make ISA a requirement for new taxis and private hire licensing.
- Encouraging the uptake of ISA in other fleets, such as hauliers, construction firms and coach operators
- Working with the insurance industry and vehicle manufacturers to promote and encourage the use of ISA in private vehicles

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Intelligent Speed Adaptation

Intelligent speed adaptation (ISA) is an in-vehicle system which uses GPS and a database of speed restrictions to limit vehicle speeds. Studies have shown that ISA delivers a substantial decrease in average speed and speed variances and eliminates speed limit violations. It is estimated that non-voluntary ISA could halve the number of fatal collisions in the UK¹.

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Safer vehicles

112. We will improve the safety of motor vehicles which use City's streets by:

- Using the Fleet Operator Recognition Scheme (FORS) to integrate safety into fleets by:
 - Continuing the CityMark accreditation programme to ensure vehicles at City construction sites meet FORS standards. We will encourage the inclusion of CityMark in Construction Logistic Plans (CLP).
 - Encouraging TfL and industry stakeholders to develop FORS standards for coaches and vans by 2022.
 - Encouraging the integration direct vision standards as part of FORS. This will also be mandated through CLPs and CityMark for City construction sites once the standards are implemented and normalised.
 - Supporting TfL with developing a motorcycle FORS standard for couriers and delivery riders, which will include improved safety training.
- Continuing to inspect over 1000 vehicles each year with the City Police Commercial Vehicles Unit. We will identify opportunities to intensify the programme and map enforcement related to development density by 2022.
- Work with industry, sector associations and motorcycle riders to identify and understand levers for motorcyclists to choose lighter, less powered vehicles when riding to and around the City.
- Identifying any potential risks associated with the uptake of new technologies, including the increased use of quieter zero emission capable vehicles.

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Fleet Operator Recognition Scheme and CityMark

The Fleet Operator Recognition Scheme (FORS) is a voluntary accreditation scheme for fleet operators. The scheme aims to raise the level of quality within fleet operations, and to demonstrate which operators are achieving best practice in safety, efficiency, and environmental protection.

CityMark is a project developed by the City Corporation to improve monitoring of vehicle standard compliance at construction sites in the Square Mile.

All construction projects in the City are members of the Considerate Contractors Scheme (CCS) and CityMark is an addition to that scheme. This keeps the CCS up to date with the leading related safety initiatives, FORS and the Construction Logistics for Community Safety (CLOCS) standard.

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Safer behaviours

113. We will encourage all the users of our streets to travel safely by:

- Expanding the 'exchanging places' training course for professional drivers to include the experience of walking, as well as cycling, in the Square Mile
- Encouraging TfL to require safety training as part of private hire and taxi licensing. This will include Bikeability Level 3 training
- Providing and promoting free cycle training for people who live, work and study in the City; working closely with City businesses to offer this training in a convenient and easily accessible way
- Encouraging TfL to include safety-based performance measures instead of timetable performance measures in bus contracts. We will work with TfL and operators to implement these changes as part of its Bus Safety Standard
- Working with the City of London Police to deliver targeted enforcement of dangerous and reckless driving and riding, including using plain clothed officers
- Promoting safe driving and riding through targeted behaviour change campaigns.
- Work with the freight industry and research partners to understand the impact of delivery schedules on driving style and speeds

Proposal 21: Work with the City of London Police to reduce crime and fear of crime

114. We will work with the City of London Police to ensure the design and management of streets helps everyone feel safe and reduces opportunities for crime at all times of the day. Quarterly meetings will review crime trends and methods and identify opportunities to reduce crime through changes to street design and management, enforcement and awareness campaigns.
115. Initial measures to reduce vehicle theft and vehicle enabled crime will include:
- Trialling ground anchors at motorcycle theft hotspots to reduce thefts and help tackle motorcycle enabled crime. We will initiate the trial in 2019 and review the utilisation of anchors and impact on theft rates ahead of proposed roll out
 - Running campaigns with motorcycle and cycle groups to promote best practice locking and security measures
 - Reviewing security provision in City Corporation car parks and other assets as part of the development and delivery of last mile logistics facilities (see Proposal 38)

Proposal 22: Ensure on-street security measures are proportionate and enhance the experience of spending time on our streets

116. We will work with the City of London Police, developers and City businesses to support the Secure City program by taking a risk-based approach to implementing appropriate and proportionate on-street security measures. We will aim to ensure that security measures are:
- Discreet and installed to avoid reducing the space available to people walking and cycling
 - Multi-functional, incorporating seating, greenery or public art where possible to improve the experience of walking, cycling and spending time on streets
 - Designed and installed to take account of the access needs of people with disabilities
 - Designed and installed to take account of access requirements for servicing
117. We will work with industry partners to develop hostile vehicle mitigation standard benches, planters, fountains and other street furniture. This will include moveable security features to support timed access restrictions for motor vehicles.

Proposal 23: Improve the quality and functionality of street lighting

118. By 2022 the City Corporation will have upgraded its street lighting in accordance with the City of London Lighting Strategy. The following principles will be embedded across our transportation and public realm schemes as well as developments through the planning process.
- Use street lighting to improve the look, feel and ambience of streets
 - Improve the quality of lighting for people walking and cycling
 - Reduce road danger through appropriate lighting at areas of higher risk, such as junctions
 - Match lighting provision to the City of London Street Hierarchy and the character of streets

- Ensure lighting supports CCTV operation
- Allow flexible lighting control to support City of London Police operations

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More people choose to cycle in the City

119. Most of the vehicles on the City' streets will be cycles, with more people choosing to cycle and cycles being used for more types of journeys. We want the range of people choosing to cycle to match the diversity of people who live, work and study in or visit the City. Most people, whether they choose to cycle or not, will consider cycling to be a safe, easy and pleasant way to travel around the Square Mile. Reduced traffic, slower speeds and a dense network of cycle friendly streets will mean that anyone who wishes to cycle is not prevented from doing so because of concerns about safety. The cycle network will cater for all types of cycles, including cycles as mobility aids and cargo cycles. Different types of cycles will also be available for hire across the City, supporting more flexible cycling. A safer and more relaxed cycling experience will in turn encourage safer and more relaxed cycling behaviour that reflects the priority given to people walking on the City's streets.

120. Our City Streets survey found that only 4% of people currently consider the experience of cycling in the City to be pleasant (and 56% consider it to be unpleasant). We want this figure to be 75% by 2044. More than half of people cycling in the City scored their feeling of safety while cycling as a 1 or 2 out of 5^{xxx}. On average 19 people cycling have been killed or seriously injured on our streets every year for the last five years^{xxxi}. We recognise that the current situation on many of our streets is also leading to perceived and real conflicts between people who cycle and other streets users, with negative interactions between people walking and cycling being raised as a significant issue in public consultations.

121. Despite these challenges, the number of people choosing to cycle in the Square Mile has grown significantly over the last 20 years. People cycling now make up nearly a third of all vehicular traffic during the daytime in the City, compared with less than 4% in 1999^{xxxi}. There is significant potential to further increase the number of people cycling. Analysis by TfL has found that up to 15,700 trips a day to the City that are currently made by motorised modes could potentially be cycled in part or full. Over two thirds of these trips are currently made by taxi or car^{xxxiii}.

Proposal 24: Apply a minimum cycling level of service to all streets

122. We will make the Square Mile a safe, attractive, and accessible place to cycle by applying a minimum cycling level of service to all streets by 2044.

123. On the streets shown in Figure X below, which will form a core cycling network, we will ensure that either:

- Motor traffic volumes are kept below 150 vehicles an hour in each direction at the busiest time of day and priority is given to people cycling over motor vehicles. If necessary, we will introduce traffic management measures to reduce the number of vehicles on these streets.

or

- Protected cycle lanes that are a minimum of 1.5m wide per direction of travel are provided, with 2m wide protected cycle lanes wherever possible.

124. We recognise that initially it may not be possible to achieve these levels of service at all locations and will identify mitigating measures in the short and medium term to manage this.

125. We will prioritise cycling improvements and interventions on the core cycle network. This will ensure that nearly all property entrances are within 250m of the network, providing access to destinations across the Square Mile and linking with the wider London cycle network.

126. We will support cycle logistics and the use of cycles as mobility aids by ensuring that all parts of this network are designed to be accessible to non-standard cycles, such as cargo cycles or adapted cycles.

127. We will deliver the following parts of the core cycle network by 2030:

- Aldgate to Holborn Circus via Bank including connecting the City Cluster to Cycle Superhighway (CS) 2 and CS6
- CS3 to St Paul's via the City Cluster and London Wall (in conjunction with planned network improvements at St Paul's Gyratory)
- CS1 to CS4 via Bank (including working with TfL to make improvements to Monument Junction)
- Bank to Blackfriars (including improvements at Mansion House junction)
- CS2 to CS3 via Mansell Street (in partnership with TfL)



Figure 9: Proposed core cycling network and phasing

128. On Local Access streets that do not form part of the core cycling network, we will aim to keep motor traffic volumes below 150 vehicles an hour in each direction at the busiest time of day to give priority to people cycling over motor vehicles. For the majority of Local Access streets this will require relatively little intervention, other than junction improvements. Traffic levels are already low, and this Strategy will deliver reductions in traffic volumes (Proposal 11) and introduce a City-wide 15mph speed limit (Proposal 20). In cases where traffic volumes exceed this limit we will seek to reduce traffic volumes through changes to access and traffic management.
129. On City Access streets, we will aim to meet the standards described above but recognise this may not be possible on all streets due to their role in traffic movement or space constraints. Other proposals in this Strategy, such as the introduction of a City-wide 15mph speed limit, will help make these streets safer, more attractive, and more accessible places to cycle.
130. To support the new cycling levels of service we will also:
- Review all shared pedestrian/cycle spaces, such as Queen Street, and where necessary propose physical changes, campaigns, education, engagement and enforcement to improve interactions between people walking and cycling
 - Use signage and road markings to emphasise priority for people cycling over motor vehicles
 - Introduce safety improvements at the priority locations identified in Proposal 21 to ensure they are safe and easy places to cycle
 - Trial temporary schemes and infrastructure wherever possible to review impacts on other street users and accelerate the delivery of the cycle network
131. Additional measures to support the delivery of the core cycle network will include:
- The use of Construction Logistics Plans and Delivery and Servicing Plans to manage the number of freight vehicles using the network, particularly at peak times
 - Enhanced cycle wayfinding and signage
 - Working with boroughs neighbouring the City and TfL to improve continuity and connectivity between our cycle networks

Proposal 25: Increase the amount of cycle parking in the City

132. We will conduct a City-wide cycle parking review and publish a Cycle Parking Delivery Plan by 2022. This will:
- Review the availability and distribution of both on and off-street public and residential cycle parking provision to ensure adequate provision, taking account of forecast demand
 - Assess requirements for public and residential cycle parking that can accommodate cargo cycles and adapted cycles
 - Promote the use of City Corporation car parks for long stay cycle parking.
 - Explore the potential for innovative parking solutions that increase the space efficiency of cycle parking
 - Assess the potential for commercially operated cycle parking hubs that provide enhanced security and facilities
 - Assess occupancy levels of cycle parking in recently completed commercial buildings to understand current use and inform future planning policy on workplace cycle parking

Further reviews will be conducted on a regular basis, and at least every 5-years.

Proposal 26: Ensure new developments contribute to improving the experience of cycling in the City

133. Through the planning process we will work with developers and future occupiers to:

- Ensure all new developments provide secure cycle parking facilities, that are at least in line with the London Plan's minimum standards for cycle parking, have step free access and include lockers and showers in commercial developments
- Encourage the provision of parking facilities that are suitable for non-standard cycles, including providing off-street storage for cargo bikes and hand carts in developments that include ground floor retail and takeaway food outlets
- Provide on-site short stay cycle parking for visitors and, where possible, additional public cycle parking in the public realm
- Contribute to improving conditions for cycling on adjacent streets, particularly those that connect to or form part of the core cycling network

Proposal 27: Promote and celebrate cycling

134. We will encourage residents, workers and visitors to cycle to and around the Square Mile by:

- Connecting businesses and residents to additional cycling support services, such as maintenance and insurance
- Improving people's awareness of the cycling network and cycle routes to the City through promotional activities and wayfinding
- Organising led rides, working with businesses and heritage and cultural institutions to promote cycling
- Exploring the potential for an annual City cycling festival
- Supporting London-wide, national and international cycling campaigns and hosting periodic cycling events
- Targeted campaigns and promotional activities to encourage a more diverse range of people to cycle

Proposal 28: Improve cycle hire in the City

135. We will work with TfL and cycle hire providers to improve the quality and accessibility of all cycle hire facilities including docked, dockless, and cargo cycles for residents, workers, and visitors. In doing so, we will ensure that:

- Cycles for hire are readily accessible in suitable numbers and in appropriate locations across the City
- There are adequate parking and docking facilities and that these are managed to respond to peaks in demand
- Hire cycles and associated infrastructure do not obstruct pavements or pedestrian crossings or pose a danger to street users
- Operators cover the costs of any additional infrastructure required to facilitate cycle hire

- Any redistribution of hire cycles by vans or other motorised modes are done with zero emission capable vehicles
- Dockless cycle operators actively restrict their users from parking outside designated areas and quickly remove cycles that are parked in these areas
- Cycle hire parking and docking locations and total spaces provided are reviewed and enhanced as demand changes

136. We will work with TfL and London Councils to secure a byelaw that grants local authorities in London regulatory powers to effectively manage current and future cycle hire activities on our streets.

DRAFT

The Square Mile's air and streets are cleaner and quieter

137. By 2044, transport related local air pollution and carbon emissions will have been cut to virtually zero and streets will be quieter more relaxing places. Together with wider action to reduce emissions from buildings and development, this will mean that the City enjoys some of the cleanest urban air in the world. There will be fewer motor vehicles and those remaining will be powered by electricity or other zero emission technologies. Emerging automation technology will reduce speeds and avoid aggressive acceleration and braking, leading to less tyre and brake wear. New approaches to noise management will mean that street works cause less disturbance.
138. Exposure to high concentrations of Nitrogen Dioxide (NO₂) can irritate the airways of the lungs, increasing the symptoms of those suffering from lung diseases. Fine particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases^{xxxiv}.
139. Air quality in the Square Mile does not currently meet the safe limits set by the European Union or World Health Organisation (WHO) for NO₂. Levels of exposure to particle matter (PM10 and PM2.5) are within the UK/EU limit value, however they exceed more stringent WHO standards, and the WHO recognises that there is no safe limit for these types of pollutants^{xxxv}.
140. Road transport is responsible for 26% of NO₂ emissions, 48% of PM10 and 60% of PM2.5, in the Square Mile. Current air quality monitoring records breaches for NO₂ on our busiest streets. In some locations recorded concentrations are twice the safe limit value. Projections show that NO₂ levels will still exceed safe limits on many of our busiest streets after the central London Ultra-Low Emission Zone's (ULEZ) restrictions on the most polluting vehicles come into effect^{xxxvi}. Brake and tyre wear mean that motor vehicles will also continue to be a significant source of particle matter even once the majority of vehicles are zero emission capable.

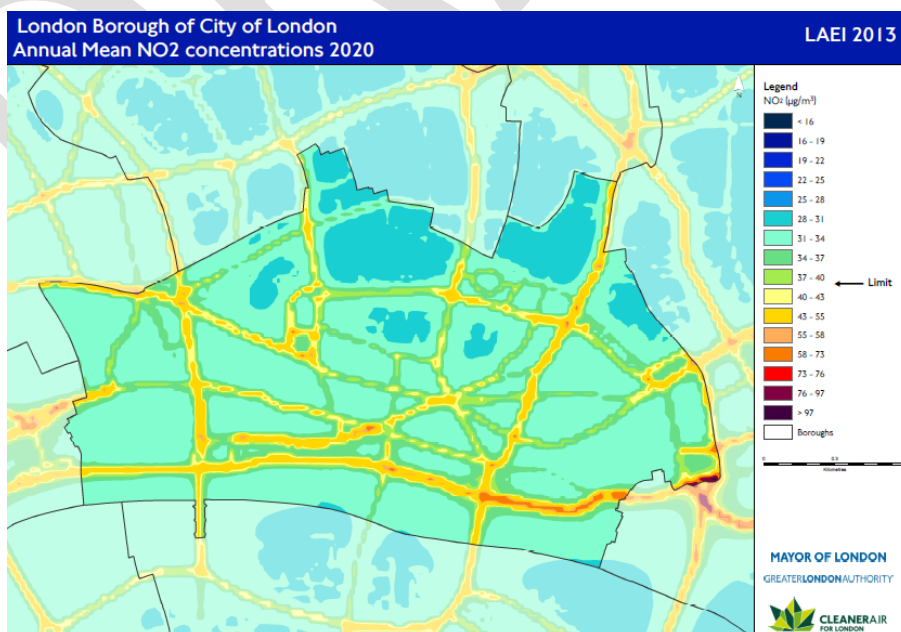


Figure 10: City of London Annual mean NO₂ concentrations 2020 (LAEI 2013)

141. In 2018, 7% of the Square Mile's CO₂ emissions are produced by motor vehicles. The carbon emissions from electric vehicles are dependent on the source of electricity. However, electric vehicles are far more efficient in fuel use/CO₂ output than combustion engines^{xxxvii}. An EU study based on expected performance in 2020 found that an electric car using electricity generated solely by an oil-fired power station would use only two-thirds of the energy of a petrol car travelling the same distance.^{xxxviii}
142. The direct health impacts of noise pollution include sleep disturbance, stress, anxiety, high blood pressure, poor mental health and school performance, and cognitive impairment in children. Risk of cardiovascular disease increases significantly when noise levels exceed 60 decibels, as they often do on urban streets. Noise can also discourage people from walking, cycling and spending time on streets^{xxxix}. 41% of respondents to a recent survey on people's experience and perceptions of noise in the Square Mile cited noise from traffic as a negative factor. Traffic noise was the most significant negative noise or sound identified, followed by noise from construction/building works, which was identified by 12% as an issue^{xl}.

Proposal 29: Support and champion a central London Zero Emission Zone

143. We will support and champion the introduction of a Zero Emission Zone (ZEZ) covering central London within the next Mayoral term.
144. We will seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. This is likely to be achieved through a combination of access restrictions and charging for non-zero emission capable vehicles.
145. If a clear commitment to introduce a central London ZEZ is not set out in the next Mayor's election manifesto, or commitments are insufficiently ambitious, we will explore the feasibility of implementing a City-wide ZEZ, working with London Councils and boroughs neighbouring the City to ensure a coordinated approach.

Local Zero Emission Zones

146. While the Central London ZEZ is being developed we will introduce local ZEZs covering the Barbican and Golden Lane estates and the City Cluster by 2022. Proposals will be developed in consultation with residents and businesses and will reflect the availability of zero emission capable vehicles, while seeking to accelerate their uptake. We will coordinate proposals with TfL, London Councils and London's boroughs to ensure alignment with other existing and planned zero emissions areas and streets.



Figure 11: Proposed Local Zero Emission Zones

Proposal 30: Install additional electric vehicle charging infrastructure

147. We will install additional publicly accessible electric vehicle (EV) rapid charge points by 2025 to support the transition to zero emission capable vehicles, including exploring the potential for a charging hub with priority access for commercial vehicles. We will assess the need for additional charge points for taxis and investigate the charging infrastructure required to encourage a transition to electric powered two wheelers.
148. Locations will be identified through engagement with the TfL EV Infrastructure Taskforce. The first preference will be to install any charge points in car parks or other suitable off-street locations. Where it is essential to locate on-street, charge points will be installed in the carriageway rather than on the pavement
149. Through the planning process we will require the installation of rapid charge points in new developments with off-street loading. We will also encourage the owners, managers and occupiers of existing buildings with loading bays to install rapid charge points.
150. The provision of charging infrastructure will be kept under review to ensure it is sufficient to meet the needs of residents and vehicles serving the City without generating additional traffic. Reviews will also consider the need to update, and potentially reduce, charging infrastructure as battery technology improves.

----- TEXT BOX START -----

Existing electric vehicle charging provision

Fast charge points are currently available in all City Corporation public car parks and in the Barbican residents' car park. We are working in partnership with TfL to deliver a rapid charging hub for taxis in Baynard House car park and a single taxi only rapid charge point on Noble Street.

----- TEXT BOX END -----

Proposal 31: Request an accelerated roll out of zero emission capable buses

151. We will urge TfL to prioritise zero emission capable buses on routes through the Square Mile. We will request that all buses serving the City are zero emission capable by 2030, ahead of TfL's current commitment for all buses to be zero emission or hybrid by 2035.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

152. We will work with the Government, TfL and manufacturers to develop incentive schemes and favourable leasing arrangements that support small businesses in acquiring zero emission capable vehicles. We will consider opportunities, such as preferential pricing for parking/loading for vehicles in this category, to provide time limited incentives to invest in zero emission capable vehicles.

Proposal 33: Make the City of London's own vehicle fleet zero emissions

153. The City Corporation will upgrade its vehicles which operate in the Square Mile to meet the standards we set for local ZEZs. Contractors vehicles that operate within the Square Mile will also be required to meet these standards. Where possible EV charging infrastructure in City Corporation operational sites will be made available to contractors' vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

154. The transition to zero emission capable vehicles and general traffic reduction will help to reduce noise from motor traffic. Other measures to reduce noise will include: well-maintained carriageway surfaces and utility access covers; campaigns to reduce engine idling and the inappropriate use of horns; and working with the emergency services to reduce the use and volume of sirens.
155. We will work with the City of London Police to undertake targeted noise enforcement of motor vehicles that do not comply with legal requirements to maintain an appropriate/type approved exhaust or are not within legal decibel limits for the vehicle type.

Proposal 35: Reduce noise from streetworks

156. The City Corporation will manage and seek to reduce the noise impacts of streetworks through the Code of Practice: Minimising the Environmental Impact of Streetworks. This requires contractors working for the City Corporation and third parties to use the 'best practicable means' to minimise the effects of noise and dust, including:

- Restricting periods of operation of noisy activities
- Undertaking liaison with neighbours
- Using less noisy methods and equipment
- Reducing transmission and propagation of noise, for example by using noise enclosures or barriers
- Managing arrangements including contract management, planning of works, training and supervision of employees to ensure measures are implemented

157. A review of the Code of Practice will be undertaken by 2020 to ensure it reflects best practice, with further updates as required. The review will also consider how we can better work with TfL, utility companies and contractors to improve the level of adherence to the Code.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

158. We will work with the Government, TfL, industry and other partners to encourage the development of innovative solutions to reduce transport related noise and emissions. For example, by supporting trials, sponsoring competitions and awards, and hosting conferences and seminars.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

159. The City's street cleansing regime will ensure all walking routes, cycle routes and public realm areas are cleaned to a high standard and kept free of litter.

160. We will reduce litter from smoking, working with Public Health to support campaigns and initiatives to stop smoking and, if necessary, prosecuting offenders.

161. We will continue to work with businesses to minimise the impact of waste collection on the public realm, including through time banded collections that restrict the times when rubbish and recycling can be left on the street.

Delivery and servicing needs are met more efficiently, and impacts are minimised

162. Deliveries and servicing are an essential part of a thriving business district. Delivering this Strategy will ensure these needs are met by fewer, quieter, safer and cleaner lorries and vans. Deliveries for buildings or areas of the City will be grouped together at consolidation centres, meaning fewer, fuller lorries and vans. The lorries and vans making these deliveries will use the return journey to transport waste and recycling. The Thames will also carry goods into the City as well as waste out, including the materials needed for construction projects. Logistics hubs within the City will enable deliveries to be made by cargo cycles and pedestrian porters. Cargo cycles will also be used for servicing businesses and buildings, with tools and parts securely stored at locations within the Square Mile. New technologies will help improve the routing of deliveries and make it easier to find a place to park or unload.
163. Freight and servicing vehicles make up 25% of motorised traffic in the Square Mile. This proportion increases to 32% between 7am and 10am, coinciding with the busiest times of day for walking and cycling. 40% of respondents to the City Streets survey felt that the number of lorries and vans on the City's streets is too high, the second highest response after private cars^{xli}.
164. Even after the Ultra-low Emission Zone for central London comes into effect freight and servicing activities are still expected to contribute 26% of transport related NOx and 28% of PM2.5 emissions from motor vehicles^{xlii}.
165. Large goods vehicles make up only 4% of vehicles on the City's streets. However, 38% of collisions that result in someone being killed involved a large goods vehicle as do 21% that result in a serious injury.

Proposal 38: Reduce the number of freight vehicles in the Square Mile

166. We will seek to reduce the number of motorised freight vehicles in the Square Mile by 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.
167. To achieve this target, we will work with businesses, suppliers, the freight industry and other relevant partners to deliver an integrated freight programme that incorporates retiming, consolidation, last mile logistics, construction logistics, better use of the river and smarter procurement practices.

Retiming deliveries

168. We will explore the potential for area and City-wide timed access and loading restrictions for motorised freight vehicles. Our aim is to reduce the number of these vehicles on our streets in the peak periods by 50% by 2030 and by 90% by 2044, while ensuring businesses and residents can still receive essential deliveries.
169. Measures to encourage retiming will include:
- Permitting night-time deliveries where there will be negligible impact on residents both en route and in the City. Through the planning process we will ensure all appropriate new developments have restrictions to limit deliveries between 7am-10am, 12pm-2pm and 4pm-7pm

- Engaging with property managers, occupiers and businesses which may wish to retime deliveries and seeking to remove any restrictions in their planning consents where there will be negligible impact on residents
- Integrating out of peak deliveries as part of the sustainable logistics programme and identify opportunities for retiming freight on an area basis within Healthy Streets Plans (see Proposal 12)
- Working with London Councils, TfL and neighbouring local authorities to modernise the London Lorry Control Scheme (LLCS) to generate more opportunities for out of peak and night time deliveries.

Consolidation

170. Using established best practice, we will work with a partner haulier to provide a consolidation service for the Square Mile by 2022. A major engagement exercise with City businesses will promote and encourage the use of this consolidation service. This will include developing a consolidation toolkit for City businesses, informed by monitoring of the benefits arising from consolidating deliveries to the Guildhall complex.
171. We will also continue to use the planning process to require all new major developments to use a consolidation service to reduce deliveries to their buildings.
172. In the longer term we will develop a commercially sustainable approach to consolidation for the Square Mile and establish a sustainable logistics centre to serve the City by 2030. This centre will co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriership services.

Last mile logistic hubs

173. We will enable more deliveries within the Square Mile to be made by cargo cycles, on foot and by small electric vehicles by:
- Delivering two last mile logistic hubs in underutilised City Corporation assets by 2022. A further three hubs will be delivered by 2025.
 - Establishing additional last mile logistics hubs if appropriate underutilised assets are identified.
 - Exploring opportunities to acquire new sites within or adjacent to the Square Mile for last mile logistic hubs.
 - Working with developers and land owners to integrate last mile logistic hubs as part of major City developments.

Increase the use of the River Thames for freight

174. We will maximise the potential to use the Thames for the movement of freight by:
- Maintaining the commercial waste operation at Walbrook Wharf and supporting additional waste carried through the Wharf
 - Identifying opportunities to increase the use of the river for freight deliveries to the Square Mile
 - Working closely with Thames Tideway to identify future opportunities for their wharves and barges once construction is completed.
 - Working with river freight operators to ensure that their fleets meet Port of London Authority air quality standards
 - Exploring the use of Blackfriars and Tower Piers and a reinstated Swan Lane Pier as points to transfer freight for last mile delivery on foot or by cargo cycle.

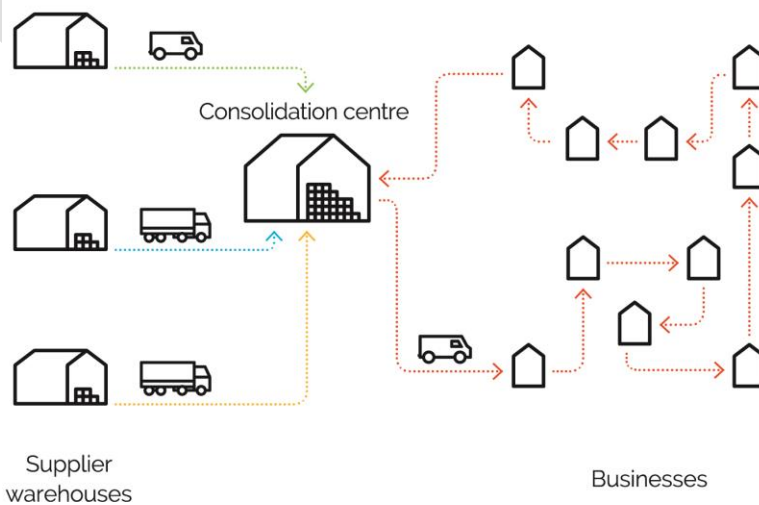
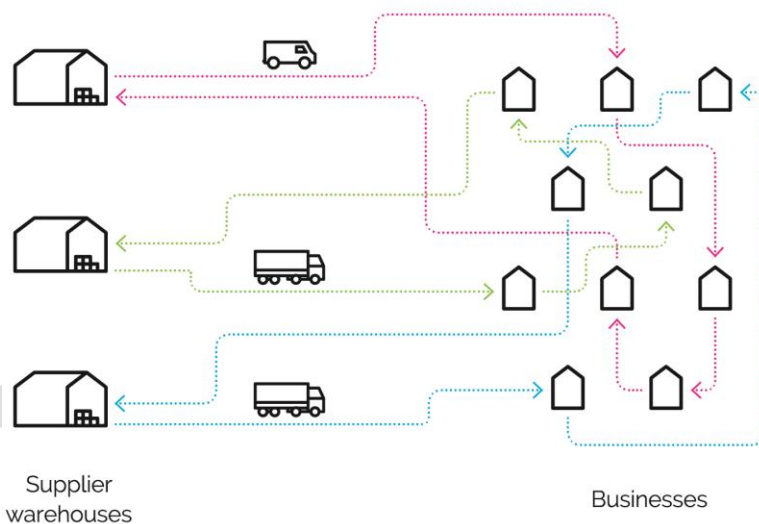
Freight consolidation

Freight consolidation involves routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery. This approach means that the final stage of delivery is made by fewer, fuller vehicles, significantly reducing the number of lorries and vans making deliveries.

Case studies have shown that freight consolidation can reduce the number of delivery trips by 46 – 80%^{xliii}. Enabling freight consolidation is critical to achieving our targets for reducing freight vehicles.

Examples of this consolidation include the Bristol and Bath Consolidation Centre, the London Borough Consolidation Centre and Regent Street Clipper Consolidation. The City Corporation already mandates the use of consolidation centres in planning consents, including 22 Bishopsgate and 1 Undershaft, to mitigate the impact of new development on City streets.

How freight consolidation works



Reducing the impact of construction logistics

175. To facilitate future development while minimising the impact of construction logistics, we will:

- Work with TfL to update Construction Logistics Plan guidance by 2022. This updated guidance will include stricter expectations for construction consolidation and on-site waste compaction. It will also review the potential for emerging technology, such as 3D printing or higher payload and carrying potential of new rigid axle vehicles to reduce the number of deliveries.
- Work with developers and contractors to adapt and develop construction delivery management systems to facilitate retiming of deliveries to outside the 7-10am peak.
- Through the planning process, all development within the City must consider use of the River Thames for the movement of construction materials and waste.

Procurement and personal deliveries

176. To encourage smarter commercial decision making for our businesses and influence how residents and workers get goods delivered, we will:

- Share information on the impact of personal deliveries on traffic in the City, including air quality and road danger and promote the use of click and collect services.
- Establish a collaborative procurement programme for the Square Mile by 2022. This will allow businesses, particularly small and medium sized businesses, to share suppliers and waste services. We will work with Cheapside Business Alliance and the Aldgate Partnership to trial the programme prior to a City-wide roll out.
- Identify opportunities for other City Corporation initiatives, such as Plastic Free City and our Responsible Business Strategy, to support efforts to reduce the number of deliveries and waste collections

Proposal 39: Develop a sustainable servicing programme

177. We will work with servicing businesses and facility and property managers to develop a Servicing Action Plan, to be published by 2022. This will identify opportunities to reduce the number of vans and other service vehicles in the Square Mile while seeking to improve response times and quality of service. We will also explore the potential to provide secure storage space for tools and materials as part of last mile delivery hubs to reduce the need for engineers to travel to and around the Square Mile by van.

Our street network is resilient to changing circumstances

178. It is inevitable that people using our streets and transport networks will experience occasional disruption. This includes disruption caused by construction and streetworks, breakdowns and severe weather. By delivering this Strategy we will ensure that these disruptions have as little impact on the ease and experience of travelling in the City as possible. Streets will be kept open to people walking and cycling during construction and streetworks. Long-term works that require streets to be closed to traffic will provide an opportunity for people to enjoy the benefits of a traffic-free environment, and to assess the potential for permanent change. When necessary, alternative routes will be made available for motor traffic on streets that are normally only used for access. The Square Mile will be prepared for the impacts of a changing climate or more extreme weather events; enabling people to comfortably use the City streets regardless of the weather.
179. Every year the City Corporation receives around 9,500 applications for permits to work on the highway, approximately half of these are from utility companies, and half for street maintenance and improvements. 85% of these applications are approved. In 2015/16 combining streetworks through collaborative working 'saved' 763 excavation days. Using TfL's calculation on the economic benefit to London as a result of days of disruption saved, the estimated saving for the Square Mile is in the region on £1.1m based on an average benefit of £1,500 per day.^{xiv}
180. Extreme weather events, including higher rainfall and temperatures, are increasing as a result of a changing climate.^{xiv} Further details of the likely impacts of climate change on transport in the Square Mile will be included in the final version of this Strategy, following publication of the Met Office's Climate 2018 projections in November 2018.

Proposal 40: Allow some Local Access streets to function as City Access streets during significant disruption

181. We will maintain a primary 'resilience network' for motor vehicles that can be 'switched on' in response to significant planned or unplanned disruption. Local Access streets on the resilience network will be designed to allow temporary reopening to through traffic or occasionally accommodate higher volumes of motor vehicles. This approach will also ensure that emergency services can use these streets when necessary.
182. Appropriate management arrangements will ensure streets remain safe for all users, such as a clear demarcation of pedestrian space, lower speed limits and marshalling. We will explore the use of technology for advance messaging both on-street for all users and through in-vehicle navigation systems to communicate and manage changing or temporary arrangements.

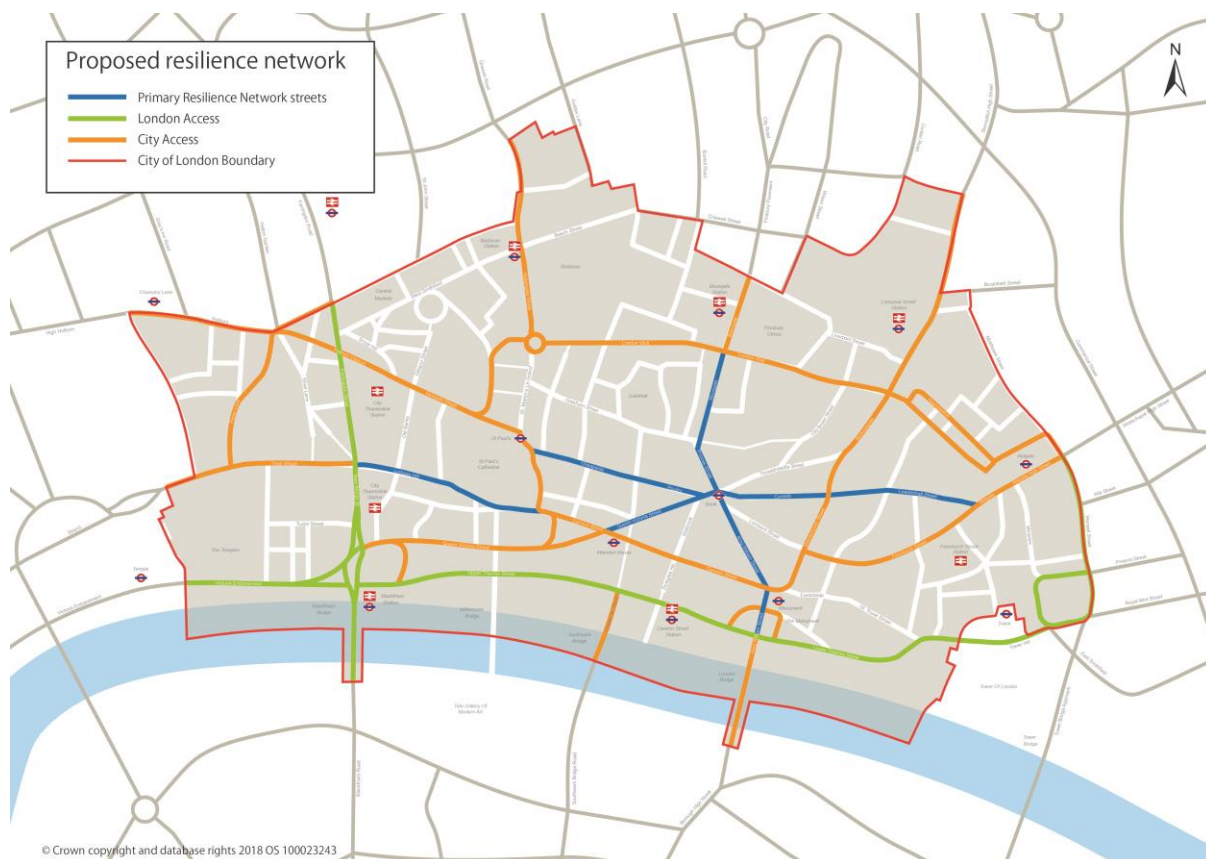


Figure 12: Proposed primary resilience network

Proposal 41: Reduce the impact of construction and streetworks

183. The needs of people walking will be prioritised during streetworks and construction, with the aim of maintaining a comfortable and accessible walking route on both sides of the street, with space reallocated from general traffic as necessary. Accessible diversions must be provided if space constraints do not allow an acceptable level of temporary provision.

184. We will work with utility companies, contractors and developers to minimise the impact of construction and streetworks on people walking and cycling. Traffic management plans for construction sites and streetworks will maintain access for different users in accordance with the following hierarchy:

- Walking
- Cycling and buses
- Taxis
- General traffic

185. We have a Network Management Duty which requires us to ensure we apply best practice to managing streetworks. We will review this in 2019 and on a regular basis to ensure our activity and processes remain up to date and effective.

186. Within the context of the Network Management Duty, we will encourage the drafting of legislation to allow penalties to be charged against developments that overrun their agreed licence periods for scaffolds and hoardings.

187. We will review the City's Guidance Notes for Activities on the Public Highway in 2019 to ensure that guidance is in line with best practice and the requirements outlined above. A review will include considering the opportunity to introduce lane rental controls on our major streets to further reduce the impact of street works.

188. We will seek to minimise disruption caused by streetworks by:

- Encouraging collaborative working and coordinating street works
- Exploring the potential for new technology to reduce noise and the extent of works and speed up delivery
- Reducing the duration of works by allowing extended and night-time working where noise considerations allow
- Improving signage and permit information, to include contact details, purpose of works and other information such as reason for site inactivity
- Improving communication through better engagement with businesses and residents for longer duration works
- Work with TfL to improve communication on the impact of streetworks and other maintenance on public transport services
- We will work with TfL to explore the potential to further adjust traffic signal timings to reflect actual and modelled traffic flows during periods of network disruption. We will also explore new adaptive traffic control technologies as they emerge through our Future Transport Programme (Proposal 43)

189. We will use medium and long-term street closures as an opportunity to open streets to people, for example working with businesses to provide temporary seating or programmed events. We will also monitor the traffic impacts of long-term street works to inform transport and resilience planning and assess the potential for retaining capacity reductions or access restrictions.

Proposal 42: Make the street network resilient to severe weather events

190. We will work with the London Climate Change Partnership Transport Adaptation Sector Group (TASG) to ensure the street network and transport system remains open during severe weather events. With TASG, we will undertake risk assessments based on current and predicted impacts of climate change and develop mitigating measures that will be implemented when thresholds are reached, including temperature change or levels of rainfall. This process will ensure the City Corporation and TfL are prepared to respond to extreme weather events that may affect our streets, the TLRN and rail and Underground networks.

191. The initial programme for the TASG first stage assessment is set out below. Further detailed assessments and mitigation plans will be informed by the Met Office's 2018 Climate projections, which will be released in November 2018.

- Agree indicators and complete transport sector assessments (autumn/winter 2018)
- Publish assessments (late 2018)
- Review and update every two years

192. Highway management regimes, including the Winter Service Plan^{xlvi} (updated annually), will consider walking, cycling and motor vehicle routes as equally important. Priority 1 footpaths and cycle routes will be treated for snow and ice at the same time as priority 1 streets.

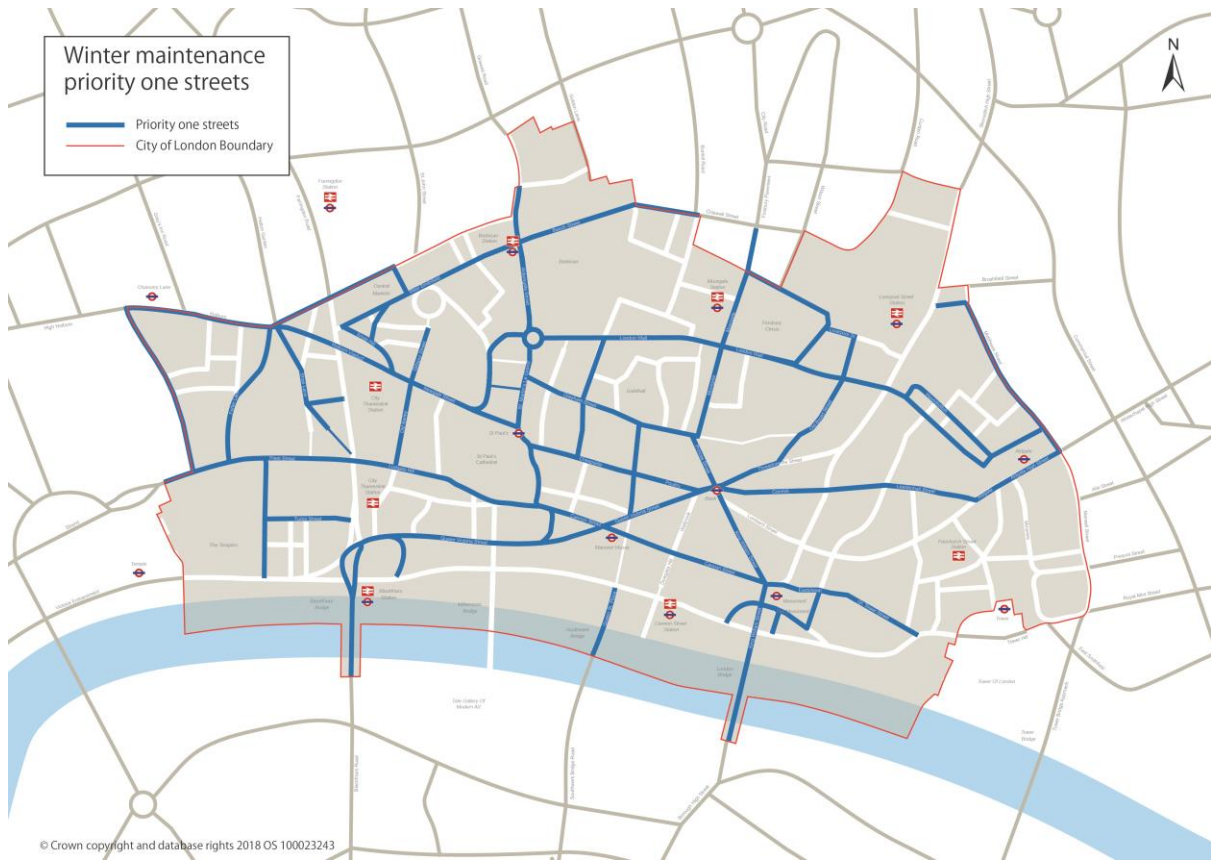


Figure 13: Winter maintenance priority one streets [MAP TO BE UPDATED]

Emerging transport technologies benefit the Square Mile

193. The advent of new transport technology innovations, such as autonomous vehicles (AVs) and new apps and services, promise to change the way our streets function and the way we choose to travel on them. Delivering this Strategy will ensure that transport innovations are seamlessly integrated into the fabric of the City and improve the experience of travelling and spending time on the Square Mile's streets. A proactive rather than reactive approach to policy making will ensure appropriate policy and legislation is in place while supporting and accelerating beneficial innovations. The City will be a test-bed for urban transport innovations and seen as a world leader in improving people's personal mobility and livelihoods through new technologies.

194. Close to £1 billion is being spent on AV development in the UK alone^{xlvii} and industry experts (alongside the UK's Chancellor Phillip Hammond) are now suggesting that self-driving cars will be running on our streets in less than four years^{xlviii}. Transport Systems Catapult forecasts that a quarter of global new vehicle sales in 2035 will be AVs. Disruptive technologies, such as Uber, have already demonstrated their ability to rapidly change how people travel. They have also highlighted the potential negative impacts of these changes, leading to more motor vehicles on London's streets. While no one is certain of what the future holds the City must be ready to respond to support the successful implementation of this Strategy.

Proposal 43: Establish a Future Transport Programme

195. We will establish a Future Transport Programme to work with developers of mobility innovations. This programme will:

- Engage with industry, academia, government Catapults and partners to deliver transport innovation and technology trials across the City, including trials on:
 - App-based parking and un/loading permitting and enforcement
 - Technology-assisted kerbside space reallocation
 - On-demand accessible shuttles and shared transport services
 - App-assisted pedestrian crossing technologies for the partially sighted and people who require more time to cross
 - Geofencing and permitting
 - Use of drones to support the emergency services and make urgent deliveries to hospitals
 - Technology to support the delivery of Vision Zero by reducing the likelihood and severity of collisions
- Identify measures required to support the uptake of appropriate mobility solutions, such as off-street storage of shared autonomous vehicles
- Host conferences and seminars and support competitions and awards for transport innovations and technologies
- Explore the potential for commercial opportunities and partnerships within the transport technology and innovation industry.

196. A more detailed programme of activities will be developed shortly after the publication of the Transport Strategy and in consultation with the Future Transport Advisory Board (Proposal 44).
197. We recognise the significant potential for new technologies to improve the City's streets and will openly enter into discussion with any innovators. Future transport innovations will be considered appropriate for trial and use in the City context if they support the delivery of Healthy Streets and adhere to the following requirements (when applicable):
1. Support priority for people walking and efforts to enable more people to choose to walk and cycle, and not shift people from sustainable travel modes to unsustainable travel modes
 2. Contribute to efforts to reduce motor vehicle volumes and mileage and not increase motor traffic volumes
 3. Lead to an overall increase in vehicle occupancy and loading
 4. Help make our streets safer and not increase road danger, collision rates, collision severity, terrorism risk, or the need for additional policing or enforcement
 5. Reduce vehicle speeds and ensure vehicles travel at speeds appropriate to conditions and the City context
 6. Minimise obstructions to vehicles and people walking, and not permanently obstruct pavements or add clutter
 7. Improve the efficiency of kerbside use and not increase parking or loading space requirements
 8. Help spread travel demand, for both people and goods, more evenly across the day, such as outside morning, lunchtime and evening peaks and overnight
 9. Help make streets and the City's air cleaner and quieter by reducing transport related emissions and noise
 10. Improve the experience of using the City's streets and open spaces and support efforts to increase the amount of public space
198. Additional requirements apply to the introduction of connected and autonomous vehicles, drones and droids on our streets.
- *Connected and autonomous vehicles* must not require any changes or infrastructure that have a negative impact on our streets, such as bollards or barriers
 - *Drones* must not operate without CAA and City of London permission
 - *Droids* must not operate on pavements or in such a way as to obstruct or pose a danger to any user of our streets
199. Developers and operators of new transport innovations and services are expected to:
- Share all beneficial data generated or collected with the City Corporation to aid in policy and decision making
 - Not discriminate against any potential user, either through active discrimination or through profiling or algorithmic/AI discrimination or bias
 - Accommodate every user, especially those requiring wheelchairs or mobility aids when innovations and technologies incorporate motor vehicles
 - Not generate any unreasonable additional costs for the City Corporation or users
 - Ensure any supporting digital software and hardware is sufficiently and rigorously safeguarded from malicious use or intent that could pose a risk to physical or digital safety in the City

- Readily and proactively engage with the City and regularly inform them of their activities and plans

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Emerging transport technologies

Connected and autonomous vehicles, also known as driverless cars or CAVS, are vehicles equipped with sensors and on-board computers that allow them to effectively drive themselves. There are many levels of automation, from partial automation, which can include self-parking cars and adaptive cruise control, to full automation and a hands-off driving experience. The autonomous operation of motor vehicles on our streets could significantly reduce road danger and improve traffic flow.

Drones, also known as unmanned aerial vehicles or UAVs, are small flying vehicles which rely on remote-controlled piloting or fly using onboard sensors and GPS. The operation of drones in the City could improve delivery times of sensitive or high-value goods such as medical supplies and may aid in asset inspection, construction site monitoring, and emergency services activities.

Droids are small wheeled vehicles that are controlled by remote-controlled piloting or onboard sensors and GPS. The use of droids in the City could include couriership and deliveries.

Shared mobility services are transport services that share the use of a vehicle for personal travel, examples include ridesharing and pooled rides.

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Proposal 44: Establish a Future Transport Advisory Board

200. To ensure that we can identify and proactively respond to future transport innovations we will engage with industry partners, experts, and academics through a Future Transport Advisory Board. The Future Transport Advisory Board will meet twice a year to:

- Support and advise on the activities of the Future Transport Programme.
- Advise on emerging transport technology and innovation industry trends, and suitable responses to them
- Act as a sounding board on the City's approach to managing upcoming innovations and technological launches
- Review the City's future mobility policies, positions, and trials
- Help facilitate connections and relationships between City officials and the wider transport technology industry

Proposal 45: Explore the need for legislative change to ensure emerging technology and innovation benefits the Square Mile

201. We will support and engage with all levels of government, industry and sector representatives to develop frameworks and legislation for future transport and ensure overall positive outcomes for the Square Mile, London and other cities. Initially we will seek local and national legislative action on:

- Licensing for the semi and fully-autonomous vehicle market, alongside the development of safety, design, digital security, and supporting infrastructure regulations
- Strengthening existing Civil Aviation Authority regulations on small remotely-piloted aircraft and drones
- Clarifying the operating parameters of droids and other small autonomous vehicles
- Regulating the dockless cycle hire industry, as outlined in Proposal 28

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The Square Mile benefits from better transport connections

202. Public transport will remain the main way that people travel to the Square Mile and continued investment will ensure that the City remains one of the most well-connected business districts in the world. Public transport will provide efficient and direct 24-hour connectivity to major local, regional, national, and international destinations. The building of new rail and underground connections, including Crossrail 2 and High-Speed 2, will provide the additional capacity people need to get to the City quickly and comfortably from across Greater London and the UK. Expanded Night Tube and 24-hour bus networks will serve and grow the City's thriving cultural offer and night-time economy.

203. The recent economic success of the City and London in general is attracting more jobs and residents than ever before to greater London and the surrounding region. The Mayor and TfL have laid out ambitious plans for expanding the Capital's public transport networks to address the additional pressures this growth will place on these services. Planned network improvements are forecasted to increase the number of people within a 60-minute commute of the City by nearly two million^{xlix}. Modelling projections suggest that, without further investment, Londoners will still be faced with deteriorating network conditions over the next 25 years. TfL forecasts an increase in travel by all rail modes of 50% by 2041^l. Delays from overcrowding on the underground have tripled in the past five years and 8 of the 10 most overcrowded rail services across the UK are now in London^{li}.

Proposal 46: Support and champion better national and international connections to the Square Mile

204. We will work with the Mayor of London, TfL, the Government, airport and rail operators and other related partners to improve national and international connectivity to the City, including through supporting:

- Increased airport capacity in the South East, recognising that this will most efficiently be delivered through a third runway at Heathrow to be delivered as soon as possible.
- Improved connectivity to London's airports through:
 - Increased capacity and additional frequency on the West Anglia Main Line to Stansted Airport
 - A new Crossrail station at City Airport, constructed at the same time as the delivery of the Ebbsfleet extension
 - Increased DLR frequency to City Airport
- The delivery of High Speed 2 as quickly as reasonably possible
- Improved national rail access to London, including electrification, station expansions and general service improvements

Proposal 47: Support and champion improved connections to the Square Mile from Greater London and the surrounding region

205. We will work with the Mayor of London, TfL, Government, boroughs neighbouring the City and other related partners to improve regional connectivity to the Square Mile, including through supporting:

- Devolution of suburban rail service franchising to TfL, with a view to providing a London Suburban Metro service by 2030
- Accessibility improvements to rail and Underground stations in the Square Mile, as outlined in Proposal 19
- Extending the Overground to Barking Riverside
- The delivery of Crossrail 2 as soon as reasonably possible
- Enhancing the coverage and frequency of 24-hour public transport services in central London, including increasing the number of lines operating night-tube services, enhancing the 24-hour bus network, and improving night-time DLR and rail operations, including Crossrail. Any extensions to operating hours must take account of the need to minimise noise and other impacts on residents.
- Enhanced 24-hour bus services to/from the City
- Improvements to Liverpool Street Rail and Bus Station, including enhancing step free access and improving entry points
- Exploring the feasibility of Sunday operation of the Waterloo and City Line
- Immediate improvements to street-level interchange between Fenchurch Street and Tower Hill, Tower Gateway and Aldgate stations, including wayfinding. Exploration of the feasibility of a direct interchange route between Fenchurch Street and Tower Gateway and Tower Hill
- Access and capacity improvements at Aldgate Station and exploration of the feasibility of a direct interchange between Aldgate and Aldgate East stations.
- Extending the Metropolitan Line to Watford Junction and the Bakerloo Line to Lewisham
- The delivery of more high-quality cycling routes to and through central London including Quietways and Cycle Superhighways
- Improved walking connections to boroughs neighbouring the City

Proposal 48: Support the increased use of the Thames for passenger services

206. We will work with partners including TfL River Services, the Port of London Authority and riverboat operators to increase the use of the River Thames for passenger services. Activities will include promotion of river services, enhancing walking routes to Blackfriars and Tower piers and improving overall pier efficiency. We will explore the potential to reinstate Swan Lane pier for leisure and passenger services.

Proposal 49: Review bus provision across the City

207. We will support TfL's ambitions to adjust bus services in Central London, taking account of the forecast fall in demand following the opening of the Elizabeth Line.

208. We will work with TfL to improve bus journey times to and connectivity through the Square Mile by:

- Reviewing bus routing and frequency throughout the City to optimise routing
- Introducing targeted junction improvements to enhance bus priority
- Identifying opportunities to improve bus priority when developing and implementing Traffic Management and Healthy Streets plans (see Proposal 12) and major projects

209. The key routes for bus priority measures are shown in figure XX. Improvements to these routes will be delivered by 2030.

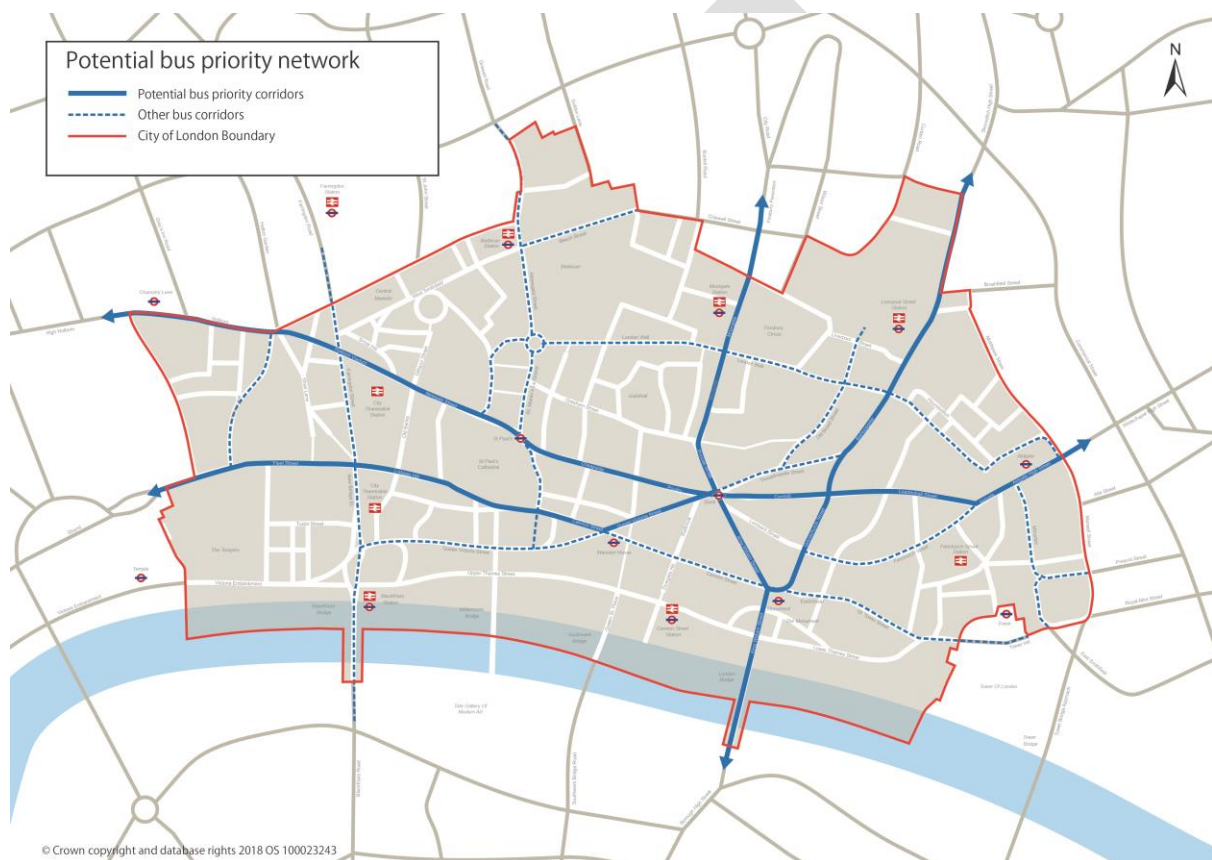


Figure 14: Potential bus priority network

Proposal 50: Support the Mayor of London in retaining locally-generated taxation

210. We will support the Mayor of London and TfL's efforts to retain additional locally-generated taxation, such as vehicle excise duty, to fund investment in transport infrastructure across the Capital, including investment to help deliver the outcomes of this Strategy.

Proposal 51: Encourage continued Government investment in major London transport projects

211. We will continue to encourage the Government to invest directly in strategic Healthy Streets projects and programmes and large transport infrastructure projects, such as Crossrail 2. Significant investment across Greater London is required to ensure the Capital remains an attractive place to live, work, study and invest and protect the significant contribution London makes to the national economy.

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Delivering the Strategy

Projects and programmes

212. The major projects and programmes that will be delivered by the Transport Strategy are summarised below. Further details on the projects that will be delivered in the first three years will be set out in the Transport Strategy Delivery Plan, which will be published alongside the final version of this Transport Strategy.

Project	2022	2025	2030	2040	2044	Key area of change
City-wide 15mph speed limit						
Legible London roll out						
Kerbside uses review						
Lunchtime Streets						
Last-mile delivery hubs						
Streets Accessibility Programme						
Sustainable logistics centre						
Road Danger reduction priority schemes						
Pedestrian Priority/Healthy streets projects						
Road Danger Reduction campaigns						
Location specific						
City Cluster Zero Emission Zone						City Cluster
Barbican and Golden Lane Zero Emission Zone						Smithfield and Barbican
Core cycle network Phase 1						City Cluster; Smithfield and Barbican; Liverpool St.
Core cycle network Phase 2						Fleet St; Smithfield and Barbican
Bank Junction area						
Moorgate area						Moorgate and Liverpool Street
Culture Mile						Smithfield and Barbican
Museum of London roundabout, St Paul's gyratory						Smithfield and Barbican
City Cluster area strategy						City Cluster
Fleet Street & Courts Area						Fleet Street

Table 1: Key projects and programmes

Managing delivery

213. Further details on the actions and programmes to deliver elements of this Strategy will be set out in a series of reviews and delivery plans, including:

- The Transport Strategy Delivery Plan, a rolling three-year delivery plan that will be updated on an annual basis
- Healthy Streets Plans, providing details of how we will manage the street network in areas the City in accordance with our proposed Street Hierarchy (Proposal 12)
- A City-wide kerbside review to better understand and manage kerbside activities on our streets (Proposal 14)
- Streets Accessibility Delivery Plan, which will set out the timetable for delivering necessary improvements needed to meet the proposed COLSAS standards (Proposal 16)
- Road Danger Reduction Action Plan, a five-year delivery plan for measures to achieve Vision Zero and implement the Safe Systems approach (Proposal 20)
- Servicing Action Plan, which will identify opportunities to reduce the number of vans and other motorised service vehicles in the Square Mile (Proposal 39)
- Future Transport Action Plan, assessing and identifying opportunities to support transport technologies that will help deliver this Strategy (Proposal 43)
- The City Corporation's Local Implementation Plan, a three-year delivery plan for the Transport Strategy

214. We will continue to engage and consult with City residents, workers, businesses and other relevant street users and partner organisations as we develop and deliver this Strategy. Any projects that will lead to significant and permanent changes to the form or function of our street network will also undergo transport and traffic modelling. Impact assessments, including Environmental Impact Assessments and Equality Impact Assessments, will be conducted for all relevant projects and proposals. These will test options and ensure potential benefits are maximised and any potential negative impacts are identified and mitigated. Modelling and assessments will consider potential impacts beyond the Square Mile.

Proposal 52: Using temporary interventions and trials to accelerate the pace of delivery

215. Delivering changes to our streets can take time. We will use temporary and experimental measures to quickly deliver functional changes to our streets and allow people to begin enjoying the benefits of change as we work towards full delivery. If appropriate, will also use temporary interventions to 'live trial' major change, allowing proposal to be tested and, where necessary, refined. This approach will allow people to better understand the nature of proposed changes and provide feedback based on real experience.

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Examples of temporary change (photos with captions)

Bank on Safety

Tavistock Place, Camden

Shoreditch parklet, Hackney

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Funding delivery

216. The delivery of this Transport Strategy will be funded from a range of sources, including:

- Money received from TfL, including:
 - LIP Corridors and Neighbourhoods – an annual allocation that contributes to projects identified in our LIP
 - Liveable Neighbourhoods – funding for large projects that encourage walking, cycling and the use of public transport, allocated through a bidding process
 - Strategic funding – funding for specific priorities or initiatives, such as cycling infrastructure, air quality improvements and bus priority
- The City Corporation's on-street parking reserve – reinvesting revenue from parking charges and penalty charge notices
- Contributions from developers through the Community Infrastructure Levy, Section 106 and Section 278

217. The long-term nature of this Strategy means we have not scoped the full cost for all projects and programmes outlined above. However, a core principle will be to generate the necessary revenue/funding to make the delivery of this Strategy largely self-supporting.

Measuring and reporting progress

218. Progress on delivering this Strategy will be publicly reported to the City Corporation's Planning and Transportation Committee on an annual basis from March 2020. Every two years we will publish a City Streets Report which will include data on our targets set out in Table 2, the key performance indicators set out in Table 3, and analysis of traffic trends based on our biennial vehicular and pedestrian traffic counts.

Proposal 53: Improve our monitoring of transport in the Square Mile

219. We will improve the quantity and quality of data we hold on transport in the City by:

- Exploring the potential to improve our City-wide database of vehicular and pedestrian traffic counts by increasing count locations and the number of count days
- Repeating the City Streets survey every two years to understand what people who live and work in, or travel through the Square Mile think about transport and streets in the City
- Exploring the potential to gather ongoing feedback through web or app-based surveys and interactive maps

- Making best use of technological advancements in sensors and other monitoring methods to improve both the quality and the quantity of data we collect, reduce of the cost of data collection, and increase the speed of data processing
- Sharing data with other organisations that collect metrics on relevant indicators

220. Some of the data used for monitoring and evaluating the Strategy will be provided by outside organisations. We will engage with these data owners and sources to review our targets and performance indicators as new datasets become available, and work with them to obtain data and information that is appropriate, up to date, and reliable.

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Table 2: Key targets

Metric	Baseline (if known)	2030 Target	2044 Target
Reduction in motor vehicle traffic (counted in our traffic composition survey counts)	185k	-25%	-50%
People rating experience of walking in the City as pleasant	10%	--	75%
Number of kilometres of pedestrian priority streets	25km	35km	50% of all streets
Number of people killed and seriously injured on our streets	54 KSIs	<16 KSIs	0 KSIs
People rating experience of cycling in the City as pleasant	4%	--	75%
Increase in the number of people cycling (counted in our traffic composition survey counts)	44k	+50%	+100%
Reduction in motorised freight vehicle volumes (counted in our traffic composition survey counts)	39k	--	-30%
Reduction in motorised freight vehicle volumes during peak periods (counted in our traffic composition survey counts)	18k	-50%	-90%

Table 3: Additional key performance indicators

Indicator	Baseline data source	Data collection method
<i>The City's streets are great places to walk and spend time</i>		
Key target: People rating experience of walking in the City as <i>pleasant</i>	City Streets Survey	City-wide public survey
People rating pedestrians on our streets as being <i>prioritised</i>	City Streets Survey	City-wide public survey
People rating the space given to pedestrians on our streets as <i>adequate</i>	City Streets Survey	City-wide public survey
Key target: Number of kilometres of pedestrian priority streets	Current City of London street network	GIS surveying and Upgraded TCS
Pavements with Pedestrian Comfort Level of B+	City Pedestrian Model output	GIS surveying
Number of crossings with 60 second cycle times	Transport for London	Transport for London
<i>Street space is used more efficiently and effectively</i>		
Key target: Reduction in motor vehicle traffic	Traffic Composition Survey	Traffic Composition Survey/Upgraded TCS/Congestion charging

<i>The Square Mile is accessible to all</i>		
Number of streets not meeting COLSAS minimum standard	---	Annual review
Number of streets not meeting COLSAS desired standard	---	Annual review
<i>People using our streets and public spaces are safe and feel safe</i>		
People rating experience of safety from crime and terrorism as <i>safe</i>	City Streets Survey	City-wide public survey
Number of people slightly hurt in a collision	ACCSTATS/STATS19	---
Key target: Number of people killed and seriously injured in a collision	ACCSTATS/STATS19	---
<i>More people choose to cycle in the City</i>		
People rating experience of cycling in the City as <i>safe</i>	City Streets Survey	City-wide public survey
Key target: People rating experience of cycling in the City as <i>pleasant</i>	City Streets Survey	City-wide public survey
Key target: Increase in cycling traffic	Traffic Composition Survey	Traffic Composition Survey/Upgraded TCS/Congestion charging

Gender ratio in cycling traffic	---	City-wide public survey
<i>The City's air and streets are cleaner and quieter</i>		
NO _x , PM ₁₀ , PM _{2.5} , levels and limit breaches	LAEI & CoL monitoring sites	---
<i>Delivery and servicing needs are met more efficiently, and impacts are minimised</i>		
Key target: Reduction in freight and servicing vehicle traffic	Traffic Composition Survey	Traffic Composition Survey/Upgraded TCS/Congestion charging
Key target: Proportion of freight traffic operating outside peak hours	Traffic Composition Survey	Traffic Composition Survey/Upgraded TCS/Congestion charging
<i>Our street network is resilient to changing circumstances</i>		
Number of days saved from joined-up roadworks	City of London Highways Monitoring	---
<i>Emerging transport technologies benefit the Square Mile</i>		
Number of future transport trials and joint projects initiated	---	Annual reporting

Partnerships and leadership

221. We recognise that we cannot deliver this Strategy on our own and will work with a range of partners to achieve the vision, aims and outcomes for streets and transport in the Square Mile. This will include working in partnership with:

- City residents and residents' associations
- City businesses and institutions
- The City of London Police
- The Mayor of London and TfL
- London Councils and London's boroughs
- Property developers and the construction industry
- National rail and river service operators
- Transport industry and representative bodies
- Campaign organisations and special interest groups
- Developers of new transport technologies

222. We recognise that our unique position as a global financial district allows us to be particularly bold in our proposals for changing and improving streets and transport. Nevertheless, the lessons we will learn from delivering this Strategy may be insightful and relevant to London's boroughs and other cities and transport authorities. Likewise, we can learn from and be inspired by the experiences of others.

223. We will share our experiences and identify transferable best practice by:

- Hosting and contributing to conferences, seminars and other events that highlight and discuss best practice
- Networking and developing knowledge-sharing relationships with London's boroughs to capture lessons learnt from the development and delivery of this strategy
- Establishing and maintaining relationships with other cities, both in the UK and internationally, and participating in local, national and international networks.
- Sharing knowledge with relevant private sector, academic and third sector organisations

Proposal 54: Support change across London that is aligned with this Strategy

224. The Square Mile does not exist in isolation and change across the Capital is required to maintain City's attractiveness as a place to live, work, learn and visit. We will support projects and initiatives delivered by TfL and London's boroughs that align with the vision, aims and outcomes of this Strategy. We will also support changes to relevant national policy and legislation that will positively impact on transport in and connections to London.

Updating the Transport Strategy

225. This Strategy will be reviewed and updated every five years to ensure it reflects the priorities of City residents, workers and businesses, changing circumstances and developments in transport technology. Updates will be informed by in depth engagement and analysis of economic, social and transport trends, and will be subject to formal consultation prior to adoption.

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Appendix 3 – Corporate Plan outcome mapping

Transport Strategy outcome	Corporate Plan outcome
The Square Mile’s streets are great places to walk and spend time	9. We are digitally and physically well-connected
Street space is used more efficiently and effectively	9. We are digitally and physically well-connected
The Square Mile is accessible to all	3. People have equal opportunities to enrich their lives and reach their full potential 8. We have access to the skills and talent we need
People using our streets and public spaces are safe and feel safe	1. People are safe and feel safe
More people choose to cycle	9. We are digitally and physically well-connected
Our air and streets are cleaner and quieter	11. We have clean air, land and water and a thriving and sustainable natural environment
Delivery and servicing are more efficient, and impacts are minimised	5. Businesses are trusted and socially and environmentally responsible
Our street network is resilient to changing circumstances	12. Our spaces are secure, resilient and well-maintained
The Square Mile benefits from better transport connections	9. We are digitally and physically well-connected
Emerging transport technologies benefit the Square Mile	9. We are digitally and physically well-connected

Appendix 4 – Draft Integrated Impact Assessment: Cumulative effects



www.landuse.co.uk

City of London Transport Strategy

Integrated Impact Assessment

Prepared by LUC
October 2018

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Cumulative effects

- 1.1 Cumulative effects have been considered in terms of the impact of the Strategy as whole (i.e. all of the outcomes and proposals within each outcome) on each IIA objective, as well as the cumulative effect of the Transport Strategy in combination with other London wide plans and schemes. For this the Integrated Impact Assessment of the draft London Plan prepared by Arup in November 2017 has been considered, and it is the results of the IIA of the preferred strategic options and emerging policies of the Plan that have been reviewed.
- 1.2 **Table 0.1** below shows all of the scores for the outcomes and proposals in the Transport Strategy. The text below considers the overall impact on the IIA objectives and the cumulative effect of the Transport Strategy with the draft London Plan on the IIA objectives.

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Table 0.1 Summary score table

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
Outcome one: Healthy Streets Approach													
1	+	++	+	+	0	++	++	++	+	+	++	0	++
Outcome two: The Square Mile's streets are great places to walk and spend time													
2	+/-	++	++	0	0	++	++	+	0	+	++	0	+
3	+	++	+	0	0	+	+	++	0	++	+	0	0
4	0	+	+	++	0	0	0	+	0	0	+	0	+
5	+	++	0	+	0	+	+	+	0	+	++	0	+
6	0	+	+	0	0	++	++	+	0	0	++	0	+
7	+	++	+	++	0	+	+	++	+	+	++	0	+
8	0	++	0	+	0	++	++	++	++	0	++	0	0
9	0	+	0	0	0	++	++	+	++	0	+	0	0

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
10	0	++	0	0	0	0	++	+	+	0	+	0	0
Outcome three: Street space is used more efficiently and effectively													
11	+/-?	+	0	+	++	++	++	+	0	0	++	0	0
12	+	++	+	+	++	+	+	+	0	+	+	0	++
13	+	++	+	+	0	+	+	+	0	++	++	0	+
14	+	++	0	0	+	+	+	+	0	+	++	0	+
15	0	+	0	0	0	+	+	0	0	0	++	0	+
Outcome four: The Square Mile is accessible to all													
16	0	++	+	0	0	0	0	+	0	++	++	0	++
17	0	++	0	+	0	0	0	+	0	0	++	0	0
18	0	+	0	0	0	0	0	0	0	0	+	0	0
19	0	0	0	0	0	0	0	0	0	+	+	0	++

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
Outcome five: People using our streets and public spaces are safe and feel safe													
20	0	+	+	0	+	0	0	0	0	0	++	0	+
21	+	+	++	0	0	0	0	0	0	+	+	0	++
22	0	+	++	0	0	+?	+?	+	+	+	+	0	++
23	0	++	++	0	0	0	0	+	0	0	++	0	++
Outcome six: More people choose to cycle in the City													
24	+?	+	0	0	+	++	++	+	0	+	++	0	+
25	+?	+	0	0	0	+	+	0	0	+	++	0	+
26	+?	+	0	0	0	++	++	0	0	+	++	0	+
27	0	+	0	0	0	++	++	0	0	0	++	0	+
28	+?	+	0	0	0	++	+	0	0	+	++	0	+
Outcome seven: The Square Mile's air and streets are cleaner and quieter													

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
29	-?	+	0	0	+	++	++	0	0	0	++	0	0
30	0	-?	0	0	0	++	++	0	0	0	+	0	0
31	0	+	0	0	0	++	++	0	0	0	+	0	0
32	+	0	0	0	0	+	+	0	0	0	+	0	0
33	0	+	0	0	0	++	++	0	0	0	++	0	0
34	0	+	0	+	0	++	0	+	0	0	++	0	0
35	0	+	0	+	0	++	0	+	0	0	++	0	0
36	+	+	0	+	0	++	++	+	0	0	++	0	0
37	0	++	0	+	++?	++	0	++	0	+	+	0	0
Outcome eight: Delivery and servicing needs are more efficiently and impacts are minimised													
38	-/+?	+	0	+	++	++/-	++	0	-?	0	++	0	0
39	0	+	0	+	+	++	++	0	0	0	++	0	0

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
Outcome nine: Our street network is resilient to changing circumstances													
40	+	+/-	0	+/-	0	+/-	+	0	0	0	0	0	0
41	0	+	0	0	0	0	0	+	0	0	+	0	+
42	+	0	0	+	0	+	++	+	+	0	+	0	+
Outcome ten: Emerging transport technologies benefit the Square Mile													
43	+	++	++	+	0	++	++	++	0	0	++	0	++
44	+?	+?	+?	+?	0	+?	+?	+?	0	0	+?	0	+?
45	0	+	0	0	0	0	0	0	0	0	+	0	+
Outcome eleven: The Square Mile benefits from better transport connections													
46	++	0	0	0	0	+/-	+/-	0	-?	0	0	0	++
47	++	+	0	0	0	++	++	0	-?	0	++	0	++
48	0	++	0	0	0	+/-	+	0	-?	0	+	0	0

Proposals	IIA objectives												
	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate change mitigation and resilience	Open spaces	Biodiversity and urban greening	Social and cultural facilities	Health	Education	Equality and inclusion
49	+	+?	0	0	0	+	+	0	0	0	+	0	++
50	+	+?	0	0	0	+?	+?	0	0	0	+?	0	+?
51	+	0	0	0	0	+	+	0	-?	0	+	0	++

- 1.3 The proposals within the Strategy are expected to have mainly minor positive or negligible effects on economic growth. Significant positive effects are expected as a result of proposals 46 and 47 because they will help to improve regional, national and international connections to the City, making it a more attractive place for business to locate and a more accessible place for people to work and visit. Only one uncertain negative effect is possible for this IIA objective, in relation to policy 29 as it is considered possible that some businesses may be put off locating in the City if access for certain vehicles is restricted. Overall however, the Strategy is expected to have positive effects in relation to the economic growth IIA objective.
- 1.4 These positive effects on the economy that will result from the Transport Strategy are likely to combine with the strategic options 'making the best use of land' and 'growing a good economy' and emerging policy 'economy' from the draft London Plan to create a more significant positive effect on the economy of the City.
- 1.5 The proposals within the Strategy are considered likely to result in a mix of minor positive and significant positive effects on the built environment and public realm. This is generally because the Strategy will work to enhance the public realm, making it more attractive and accessible. Only one uncertain negative score is considered possible, as a result of proposal 30, because of the visual impact electric vehicle charging points may have on the public realm. However, this is uncertain as it is not stated what type of charging points will be used and it is not known exactly where these will be located. Cumulatively, all of the proposals within the Strategy are expected to have positive effects on the built environment and public realm IIA objective.
- 1.6 The positive effects that the strategy is likely to have in relation to the built environment and public realm, will be made more significant through strategic options and emerging policies in the draft London Plan, which are also expected to have positive effects. These options and policies include; 'building strong and inclusive communities', 'making the best use of land', 'transport' and 'Green Infrastructure and natural environment'.
- 1.7 Mainly negligible and minor positive effects are expected on the safe environment and crime reduction objective as a result of the proposals within the Strategy, although a number of significant positive effects are considered likely as a result of proposals that include measures to reduce crime and improve safety on the City's streets. Overall, the Strategy is expected to have positive effects on the safe environment and crime reduction IIA objective.
- 1.8 The positive effects in relation to a safe environment and crime reduction as a result of the Transport Strategy are likely to be increased by strategic options and policies in the draft London Plan, which have also been assessed as having positive effects. These options and policies include: 'building strong and inclusive communities' and 'design'.
- 1.9 The impacts of the Strategy on heritage within the City are expected to be mainly negligible and minor positive. However, significant positive effects are expected to result from proposal 7 as it aims to enhance the settings of significant heritage assets. Overall therefore, the Strategy is expected to have positive effects in relation to the heritage assets IIA objective.
- 1.10 The positive effects in relation to heritage in the City which will arise as a result of the Transport Strategy will be further increased by emerging policy 'heritage and culture' in the draft London Plan, which is also expected to have positive effects on heritage assets in London.
- 1.11 A mixture of negligible and minor positive effects are expected to result from the Transport Strategy in relation to the waste objective. Four proposals are likely to have significant positive effects: 11, 12, 37 and 38. This is because these proposals will result in a reduction in the number of servicing vehicles and more sustainable waste collection. Therefore, the Strategy is expected to have positive effects in relation to the waste IIA objective.
- 1.12 Positive impacts in relation to the waste objective that will arise from the implementation of the Transport Strategy are likely to be supported and further improved by emerging policies in the draft London Plan, in particular 'sustainable infrastructure' and 'transport' which have been assessed as having positive effects.
- 1.13 The majority of proposals within the Strategy are expected to have significant positive, minor positive or negligible effects in relation to the environmental protection objective, with a couple of mixed effects also considered likely as a result of increased use of the river and promotion of air travel. The positive effects are generally because many of the proposals promote a reduction in

road traffic, which will reduce air and noise pollution in the City. Overall the Strategy is likely to have a positive impact in relation to the environmental pollution IIA objective.

- 1.14 The positive effects of the Transport Strategy in relation to the environmental pollution objective are expected to be supported and enhanced by strategic options and policies in the draft London Plan that address this issue and have been assessed as having positive effects. These options and emerging policies include; 'increasing efficiency and improving resilience', 'sustainable infrastructure', 'design' and 'transport'. However, the emerging policy 'heritage and culture' in the draft London Plan has been assessed as having the potential for short and medium term significant negative effects on noise. This is considered to partially offset the beneficial effects of the Transport Strategy and other draft London Plan policies, though it has been recommended in the IIA of the draft London Plan that this is addressed through related London Plan policies which address noise management.
- 1.15 The Strategy is likely to have a mixture of significant positive, minor positive and negligible effects in relation to the climate change mitigation and resilience objective. Similarly to environmental protection, this is mainly due to the emphasis on reducing road traffic and congestion in the City and a modal shift to walking and cycling, which will result in a reduction in transport emissions. A number of the proposals also promote urban greening, and require the City to be resilient to severe weather events. Overall therefore the Strategy is likely to have positive effects in relation to the IIA objective.
- 1.16 Positive impacts in relation to the climate change and mitigation objective from the Transport Strategy will be increased by strategic option 'increasing efficiency and improving resilience' and by emerging policies 'sustainable infrastructure', 'design' and 'transport' included within the draft London Plan as these have also been assessed as having positive effects in the IIA of the draft London Plan.
- 1.17 Mainly negligible and minor positive effects are expected in relation to the open spaces objective as result of the Strategy, although significant positive effects are expected as a result of a number of proposals. This is because these proposals promote the enhancement of open space, or a reduction in traffic which will improve the tranquillity of open space. Positive effects therefore are expected overall as a result of the Transport Strategy.
- 1.18 The positive impacts on open spaces resulting from the implementation of the Transport Strategy are likely to be further improved through a number of strategic options and emerging policies in the draft London Plan which are also expected to result in positive effects. These include 'creating a healthy city', 'building strong and inclusive communities', 'design' and 'Green Infrastructure and the natural environment'.
- 1.19 The proposals within the Strategy are anticipated to have mainly negligible effects on biodiversity and urban greening, although some minor positive effects are expected and significant positive effects are considered likely as a result of proposals 8 and 9 as these proposals promote additional greenery in the City. Uncertain minor negative effects are considered possible as a result of proposals 37, 46, 47, 48 and 51 because of the increase in river transport and because of the impacts major transport infrastructure projects, such as new stations and station and rail expansions are likely to have some impact on habitats in, or around the City. However, this is uncertain because the specifics of the projects are unknown. Overall therefore it is expected that the effect of the Transport Strategy in relation to this objective will be mainly positive.
- 1.20 An emerging policy in the draft London Plan 'Green Infrastructure and the natural environment', which is also expected to have positive effects on biodiversity and urban greening, will improve on the positive effects that the Transport Strategy is anticipated to have in relation to this IIA objective.
- 1.21 The Strategy is expected to have a mixture of negligible and minor positive effects in relation to the social and cultural facilities objective, although significant positive effects are considered likely as a result of proposals 3, 13 and 16 through the provision of accessible streets, improved leisure facilities and the promotion of lunchtime streets events. Therefore, the impact of the Strategy in relation to the social and cultural facilities objective will be positive.
- 1.22 The positive impacts in relation to the social and cultural facilities objective that are expected to arise as a result of the implementation of the Transport Strategy will be further enhanced through a number of strategic options and policies in the draft London Plan which are also expected to

have positive effects these include; 'building strong and inclusive communities', creating a healthy city', social infrastructure', and 'heritage and culture'. It is noted however that a negative impact of the policy 'heritage and culture' in relation to the night time economy has been raised as a result of anticipated noise pollution. This has been addressed under 'environmental protection' and 'health'.

- 1.23 The impact of the Strategy in relation to the health objective is anticipated to be a mixture of minor positive and significant positive effects. This is mainly due to the proposals which reduce road traffic thus improving air pollution, noise pollution and road safety. Overall the Strategy will have a positive effect on the health of the City's residents and visitors.
- 1.24 The positive impact that the Transport Strategy is anticipated to have on the health of the City's residents and visitors is expected to be further enhanced by the following strategic options and emerging policies in the draft new London Plan; 'creating a healthy city', Green Infrastructure and the natural environment', 'social infrastructure' and 'building strong and inclusive communities'. These have also been assessed, in the IIA of the draft London Plan to have positive effects. However, a significant negative effect has been identified in relation to policy 'heritage and culture' in regards to the impact a night time economy will have on noise. This effect is anticipated to offset some of the positive effects the Transport Strategy will have in relation to the health objective, through it is recommended in the IIA of the draft London Plan that the negative effect is mitigated through noise policies.
- 1.25 The Transport Strategy is anticipated to have a negligible effect in relation to the education objective as this is unlikely to be affected by the implementation of the outcomes and proposals within the Strategy.
- 1.26 While the Transport Strategy is anticipated to have a negligible effect on education, the London Plan is expected to have positive effects as a result of strategic option 'growing a good economy' and emerging policy 'social infrastructure'. Therefore cumulatively the Strategy and draft London Plan are likely to have positive effects.
- 1.27 The proposals within the Strategy are anticipated to have a mixture of negligible, minor positive and significant positive effects in relation to the equality and inclusion objective. Significant positive effects are considered likely as a number of proposals aim to make the streets in the City and public transport more accessible to all. Therefore, overall the Strategy will have positive effects in relation to the equality and inclusion IIA objective.
- 1.28 The positive effects arising from the Transport Strategy in relation to the equality and inclusion objective are expected to be further improved by the following strategic outcome / policy from the draft London Plan, which are also expected to have positive effects; 'building strong and inclusive communities', and 'transport'.

Committee(s):	Date(s):	Item no.
Planning and Transportation Committee	30 October 2018	
Subject: Redevelopment of 6-8 Bishopsgate and 150 Leadenhall Street - Acquisition of Land for Planning Purposes		Public
Report of: Chief Planning Officer		For Decision
Report author: Luke Cutfield, Comptroller and City Solicitor's Department		
<u>Summary</u>		
<ol style="list-style-type: none"> 1. This report seeks your approval in principle for the acquisition of an interest in land for planning purposes by agreement under section 227 of the Town & Country Planning Act 1990 (the TCPA) (S227) enabling the operation of powers under Section 203 of the Housing & Planning Act 2016 (the HPA2016) (S203) to facilitate the carrying out of the redevelopment of the site at the corner of Bishopsgate and Leadenhall Street (as described in paragraph 3 of the Main Report below) (the Development) with the address 6-8 Bishopsgate and 150 Leadenhall Street (shown edged red on the plan at Appendix 3) (the Redevelopment Site). 2. MEC London Property 2 (Nominee 1) Limited and MEC London Property 2 (Nominee 2) Limited (the Developer), as owner of the Redevelopment Site has asked if the City would be prepared to consider intervening by utilising the powers under S227 to enable reliance on the powers in S203. For this to occur it would be necessary for the City to acquire an interest in the Redevelopment Site, and the City's compensation liabilities to be indemnified by the Developer. 3. This report evaluates the request against the relevant criteria, concludes that the tests are met, and recommends agreeing the request. 		
Recommendation		
<p>It is recommended that SUBJECT TO the Town Clerk being satisfied that there is an appropriate Indemnity in place and that it is necessary in order to facilitate the carrying out of the Development (including consideration of whether those entitled to rights of light and other easements and the benefit of restrictive covenants are prepared by agreement (on reasonable terms and within a reasonable period) to permit infringements or breach of the restrictions in time to achieve practical completion by 2022) that the Town Clerk be given delegated authority, in consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee, to approve the following:</p> <ol style="list-style-type: none"> (i) Acquisition of an interest in the Redevelopment Site by the City under S227 in order to engage powers under S203 for the planning purpose of facilitating the carrying out of the Development and subsequent disposal of that interest to the Developer (or an associated company) under section 233 of the TCPA; and (ii) the terms on which the acquisition and disposal referred to above are to be made. <p>(the Recommendation)</p>		

Main Report

Background

- 1) The City granted planning permission for a scheme at the Redevelopment Site on 17 December 2015 under reference 15/00443/FULEIA (the **Original Development**). This was accompanied by a section 106 agreement of the same date. The City subsequently resolved on 3 October 2017 to grant planning permission (pursuant to application 17/00447/FULEIA) for an enlarged version of the Original Development which involves the redevelopment of the Redevelopment Site to provide a taller building than previously consented, subject to completion of a section 106 agreement, which was completed on 13 September 2018.
- 2) The Development stands to impact on the rights of light of a number of neighbouring property interests, as is relatively common for City redevelopment schemes. The Development would also breach a restrictive covenant which burdens part of the Redevelopment Site. The Developer has been seeking to agree terms with the owners of affected properties (the **Affected Owners**) since 2014 (when it began negotiating with the owner of the restrictive covenant).¹ Whilst the Developer has agreed terms with forty-six (46) of the Affected Owners (and is currently confident it eventually will agree terms in relation to the majority of the outstanding negotiations), so far agreements remain outstanding on forty (40) potentially injunctable interests (as set out in the list at **Appendix 5**). Of these interests, nineteen (19) owned by six parties are proving to be particularly complex and slow to resolve (for reasons that are explained in further detail in parts (iv) and (v) of **Appendix 1** below). Accordingly, for the reasons explained in this report, the Developer now considers that the inability to remove the potential injunction risks associated with the rights of light and restrictive covenant enjoyed by these seven parties to be the principal impediment to the delivery of the Development within the proposed construction programme. In this regard, the Developer has come to the conclusion that the timely delivery of the Development will only be possible with the City's assistance in overcoming these potentially injunctable restrictive covenant and rights of light claims.
- 3) The planning permission for the Development is for the following (see **Appendix 4** for an image):
 - i) Demolition of existing buildings;
 - ii) Construction of a new building comprising lower ground level, three basement levels, ground floor plus part 10, 25 and 51 storeys including plant [221.2m AOD] to provide office (Class B1) use [85,892 sq.m GEA], flexible shop/café and restaurant (Class A1/A3/B1) uses [199 sq.m GEA], at part ground floor and level 1;
 - iii) The provision of a publicly accessible roof top viewing gallery [819 sq.m GEA] (*sui generis*) at level 50 with dedicated entrance at ground floor level; and
 - iv) The provision of hard and soft landscaping.

[providing a total of 87,355 sq.m GEA]
- 4) As set out in the Chief Planning Officer's report to the Planning and Transportation Committee of 3 October 2017,² the Development was considered to be in substantial compliance with the policies that relate to it and in particular to support the strategic objective of the City to promote the square mile as the leading international financial and business centre.

¹ Which is described in further detail in part (iv) of Appendix 1.

² Background Paper 2 to this report.

- 5) The scheme provides an employment led mixed-use development that would provide an increase in high quality office and retail floorspace. The publicly accessible viewing platform would provide an attractive public benefit.
- 6) In December 2016 Court of Common Council reaffirmed and updated arrangements previously adopted regarding consideration of requests to intervene to override injunctable interests. It was resolved that consideration would be given on a case by case basis using the criteria considered in this report. Consideration was delegated to the Planning and Transportation Committee, and it was resolved that where Planning and Transportation Committee determine an acquisition may be authorised they may delegate the determination of such matter as they see fit and the final decision to the Town Clerk in consultation with the Chairman and Deputy Chairman. The matters which may be determined by the Town Clerk were stated to include (i) whether adequate attempts have been made to remove injunction risk by negotiating the release of rights of light by agreement; (ii) whether those entitled to rights of light are prepared by agreement (on reasonable terms and within a reasonable time) to permit infringements of those rights. Court of Common Council also clarified that wherever feasible and appropriate, the City would be expected to demonstrate that affected rights holders have been appropriately advised of the proposed resolution, made aware of any report, and provided with a relevant contact at the City to whom they can direct comments.

Proposal

- 7) A right of light is an interest in land (i.e. an easement) which entitles a neighbouring landowner to enjoy light across a neighbouring site. Any development which interferes with that right would constitute a breach of the easement that would entitle the affected owner to claim an injunction preventing development or damages for the effect of the light lost as a result of the interference. A restrictive covenant is a restriction on the use of land imposed by a contract, and enforceable by the person with the benefit of the covenant.
- 8) The risk that a person or person entitled to a relevant right or interest or to the benefit of a covenant may seek and/or obtain an injunction restricting the proposed Development can be overcome by engaging the provisions contained in S203 and thereby conferring statutory authority to carry out the works notwithstanding the interference with the rights to light or breaching the restriction as to user of the land. The operation of S203 is described in the Legal Implications section of this report.
- 9) The Developer has asked if the City would be prepared to consider acquiring an interest in the Redevelopment Site for the planning purpose of facilitating the carrying out of the Development, so as to engage the provisions of S203. Such interest would be transferred back to the Developer (or an associated company) who would be able to proceed with the Development. The Developer's request is annexed at **Appendix 8**.

Considerations

- 10) In making a decision as to whether to acquire an interest in the land for the planning purpose of the Development, the City must be satisfied that there is a compelling case in the public interest that the powers conferred by S203 be engaged in order that the building or use proposed can be carried out within a reasonable time. The criteria to be applied in deciding whether there is such a compelling case are set out and evaluated in **Appendix 1**. It is considered that these tests have been met subject to the conditions in the Recommendation being fulfilled and subject to the determinations delegated to the Town Clerk.

Proposed acquisition and disposal

- 11) It is recommended that authority to agree the terms of the acquisition and disposal be delegated to the Town Clerk taking account of advice from the City Surveyor and in

consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee.

Legal implications

- 12) The City may acquire an interest in the land to be developed by agreement under Section 227 TCPA. Such acquisition must be for a purpose for which the City may be authorised to acquire land under Section 226 TCPA. The purposes for which land may be acquired are set out in Section 226(1) as follows:
 - (a) if the authority think that the acquisition will facilitate the carrying out of development / redevelopment or improvement on or in relation to the land; or
 - (b) if the land is required for a purpose which it is necessary to achieve in the interests of proper planning of an area in which the land is situated.
- 13) In this case, the purposes fall within the ambit of section 226(1)(a) as the acquisition of the land would facilitate the carrying out of the redevelopment scheme as described in this report.
- 14) But a local authority must not exercise the power under paragraph (a) unless they think that the development, redevelopment or improvement is likely to contribute to the promotion or improvement of one or more of the economic, social or environmental well-being of their area. The City would need to conclude that the acquisition would satisfy these tests to take the matter further. Advice on this is provided in part (iii) of **Appendix 1**.
- 15) If land is acquired by a local authority and the local authority could acquire the land compulsorily for the purposes of the building or maintenance work, and where there is planning consent for the building or maintenance work, and the building or maintenance work is for purposes related to the purposes for which the land was acquired by the local authority, S203 provides that the carrying out of the building or maintenance work on that land is authorised notwithstanding that it involves interference with a relevant right or interest or breach of a restriction as to the user of land, which includes rights to light and restrictive covenants such as those under consideration in this case. Where interference with rights or breach of restriction as to user is authorised, compensation is payable. Such compensation is based upon the diminution in value of the dominant owner's interest, as per section 204 of the HPA2016.
- 16) The City would have the power to dispose of an interest in land acquired by agreement under S227 by virtue of Section 233 of the TCPA. It is not necessary to justify acquisition for the authority to intend to carry out the development itself. A site may be acquired with a view to onward disposal. Disposal may take place under Section 233 in such manner and subject to such conditions as appear to the City to be expedient in order:
 - i) to secure the best use of that or other land and any buildings or works which are to be erected or carried out on it (whether by themselves or by any other person); or
 - ii) to secure the erection, construction or carrying out on it of any building or works appearing to them to be needed for the proper planning of the area.
- 17) Unless consent is obtained from the Secretary of State, the disposal must be at the best consideration that can reasonably be obtained. If the Recommendation is accepted, the Town Clerk will determine (in consultation with the City Surveyor and the Chairman and Deputy Chairman of the Planning and Transportation Committee) the specific terms on which the acquisition and disposal are to be made and will only give their approval for the transaction if they are satisfied that this test will be met.
- 18) If the acquisition takes place as proposed the provisions of S203 will be engaged as:

- i) There is planning consent for the Development
- ii) the land will, at a time after 13th July 2016 have been acquired by a specified authority (such authorities include a local authority such as the City Corporation)
- iii) under the powers conferred on it by section 226(1)(a) of the TCPA the authority (the City) could, on being authorised to do so by the Secretary of State, acquire the land compulsorily if they think that acquisition will facilitate its redevelopment. In this case it is the view of officers that such acquisition would facilitate the redevelopment of the Redevelopment Site.
- iv) The building work is for purposes related to the purposes for which the land was acquired.

Financial and risk implications

- 19) In implementing S203 arrangements and disposing of any interest acquired under S227 back to the Developer, the City would need to be satisfied that all liabilities and costs arising from the arrangements (including any compensation liabilities falling to the City and potential costs associated with undertaking negotiations in relation to proceedings brought in the Lands Tribunal (the Upper Tribunal (Lands Chamber)) can be met by the Developer. S204 of the HPA2016 provides that the liability to pay compensation (if not discharged by the Developer) would be enforced against the City.
- 20) The risks will be addressed through the Developer giving an Indemnity under which the Developer will indemnify the City against all matters arising from the transaction. . The Indemnity will include assurances that the highest offers made to date to each of the individual owners as compensation for any interference with their relevant rights or interests which may arise as a result of the Development will be honoured by the Developer.
- 21) It is proposed that the terms of an Indemnity be delegated to the Town Clerk upon advice from the City Surveyor and City Solicitor and in consultation with the Chairman and Deputy Chairman of the Planning and Transportation Committee

Consultees

- 22) The City Planning Officer, City Surveyor, Town Clerk, Chamberlain and Comptroller & City Solicitor have been consulted in the preparation of this report. The affected properties which benefit from rights or interests likely to be subject to injunctable infringements are scheduled at **Appendix 5**, and all Affected Owners have been consulted as detailed in part (ix) of **Appendix 1**.

Conclusions

- 23) It is considered that the potential acquisition of the Redevelopment Site for the planning purposes of the Development and the ability to use powers under S203 should be approved in principle on the following basis:
 - It is considered desirable for the Development to progress and be completed in 2022 in accordance with the development programme (as explained in paragraph 3 of **Appendix 1**) (the **Development Programme**), in particular to secure the addition of the new building, provision of the publicly accessible viewing gallery and to provide significant employment generation and employment floorspace to meet anticipated demand.
 - The Development would make more efficient use of the Redevelopment Site as compared to the disjointed existing buildings (being office buildings comprising of 2

podium floors and 20 upper floors at 6-8 Bishopsgate and 6 upper floors at 150 Bishopsgate).

- The size and configuration of the new office space would be of benefit to the business community generally and would contribute to the targets contained in policy CS1 of the City of London Local Development Framework.
- All of the Considerations set out in **Appendix 1** have been addressed or delegated and on balance, the relevant criteria are satisfied support the acquisition proposed in the Recommendation subject to the matters to be delegated to the Town Clerk for further consideration.
- Affected Owners who have rights or interests infringed will be entitled to compensation.

Background papers:

Papers	Committee(s)	Date
1. Rights of Light Issues Affecting Development – Update	Report to Planning & Transportation Committee	28 November 2016
	Report to Court of Common Council	8 December 2016
2. Redevelopment of 6-8 Bishopsgate and 150 Leadenhall Street – Application for planning permission	Report to Planning and Transportation Committee	3 October 2017

Appendices:

- 1. Relevant Criteria and Evaluation**
- 2. Plan depicting the Burdened Land**
- 3. Redevelopment Site Plan**
- 4. Image of Development**
- 5. Schedule of affected properties**
- 6. Extract from the 3 October 2017 Committee report evaluating the daylight/sunlight impacts**
- 7. Cut back drawing**
- 8. Developer’s request to use S203**

**Contact: Luke Cutfield - Public and Corporate Law for Comptroller and City Solicitor
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APPENDIX 1

Relevant Criteria and Evaluation

1. In accordance with the criteria endorsed by the Court of Common Council on 8 December 2016,³ the City must be satisfied that there is a compelling case in the public interest that the powers conferred by S203 be engaged in order that the building or use proposed can be carried out within a reasonable time and in particular, that:
 - (i) There is planning consent for the proposed development;
 - (ii) Acquisition or appropriation and consequent engagement of S203 will facilitate the carrying out of development, redevelopment or improvement on or in relation to land, and in particular the proposed development for which planning consent has been obtained, or similar development;
 - (iii) The development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental wellbeing of the authority's area and those benefits could not be achieved without giving rise to all or some of the infringements - therefore it is in the public interest that the land be acquired by the City or appropriated by them for planning purposes, so as to facilitate the development proposed or similar development.
 - (iv) There will be infringements of one or more relevant rights or interests as defined in section 205(1) of the HPA2016 or breach of a restriction as to user of land which cannot reasonably be avoided;
 - (v) The easements to be interfered with cannot reasonably be released by agreement with affected owners within a reasonable time (and adequate evidence of satisfactory engagement, and where appropriate negotiation, has been provided to the City);
 - (vi) The ability to carry out the development, including for financial or viability reasons, is prejudiced due to the risk of injunction, and adequate attempts have been made to remove the injunction risks;
 - (vii) A decision to acquire or appropriate in order to engage S203 would be broadly consistent with advice given in the DCLG Guidance on Compulsory Purchase (2015) (updated in February 2018) (the **DCLG Guidance**) (and any replacement thereof) so far as relevant;
 - (viii) The use of the powers is proportionate in that the public benefits to be achieved outweigh the infringement of human rights;
 - (ix) The developer and the City have consulted with rights holders regarding the engagement of S203 wherever feasible and appropriate in the circumstances of the case.

Each of these considerations is addressed using the same enumeration below.

(i) Planning permission

2. Planning permission was issued for the Development on 13 September 2018 under reference 17/00447/FULEIA.

³ Background Paper 1 to this report.

(ii) Facilitation of the Development by use of S203

3. Based on the evidence submitted by the Developer, the Development Programme cannot be met unless those entitled to relevant rights or interests agree to infringements or the infringements are authorised by S203. To maintain the programme in order to maximise the ability to deliver the completed development, including completion of demolition of the existing buildings in time to start construction in December 2018, with an expected completion date in 2022. Completion in 2022 is considered in the public interest due to anticipated imbalance between supply and demand for new stock at that time based on the City's Employment Trends, known active business requirements between 2020 - 2022 and Development Pipeline Research.⁴
4. In order to maintain the Development Programme, commitment to the ground works and foundations packages totalling approximately £24.5million needs to be made in the 4th Quarter of 2018 and the 1st Quarter of 2019. However, the Developer advises that having already expended approximately £36million in respect of the Development to date, the Developer is not able to make this further commitment whilst there is a significant risk to this investment in that a third party could seek an injunction restraining the developer from carrying out the Development. The Developer's view is that this risk can be satisfactorily addressed by the recommended "in principle" resolution, albeit subject to delegated matters, and by subsequent acquisition of the Redevelopment Site. The City Property Advisory team is satisfied that this is a credible and legitimate approach, far from unique to this Developer, and that the resolution is likely adequately to de-risk the scheme and enable continued investment, maximising the likelihood that the Development Programme will remain on track to help meet forecast demands in 2022.

(iii) Development in the public interest due to promotion of the economic, social or environmental wellbeing of the City

5. The recent planning history of the Redevelopment Site is outlined in the Background section of this report. The scheme will deliver an employment led mixed-use development that will enable the provision of an additional 52,718sq.m gross of B1 office floorspace over the existing buildings and 15,776sq.m more than the permission for the Original Development. The additional 52,718sq.m of additional office space equates to a projected employment generation of up to around 6,500 people. This calculation is based on the fact that it is common for businesses within the financial services sector to operate at densities and a rate of one person per 8sq.m NIA. In addition, the Development will provide public realm improvements. The Development is considered to be in substantial compliance with policies as discussed in more detail below.
6. The London Plan includes the following relevant policies:
 - i) Policy 2.10 "Central Activities Zone – Strategic Priorities" which says that the Mayor will and boroughs should sustain and enhance the City of London as a strategically important globally-oriented financial and business services centre.
 - ii) Policy 2.11 "Central Activities Zone – Strategic Functions" which says the Mayor will and boroughs should secure completion of essential new transport schemes necessary to support the roles of CAZ, including Crossrail, and realise resultant uplifts in development capacity to extend and improve the attractions of the Zone.
 - iii) Policy 4.2 "Offices" which says that the Mayor will, and boroughs should recognise and address strategic as well as local differences in implementing this policy to meet the needs of the central London office market by sustaining and developing its unique and

⁴ Employment Trends in the City of London (published by the City Corporation with underlying data from Office for National Statistics)

dynamic clusters of “world city” functions and by encouraging renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.

7. The City of London Local Plan 2015 includes the following policies:

- i) Under “Implementation And Delivery” at paragraph 1.15, it states that the City will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high quality development the City needs.
- ii) Strategic Objective 1 which is: “to maintain the City’s position as the world’s leading international financial and business centre”.
- iii) Core Strategy Policy CS1 which is: “To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London’s role as the world’s leading international financial and business centre, by:

- Increasing the City’s office floorspace stock by 1,150,000 m2 gross during the period 2011 – 2026 to meet the needs of projected long term economic and employment growth, phased in three five-year phases as follows:

Phase 1 - 2011 – 2016: 650,000 m2

Phase 2 - 2016 – 2021: 250,000 m2

Phase 3 - 2021 – 2026: 250,000 m2

A pipeline of at least 750,000 m2 gross office floorspace with planning permission but not yet commenced will be maintained to provide office occupier choice.

The target of 650,000 m2 in Phase 1 (2011/12 to 2015/16) equates to an average of 130,000 m2 per annum. For each of the financial years (apart from 2014/15) there was a net loss in office floorspace. This was due to significant demolition of floorspace to enable redevelopment schemes to be delivered.

In Phase 2 (2016/17 to 2020/21) a net gain target of 250,000 m2 was set, which equates to an average of 50,000 m2 per annum. For the financial years in 2016/17 there was a net loss of 61,600 m2 and in 2017/18 there was a net increase of 131,100 m2.

In Phase 3 (2021/22 to 2025/26) the projections are primarily based on a mixture of sites:

- where permission for redevelopment is granted but not commenced,
- where an application has been submitted but is awaiting a decision as at 31st March 2018,
- plus, the application of long term trends relating to sites known from pre-application discussions.

The projections suggest that during this phase there would be a broad balance between the net gain stock supply and the office stock target. The office

floorspace is projected to increase from 8,900,000 m² in 2011/12 to 10,500,000 m² in 2025/26.

As the Development would provide 52,718sq.m of additional office floorspace when completed, it stands to contribute in a meaningful way towards the office floorspace targets.

- Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers, protecting potential large office sites from piecemeal development and resisting development that would jeopardise the future assembly and delivery of large sites.
 - Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.
 - Promoting inward investment and encouraging developers and businesses to invest and locate in the City.
- iv) Policy DM 1.2 which is "To promote the assembly and development of large office schemes in appropriate locations", states that the City will invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites.
- v) Policy DM 1.3 which is "To promote small and medium sized businesses in the City", states that the City will achieve this by encouraging office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units.
- vi) Policy DM 1.5 which is "To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents."
- vii) Policy DM 10.7 relating to sunlight and daylight includes the statement in supporting text paragraph 3.10.42 that "If a development is considered acceptable in planning terms and has planning permission, but it not proceeding due to rights to light issues, the City may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed."
8. The provision of the publicly accessible viewing gallery at level 50 is supported by the following policies in the London Plan and Local Plan:
- i) Policy 7.7 of the London Plan, which states at paragraph C that:
- "Tall and large buildings should:
- [...]
- incorporate publicly accessible areas on the upper floors, where appropriate"
- ii) Policy DM 10.3 which directs:
- "To encourage high quality roof gardens and terraces where they do not:
- immediately overlook residential premises;
 - adversely affect rooflines or roof profiles;

- result in the loss of historic or locally distinctive roof forms, features or coverings;
- impact on identified views.

Public access will be sought where feasible in new development.”

9. In conclusion, the acquisition of the Redevelopment Site for planning purposes pursuant to S227, so as to engage S203, will facilitate the carrying out of the Development which will contribute to the achievement and improvement of the economic well-being of the City as a whole (for example through the provision of offices) and of the environmental well-being of this part of the City (for example through the provision of the publicly accessible viewing gallery, and significant employment generation).
10. The Development has secured a substantial planning obligation package together with contributions to the Mayoral and City CIL schemes, including financial contributions towards transport, affordable housing, local training and employment, carbon offsetting and security (up to approximately £1.45 million in total); and
11. The key benefits of the Development are:
 - i) the provision of an employment led mixed-use development projected to accommodate up to around 6,500 additional people (when compared with the existing buildings on the site) and including retail to provide support services to the workforce in the area.
 - ii) the provision of around 85,892 sq.m (GEA) of high quality office space, which equates to 52,718 sq.m (GEA) of additional floorspace (when compared with the existing buildings on the site).
 - iii) the provision of a publicly accessible viewing gallery and public lifts to be maintained by the Developer.
 - iv) the efficient and productive use of the Redevelopment Site.
12. As demonstrated by the drawings attached to this report at **Appendix 7**, the Development it is not feasible to erect a building which gives rise to the benefits set out above and which avoids some or all of the rights of light infringements and/or is not in breach of the restrictive covenant. In particular there is no evidence that a viable scheme could be delivered in the Redevelopment Site, meet the aspirations for the site derived from planning policy, and avoid infringement of rights of light and the restrictive covenant. If the Development does not proceed, the benefits identified above will not be delivered. There are two additional interests that stood to suffer actionable infringements as a result of the Development (that did not suffer them as a result of the 2015 scheme). Infringements on these interests could have been avoided by implementing the Original Development. However, the Developer has advised that it has reached agreement with these two interests, so in practical terms, there stands to be the same number of actionable interests under both schemes.
13. In relation to the benefits outlined at paragraphs 11.(i) and (ii) above, these relate directly to the design and scale of the Development and are considered important in assisting the City to maintain and enhance its role as one of the world’s leading financial and business centres. This Development would stand to suit and accommodate tenants with relatively large floorspace requirements which is considered to promote Core Strategy Policy CS1.
14. The provision of the benefits identified in paragraph 11.(iii) above flow from the comprehensive redevelopment of the Redevelopment Site and will not be delivered as a package without the Development.

15. The provision of the benefits identified in paragraphs 11.(iii) and (iv) above flow from ensuring that the Development Programme is not delayed as a result of issues in settling the remaining rights and interests. It would be detrimental to the rejuvenation of the area if the Redevelopment Site remains vacant and/or undeveloped for any considerable period of time.
16. For the reasons given the Development is likely to contribute to the achievement of two of the objects identified in S226(1A) of the TCPA. It would bring about the promotion or improvement of the economic and environmental well-being of the City's area.

(iv) Infringement of rights by the Development cannot be reasonably avoided

Restrictive covenant

17. Part of the Redevelopment Site bears the burden of a restrictive covenant in favour of 145/146 and 147/148 Leadenhall Street. The restrictive covenant prohibits the construction of any building, wall, fence or other structure which exceeds 17.5 metres above Ordnance Datum (temporary scaffolding or plant excluded) on the land shown hatched green on the plan at **Appendix 2** to this report (the **Burdened Land**).
18. This restrictive covenant constitutes an unavoidable constraint on the development of part of the Redevelopment Site. Accordingly, the Developer has been trying for more than four years to negotiate a release from the restrictive covenant, in order to be able to develop the Burdened Land without complying with its terms.
19. The negotiations are well advanced, but there is no realistic prospect that that they will be finalised within the time frame identified for release of the next tranche of development funding so as to allow works to be carried out in accordance with the development programme set out at paragraph 3 above.

Rights of light

20. In terms of the history of negotiations with the Affected Owners, the Developer has advised the City that specialist rights of light surveyors (Waldrams) have been retained to advise on the impacts of the Development on light levels enjoyed by neighbouring properties.
21. In August 2017, having carried out the relevant technical analysis, Waldrams began to negotiate with Affected Owners with relevant rights of light infringements on behalf of the Developer. Waldrams identified 86 property interests with rights of light infringements (45 of which are considered to sustain potentially injunctable alterations in light) as a result of the Development. A schedule of the property interests and the status of negotiations for each is provided in **Appendix 5** to this report.
22. As a result of these negotiations, the Developer has successfully agreed or completed deeds of release in respect of 46 property interests out of the 86 affected. The Developer will honour the agreed terms of all such in principle settlements (subject in each case to the necessary contracts being agreed).
23. However, both legal and remaining commercial negotiations with other Affected Owners are proceeding slowly. The Developer has indicated that negotiations will continue in good faith with the interests in the remaining properties. Despite this commitment, the Developer is of the view that realistically, there is no prospect that agreement will be reached, and binding deeds of release entered into with the remaining Affected Owners to enable the Development Programme to be met for the following reasons:
 - i) The Developer remains a considerable distance apart from five parties in terms of coming to an agreement and as such, there is no reasonable prospect that agreements will be reached within the next few months, in time to meet the Development

Programme. This is not simply a result of disagreement on the appropriate compensation, it is also to do with the legal complexity and interpretation of who has the rights within the particular building and, therefore, how the compensation should be split between freeholder, leaseholder and occupier.

- ii) A number of the negotiations are with surveyors who need to take instruction from overseas investors. Responses are often significantly delayed with offers remaining responded to over a number of months. This is also the case for the restrictive covenant which needs to be acquired.
 - iii) The sheer volume of transactions required means that a considerable number of the negotiations are unlikely to be concluded by the time the Developer needs to commit to the initial works packages.
24. To date, all Affected Owners have had offers made to acquire their respective interests. All settlements agreed and best offers made to date would be honoured by the Developer. This would be secured in the Indemnity which will be required to be given prior to any acquisition. Affected Owners could also refer the level of compensation to the Lands Chamber. Before proceeding with any acquisition, the City would need to satisfy itself that all reasonable efforts had been made to release rights by agreement and offers issued in this regard would be reviewed to ensure all reasonable efforts had been made.
25. The impacts in planning terms, of the issues of daylight, sunlight and overshadowing were fully considered when this Committee resolved to approve the Development in October 2017. An extract from the 3 October 2017 Committee report evaluating the daylight/sunlight impacts is annexed at **Appendix 6**.

(v) Rights cannot reasonably be released by agreement

26. In deciding whether it is necessary to acquire an interest in land under S227 so as to engage the provisions of S203 and thereby facilitate the carrying out of the Development, consideration should be given to whether agreements to permit infringement can be reached with owners of affected properties with rights on reasonable terms and within reasonable timeframes. The Recommendation delegates this decision to the Town Clerk. As described under part (ix) the City has been in communication with affected rights holders and is satisfied that the Developer has acted reasonably to date. The City would normally wish to allow longer for further efforts to be pursued following its communication with rights holders. However, for the reasons given above relating to release of development funding and the public interest in securing completion in 2022, it is considered appropriate to recommend an in-principle resolution in advance of further efforts to secure negotiated releases being made and scrutinised by the City.

(vi) Development prejudiced due to risk of injunction

27. For the reasons set out above at paragraphs 3, 4 and 23, the carrying out of the Development is prejudiced by the risk of injunction. If the Developer is not in a position to make the required payments (as described in paragraph 4 above) due to a risk of injunction, then this stands to prejudice the Development Programme and the availability of new office space to meet anticipated demand in 2022.

(vii) Decision to engage S203 would be consistent with DCLG Guidance

28. The City has the power under section 226(1) of the TCPA to make an order to acquire the Redevelopment Site compulsorily. The advice given in the DCLG Guidance should be taken into account in deciding whether to acquire land in order to engage the provisions of S203. At paragraph 12, the DCLG Guidance states that a compulsory purchase order should only be made where there is a compelling case in the public interest. A similar approach should

be taken when deciding whether to acquire land for planning purposes in order to engage S203. Given that it is in the public interest that the Development should proceed (as discussed in part (iii) above), and the fact that the Development (or some similar development) will not proceed whilst the prospect of an injunction to restrain interference with rights to light or breach of the restrictive remains, there is a compelling case in the public interest that the Redevelopment Site should be acquired for planning purposes in order to engage the provisions of S203.

29. A confirming authority would expect the acquiring authority to demonstrate that they have taken reasonable steps to acquire all of the land and rights included in the Order by agreement. The Town Clerk would need to satisfy himself of this in consultation with the Chairman and Deputy Chairman and on advice from the City Surveyor before authorising acquisition under his delegated authority. Here, it would be appropriate to show the efforts undertaken by the Developer and in particular the attempts to acquire the relevant interests by agreement. In addition, the Developer has confirmed that after any resolution, it would continue to settle compensation at the highest monetary offer made to each relevant party to date, and this requirement is to be contained in the Indemnity provided to the City.
30. The DCLG Guidance also says that when making and confirming an order, acquiring authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. These issues are considered below in part (viii).

(viii) Public benefits associated with engagement of S203 outweigh infringement of human rights

31. Human Rights issues arise in respect of the proposed arrangements. An acquiring authority should be sure that the purposes for which the Redevelopment Site is to be acquired and for which rights are to be overridden sufficiently justify interfering with the human rights of those with interests in the land affected. Furthermore, following the introduction of the Human Rights Act 1998 the City is required to act in accordance with the European Convention on Human Rights (the **ECHR**) in deciding whether or not to implement the arrangements. Article 1 of the First Protocol of the ECHR provides that every natural or legal person is entitled to peaceful enjoyment of their possessions. Acquisition of property under S227, which engages S203 to allow interference with a relevant right or interest, involves interference with a person's rights under this Article. As these rights are enjoyed by corporate bodies as well as individuals all of those whose rights will be affected can claim an infringement.
32. However, the right to peaceful enjoyment of possessions in this Article is a qualified rather than absolute right, as the wording of Article 1 of Protocol 1 permits the deprivation of an individual's possessions where it is in the public interest and subject to the conditions provided for by law and by the general principles of international law.
33. There must therefore be a balancing exercise between the public interest and the individual's rights whereby any interference in the individual's rights must be necessary and proportionate. "Proportionate" in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim. A "fair balance" must be struck between the rights of the individual and the rights of the public. It is for members to consider the issues raised in this report and to strike that "fair balance" in coming to its decision.
34. In the present case it is considered that the public interest in facilitating the redevelopment outweighs the rights of the individuals to peaceful enjoyment of their possessions and that the proposed use of S203 powers amounts to a proportionate interference in all the circumstances. Central to the issue of proportionality is the availability of compensation to those who are deprived of their relevant right or interest.

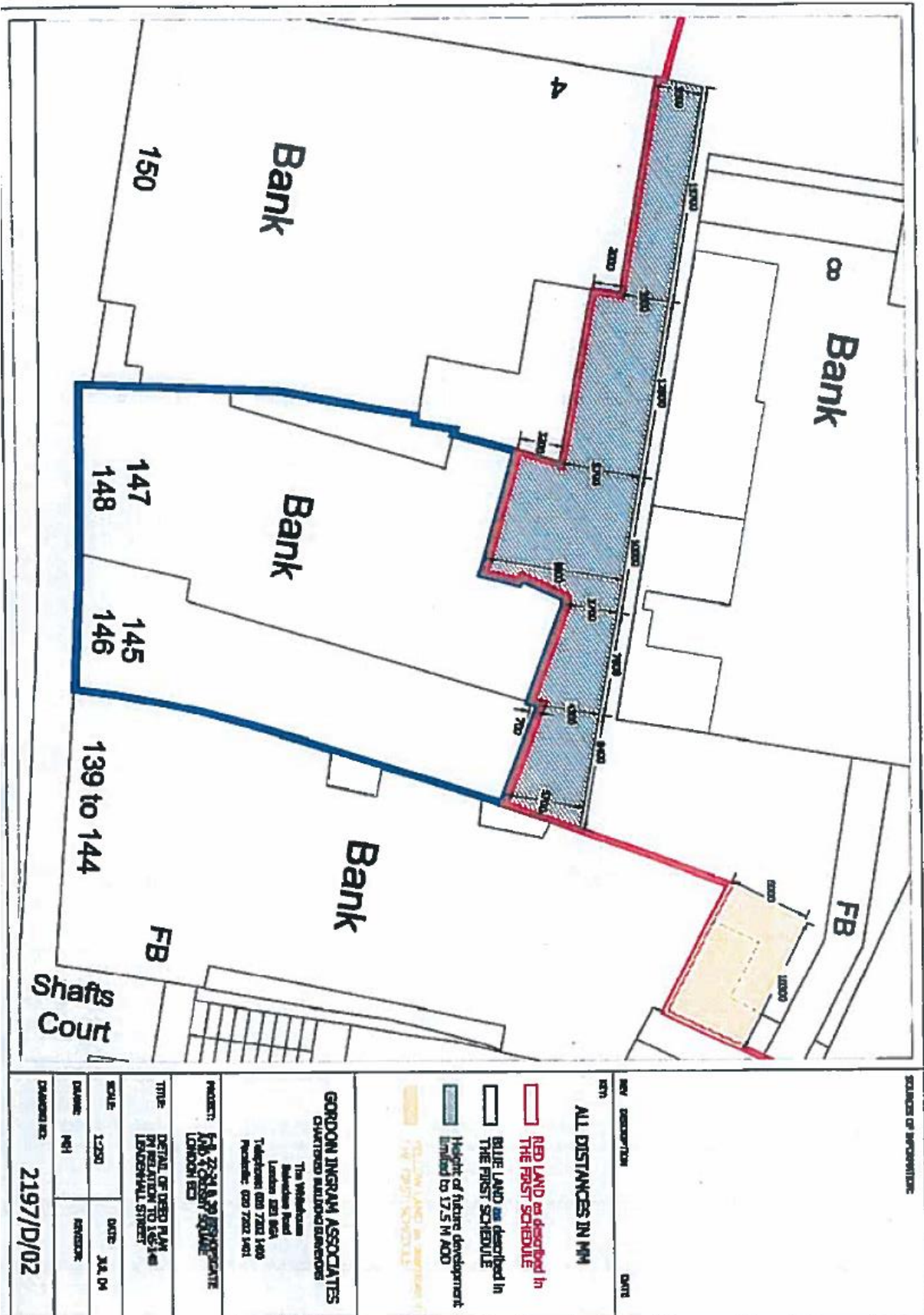
35. The key public benefits arising from the Development are set out at paragraph 11 above. The planning implications of the Development have been fully considered and it has been deemed acceptable with planning permission being issued on 13 September 2018.

(ix) Consultation with Affected Owners

36. The Developer has contacted all of the Affected Owners with the intention of negotiating settlements in respect of each interest in accordance with the schedule annexed at **Appendix 5**. The City wrote to all Affected Owners with injunctable interests (as shown in **Appendix 5**) that were yet to conclude agreements for settlement on 3 October 2018. The Affected Owners were advised that the City had been asked by the Developer to consider acquiring an interest in the Redevelopment Site for the planning purpose of facilitating the carrying out of the Development, so as to engage the provisions of S203. The letters also briefly explained the effect of S203 and welcomed engagement on any outstanding issues that the recipient may have. A large portion of the recipients had already engaged surveyors and reached agreements in principle with the Developer (as shown in **Appendix 5**) and as at 16 October 2018, the City had received six responses, five of which either seek clarification about previous communications or confirm that negotiations are ongoing with the Developer. One response was received from a firm of solicitors acting for one of the parties who allege infringement of rights of light. That party is not one of the five parties referred to in paragraph 23(i) above. The response states that the right holder would not seek to be overly obstructive of the scheme and would only seek appropriate compensation, and that the response should not influence the City's decision. Any dispute which remains unresolved will be evaluated before any delegated decision to acquire is made by the Town Clerk, to ensure reasonable efforts to release rights by agreement had been made by the Developer.
37. The City will again write to the same Affected Owners once this report is available online, notifying them that the report is being made with the Recommendation to engage S203 subject to the conditions.

APPENDIX 2

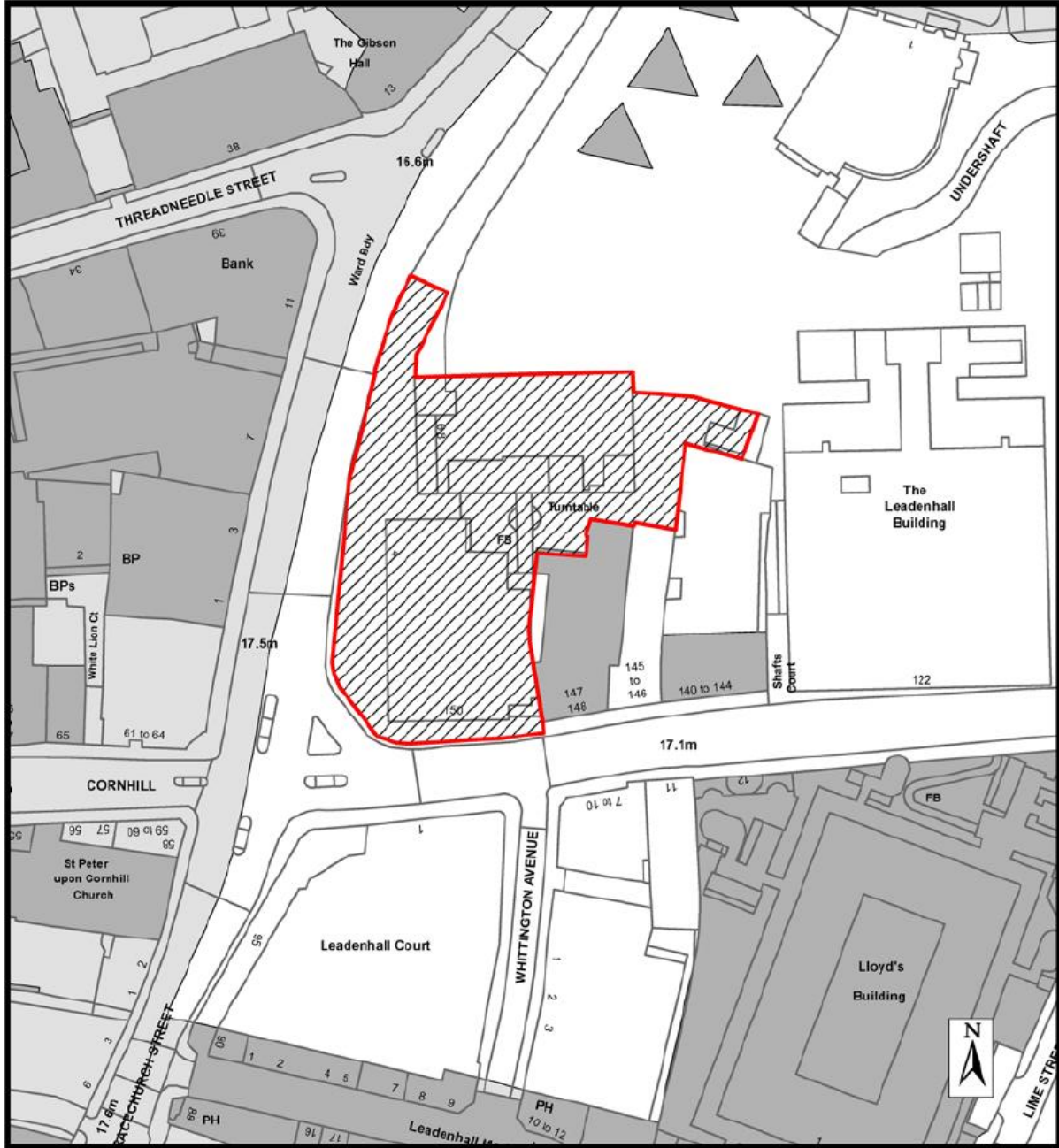
Plan Depicting the Burdened Land



APPENDIX 3

Redevelopment Site Plan

Site Location Plan



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ADDRESS:
6-8 Bishopsgate & 150 Leadenhall Street

CASE No.
17/00447/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT

APPENDIX 4

Image of Revised Development



APPENDIX 5

Schedule of Affected Properties

6-8 Bishopsgate and 150 Leadenhall Street: Rights to Light/3rd Party Negotiation Tracker: 8th October 2018

<i>3rd Party Rights: Negotiation Summary</i>	Total Buildings	Total Parties	Deed Signed/No Action Open Correspondence	Terms Agreed	Offers Made	Analysis Issued/Still to Offer	No Contact	Total
Buildings with clear Actionable Injuries Identified <i>Number of Parties (Freehold and Leasehold with rights)</i>	35	44	2	19	23	0	0	44
Buildings where Injury is less/risk of being actionable <i>Number of Parties (Freehold and Leasehold with rights)</i>	34	42	7	18	15	2	0	42
	69	86	9	37	38	2	0	86
Additional Buildings analysed where no further action required	44							

Total Amount Offered to Date	£5.96 m
Total Amount Offered 15 07 18	£4.91m

Notes

Offers made/Terms agreed includes no injury agreements
Amount offered includes for 147 L St Restrictive Covenant

APPENDIX 6

Extract from the 3 October 2017 Committee report evaluating the daylight/sunlight impacts

Daylight and Sunlight

192. Loss of daylight and outlook is a material planning consideration. Policy DM10.7 of the Local Plan seeks “To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to levels which would be contrary to the Building Research Establishment’s guidelines”.

193. A report has been submitted analysing the effect of the proposal on daylight and sunlight to the Leatherseller’s Company overnight sleeping accommodation at 33 Great St Helen’s, which is ancillary to the livery company use.

194. The analysis has been carried out in accordance with the Building Research Establishment (BRE) guidelines “Site Layout Planning for Daylight and Sunlight”. The guidelines are advisory rather than mandatory and need to be interpreted flexibly, taking into account other factors which might also affect the site.

195. The analysis indicates that the neighbouring residential property would continue to meet the BRE criteria for Vertical Sky Component (VSC), No Skyline (NSL), Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH) with no noticeable loss of daylight or sunlight.

196. There are no other residential premises where daylight or sunlight would be affected by this proposal.

Amenity Space

197. The BRE guidance on sunlight to a garden or amenity area advises that for it to be adequately sunlit throughout the year no more than 40%, and preferably no more than 25%, should be in permanent shade on 21st March.

198. The amenity space around the Site that could potentially be impacted by the proposed development is the space directly in front of St Helen’s Bishopsgate Church.

199. The supporting data submitted by the applicant indicates that no part of this area would be affected by the proposal.

200. Crosby Square to the north of the proposal site has not been assessed as the 22 Bishopsgate scheme stands between the square and the proposed building.

Other Properties

201. Sunlight to the stained glass windows of St Helen’s Bishopsgate Church would not be affected by the proposed development.

Solar Glare

202. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Viewpoints for the analysis were positioned at points before a junction or traffic lights where a distraction to motorists might occur. The viewpoint was positioned at 1.5m above ground at the height of a sitting driver and pointing down the centreline of the road where drivers’ vision is critical.

203. The environmental statement highlighted a potential significant effect on motorists and cyclists between 10:30am and 12:00pm from March to September. The glazing on the southern facade is not contiguous and would be recessed reducing the impacts, breaking up the glare and isolating the points at which it could be seen at any given moment.

204. The permitted 1 Leadenhall Street development, when constructed, would cast a shadow on the proposed development which would eliminate the reflected solar glare for road users. Should the 1 Leadenhall Street scheme or a similarly sized development on that site be constructed, there would be no need for specific mitigation measures.

205. The Applicant is considering a range of mitigation options, which would form part of further development, such as, changing the orientation of the glazed facade elements, the use of low reflective glazing or the addition of louvres.

206. Details of the mitigation of the potential solar glare, is the subject of a condition.

APPENDIX 7

Cut back drawing

<p>PROPOSED SCHEME MASSING 27-588</p> 	<p>PROPOSED CUTBACK MASSING</p> 	<p>SOURCE OF INFORMATION: WALDRAMS LTD REL 27/19</p> <p>NOTES: PROPOSED CUTBACK SHOWN IN PURPLE PROPOSED SCHEME MASSING SHOWN IN BLUE</p> <p> waldrams ARCHITECTS AND INTERIORS www.waldrams.co.uk</p> <p>PROJECT: 4-6 BISHOPSGATE AND 130 LEADENHALL STREET LONDON EC2N</p> <p>DRAWING: PLAN VIEW PROPOSED CUTBACK RIGHTS OF LIGHT</p> <table border="1"> <tr> <td>DATE: 28.03.19</td> <td>SCALE: 1/250</td> </tr> <tr> <td>DESIGNED BY: ET</td> <td>DRAWN BY: ET</td> </tr> <tr> <td>PROJECT NO: 1169</td> <td>DRAWING NO: 27-588</td> </tr> </table>	DATE: 28.03.19	SCALE: 1/250	DESIGNED BY: ET	DRAWN BY: ET	PROJECT NO: 1169	DRAWING NO: 27-588
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PROJECT NO: 1169	DRAWING NO: 27-588							

APPENDIX 8

Developer's request to engage S203



HERBERT
SMITH
FREEHILLS

The City Surveyor
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For the attention of Simon McGinn

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Our ref
2461/6771/30958296
Your ref

Date
28 August 2018

Dear Sirs

6-8 Bishopsgate and 150 Leadenhall Street - Section 203 Housing and Planning Act 2016

We act for MEC London Property 2 (General Partner) Limited as general partner of MEC London Property 2 LP (the "Developer"), the owner of the site located at the corner of Bishopsgate and Leadenhall Street with the address 6-8 Bishopsgate and 150 Leadenhall Street (the "Site"). For reference, **Appendix 1** to this letter shows the Site edged in red.

The Developer has been working towards the comprehensive redevelopment of the Site for over five years. Detailed planning permission was granted by the City on 17 December 2015 (reference: 15/00443/FULEIA) for the comprehensive redevelopment of the site; this was accompanied by a section 106 agreement of the same date. The City subsequently resolved on 3 October 2017 to grant planning permission (pursuant to application 17/00447/FULEIA) for an enlarged version of the 2015 scheme (hereinafter referred to as the "Development") which involves the redevelopment of the Site to provide a taller building than previously consented, subject to completion of a section 106 agreement (which is currently being finalised between the Developer and the City and which is expected to complete shortly). **Appendix 2** to this letter provides background on the scheme and commentary on market conditions.

The Development impacts on the rights of light of a number of neighbouring property interests, as is common for City redevelopment schemes. The Development would also breach a restrictive covenant which burdens part of the Site. The Developer has been seeking to agree terms with the owners of affected properties since 2014. Whilst the Developer has agreed terms with 45 of the affected parties (and is currently confident it eventually will agree terms in relation to the vast majority of the outstanding negotiations), so far agreements remain outstanding on 41 interests. Of these, 19 interests owned by seven parties are proving particularly complex and slow to resolve (further detail on this is set out below). Accordingly, for the reasons described in this letter, the Developer now considers that the inability to remove the potential injunction risks associated with the rights of light and restrictive covenant enjoyed by these seven parties to be the principal

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impediment to the delivery of the Development within the preferred construction programme. In this regard the Developer has come to the conclusion that the timely delivery of the Development will only be possible with the City's assistance in overcoming these potentially injunctable restrictive covenant and rights of light claims.

We are therefore writing to you, on behalf of the Developer, to ask if the City would be prepared to acquire an interest in the Site for the planning purpose of facilitating the Development, which would result in section 203 of the Housing and Planning Act 2016 (the "2016 Act") applying to the Development.

If section 203 were to apply to the Development, this would have the effect of overcoming potentially injunctable rights of light and the breach of the restrictive covenant.

The Development and its benefits

The detailed planning permission granted on 17 December 2015 (reference: 15/00443/FULEIA) authorised the following development of the Site:

"Demolition of existing buildings and redevelopment to provide a new building comprising lower ground and basement levels (including part basement mezzanine), ground and mezzanine levels plus part 8, part 20 and part 40 storeys plus plant [18S.1m AOD to provide office (Class 81) use [70,053 sq.m GEA, flexible shop/cafe and restaurant (Class A1/ A3) uses [418 sq.m GEA) at part ground floor and mezzanine levels and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [235 sq.m GEA] at part ground floor and mezzanine levels; and a publicly accessible roof top pavilion (sui generis) [795 sq.m GEA] at level 40; the provision of hard and soft landscaping. [TOTAL 71,501 sq.m GEA]."

As referred to above, the Developer subsequently applied for planning permission (under reference: 17/00447/FULEIA) for the Development, which is similar to the consented scheme save that the Development provides a taller building. The planning application seeks consent for the following development:

"Demolition of existing buildings and the erection of a new building comprising lower ground level, three basement levels, ground floor plus part 10, 25 and 51 storeys including plant [221.2m AOD] to provide office (Class B1) use [85,892 sq.m GEA], flexible shop/cafe and restaurant (Class A1/ A3) uses [445 sq.m GEA] at part ground floor and level 1 and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [199 sq.m GEA] at part ground floor and level 1; The provision of a publicly accessible roof top viewing gallery (Sui Generis) [819 sq.m GEA] at level 50 with dedicated entrance at ground floor level; the provision of hard and soft landscaping. [TOTAL 87,355 sq.m GEA]."

The City's Planning and Transportation Committee resolved to grant planning permission for the Development subject to entry into a section 106 agreement and referral to the Mayor of London pursuant to Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008.

This letter relates to the Development rather than the previously consented scheme. This is because the Developer intends to construct the larger building.

The existing commercial office buildings on the Site were constructed in the late 1970s, are beyond their economic life and are not viable for refurbishment. Accordingly, the existing buildings are



vacant and in the process of being demolished. The Developer intends to complete demolition in time to start construction in December 2018, with completion due in 2022.

The Site is within the City's Eastern Cluster of tall buildings and the Development supports the strategic objectives of the City of London and would support the economic policies of the London Plan, Core Strategy and Local Plan. The Development would provide:

- an iconic building designed by Wilkinson Eyre providing 85,892 sq m of new Class B1 floorspace with active frontages at ground floor level along pedestrian routes, whose sculptural design creates a prominent juxtaposition within the townscape that is considered to create a positive relationship with the new generation of contemporary office developments in the Eastern Cluster;
- flexible shop, café and restaurant uses providing 445 sq m of Class A1/A3 retail floorspace at part ground floor and level 1;
- flexible shop, café, restaurant and office uses providing 199 sq m of Class A1/A3/B1 floorspace at part ground floor and level 1; and
- a roof top pavilion comprising a publicly accessible viewing gallery and tenant meeting rooms, providing 819 sq m at level 50 with dedicated entrance at ground floor level.

These benefits of the Development are considered in turn below.

Office Component

The Development will provide 85,892 sq m of the highest quality new office accommodation of an appropriate density, size and configuration to better suit the needs of future business occupiers. This results in an additional 52,718 sq m of B1 office floorspace over the existing buildings on the Site.

The delivery of office uses on the Site is supported by planning policy. The Site falls within the City's Eastern Cluster and London's Central Activities Zone (the "CAZ"). The London Plan strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and supports London's continuing function as a World City. Additional office floorspace is required in the City to deliver the scale of growth anticipated in the London Plan (35.6% between 2011 and 2036) and contribute to the maintenance of London's World City status.

The City's Core Strategy and Local Plan policies support this objective by aiming to increase the City's office floorspace by 1,150,000 sq m over the period 2011-2026 to provide an expected growth in workforce of 55,000. Further, Local Plan policy encourages the provision of large office schemes, particularly in the Eastern Cluster, identifying this area as the main focus for future office development and new tall buildings providing high quality floorspace to meet the varied needs of office occupiers and attract new investment in the City.

The Developer recently carried out a study of lease breaks and expiries for City-based companies who are likely to be interested in taking space in the Development, provided it is delivered within the currently anticipated programme. The Developer has identified 23 target parties currently in occupation of 50,000 sq ft or greater, and providing a total in excess of 3.6 million sq ft of likely demand, underlining the economic need for significant new development in this location. A delay in the development programme would mean that the project would be unable to accommodate the



space requirements generated by these events. The amount of new and refurbished stock set to be delivered in the City in 2018-19 totals c. 2.55 million sq ft, which is low when compared to the long run average take-up of c. 6 million sq ft. Supply will continue to be constrained post-Brexit. On this basis, the Developer believes that delivery of the Development in 2022, in line with the current programme, is a key strategic benefit for the City.

The Development is a rare opportunity to provide the higher levels of service and amenity that occupiers expect today. The Developer and its professional team have carried out extensive international research into the future occupier service and amenity requirements. Their research shows that 8-10 per cent of the space of future projects will be given over to occupier amenity in the shape of food and beverage, fitness, club lounges, serviced offices and auditorium/conference facilities. The current detailed design work on the Development anticipates extensive occupier amenity to cater for this demand. The Development's floorplates will range from 8,000 sq ft to 20,000 sq ft and will appeal to a broad occupier profile and a wide range of different business sectors from the City and more widely throughout Central London.

In this regard the Developer considers that, by meeting such demand for new, high quality office floorspace within the preferred construction programme, the Development would contribute to the economic well-being of the City's area.

Flexible Retail Component

The Development proposes two flexible units, comprising one unit of 445 sq m of flexible retail uses (Use Class A1/A3) at part ground floor and level 1 and a second unit of 199 sq m of flexible shop/café/restaurant/office (Use Class A1/A3/B1) at part Ground floor and level 1.

The inclusion of retail development within the application site is supported throughout the City's Local Plan, and the retail uses within the Development will respond to the City's policy aims of providing active frontages and vibrancy, as well as amenity to City workers, by complementing the nearby Leadenhall Market.

For these reasons the Developer considers that the retail provision within the Development would contribute to the economic and social well-being of the area.

Rooftop Viewing Gallery

In accordance with policy 7.7 of the London Plan and policy DM10.3 of the Local Plan, the Development includes a new publicly accessible viewing gallery, as well as tenant meeting rooms and catering facilities, within a pavilion at levels 48 to 51. The public would be able to access the viewing gallery free of charge during opening hours, with up to 50 members of the public able to be accommodated at any one time. The viewing gallery has the potential to become a very special facility for the building and the locale, both as a key amenity which will attract occupiers to the Development, and for the wider public good.

The viewing gallery would contribute significantly to the social and economic well-being of the area.

Other Public Benefits

In addition to the public benefits of the Development described above, the scheme will also provide the following public benefits, which the Developer considers would contribute to the economic, social and environmental well-being of the area:



- key sustainability and energy efficiency measures are incorporated into the Development in order to achieve an 'excellent' BREEAM rating and a significant reduction in potential carbon dioxide emissions;
- community infrastructure levy receipts in respect of the planning application for the taller building (which is subject to both the Mayoral and the City's CIL regimes); and
- a substantial package of benefits secured through the section 106 agreement, including:
 - financial contributions towards transport, affordable housing, local training and employment, carbon offsetting and security (up to approximately £1.45 million in total); and
 - provision of highway works with a value of approximately £2.5 million to widen the pavement adjacent to the new building by removing the left hand turn lane at the junction of Bishopsgate and Leadenhall Street.

Restrictive covenant

Part of the Site bears the burden of a restrictive covenant in favour of 145/146 and 147/148 Leadenhall Street. The restrictive covenant prohibits the construction of any building, wall, fence or other structure which exceeds 17.5 metres above Ordnance Datum (temporary scaffolding or plant excluded) on the land shown hatched green on the plan at **Appendix 3** to this letter (the "**Burdened Land**").

This restrictive covenant constitutes a constraint on the development of part of the Site. Accordingly, the Developer has been trying for more than four years to negotiate a release from the restrictive covenant, in order to be able to develop the Burdened Land without complying with its terms.

Despite the Developer's efforts to negotiate a release of the restrictive covenant, the Developer has just received a counter proposal to two offers made over the last 7 months. This offer is not acceptable to the Developer, and negotiations are continuing.

Rights of light

Waldrams have been advising the Developer on the impacts of the Development on light levels enjoyed by neighbouring properties. In May 2017, having carried out the relevant technical analysis, Waldrams began to negotiate settlements with affected owners on behalf of the Developer. Waldrams identified 86 property interests with rights of light infringements (45 of which are considered to sustain potentially actionable alterations in light) as a result of the Development. A list of these 45 property interests is provided in **Appendix 4** to this letter.

As a result of these negotiations, the Developer has successfully agreed or completed deeds of release in respect of 45 properties out of the 86 properties affected. The Developer will honour the highest offers made in each case to date.

Further details on the status of negotiations can be provided upon request.



Why the City's intervention is needed now?

While the Developer is confident about eventually being able to reach commercial agreement with a majority of the outstanding parties, as matters stand the Developer will be unable to achieve its programme for redevelopment of the Site, given the sheer number of transactions and negotiations still to be concluded.

Further, in order to provide a scheme which satisfies planning policy and market requirements and which is viable to deliver, some infringements of rights to light and the restrictive covenant are unavoidable. Impacts on rights of light enjoyed by neighbouring properties are a common feature of City developments – even modest buildings often result in infringements. Likewise, restrictive covenants often feature on titles to land and prevent redevelopment.

The following images are included within **Appendix 2**: (i) a drawing showing the envelope of the Development; and (ii) a cutback drawing showing the extent of changes to the design of the Development that would be required in order to avoid any breach of rights of light and the restrictive covenant. These changes, as demonstrated by the cutback drawing, would significantly alter the appearance of the Development and result in a substantial loss of floorspace, effectively only replacing the existing building on the Site. Such changes would render the Development unviable (and there is a real risk that planning permission would not be granted for such a proposal).

Accordingly, in the Developer's opinion the public benefits of the Development cannot be achieved without infringing these rights. There is no viable scheme which could be delivered on the Site which would meet the City's planning aspirations for the Site and also avoid the rights of light and restrictive covenant infringements; and (irrespective of viability) any such scheme would not be capable of delivering the public benefits that the Development will provide.

The Developer intends to complete demolition of the existing buildings on the site in time to start construction in December 2018 and complete the Development in 2022. The Developer's commitment to the Development is demonstrated by the fact that it has achieved full board approval to build-out the Development, subject to de-risking third party rights issues. The Developer has already been put to a total cost of approximately £42.5million. This includes securing the 2015 planning permission and promoting the 2017 planning application, securing vacant possession of the Site, making arrangements with adjoining owners in relation to other neighbourly matters and commencing the demolition of the existing buildings. In order to maintain this programme, commitment to the ground works and foundations packages totalling approximately £40-45million needs to be made in the 4th Quarter of 2018. The Developer is not able to make this commitment whilst there is a risk to this investment that the Development could be enjoined by a third party.

The injunction risks posed by the outstanding restrictive covenant and rights of light negotiations are the only remaining impediment to the Development being brought forward by the Developer. Furthermore, the Developer is not able to negotiate any pre-lets unless these injunction risks are removed and the Development can proceed to construction. For tower buildings in particular, the longer construction period means that pre-lets are unlikely to be agreed before ground works are well under way. The significant costs that would need to be committed in order to bring forward the major construction works necessary to complete the Development and bring it to the market mean that the Development cannot be brought forward until all third party rights issues are resolved.



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As explained above, to date deeds of release have been secured or terms agreed for 45 property interests. The Developer considers that it has made all reasonable efforts to secure the release of the restrictive covenant and all potentially actionable rights of light, and continues to negotiate, but has come to the conclusion that the seven remaining interests referred to above (the six rights of light and the restrictive covenant) cannot all reasonably be released by agreement with the affected owners in time to enable substantive construction works to commence by December 2018.

Furthermore, in relation to the remaining 45 property interests in respect of which terms have been agreed in principle, and the additional properties in respect of which the Developer is confident terms will be agreed, whilst the Developer is prepared to honour the terms of any such agreements in principle reached with affected owners and is confident that deeds of release can be secured in time to meet the Developer's construction programme, until such formal deeds of release have been entered into there remains a risk that, for example, ownership of a property could change which would most likely frustrate progress.

The Developer will continue to negotiate with the seven outstanding parties referred to above, and, to the extent that agreement in principle is reached with any of those relevant owners prior to the City acquiring an interest in the Site, the Developer would be prepared to honour such terms.

Conclusion

For the reasons set out above, the Developer wishes the City to consider acquiring an interest in the Site, which would result in section 203 of the Housing and Planning Act 2016 applying to the Development. If section 203 were to apply to the Development, this would have the effect of overcoming the restrictive covenant and rights of light which would otherwise prevent the Development from proceeding.

For the reasons stated in this letter, the Developer considers that facilitating the delivery of the Development is in the public interest and that it satisfies the relevant statutory tests in that it would contribute to the promotion or improvement of the economic, social and/or environmental well-being of the City's area. The public benefits of the Development cannot be achieved without giving rise to infringements of the restrictive covenant and potentially injunctable rights of light. The restrictive covenant and rights of light cannot reasonably be released by agreement with affected owners (in this regard the Developer considers it has made all reasonable attempts to secure such releases); this risk of injunction is preventing the Development from being carried out and, in particular, preventing construction from being able to commence in December 2018. It is submitted that in the event that section 203 applies to the Development, thereby overcoming the restrictive covenant and rights of light, this would be proportionate given the public benefits of the Development (and taking into account that compensation would be available to those affected).

Should you require any further information please do not hesitate to contact Matthew White on 020 7466 2461 (matthew.white@hsf.com) or Alexandra Rhodes on 020 7466 2423 (alexandra.rhodes@hsf.com).

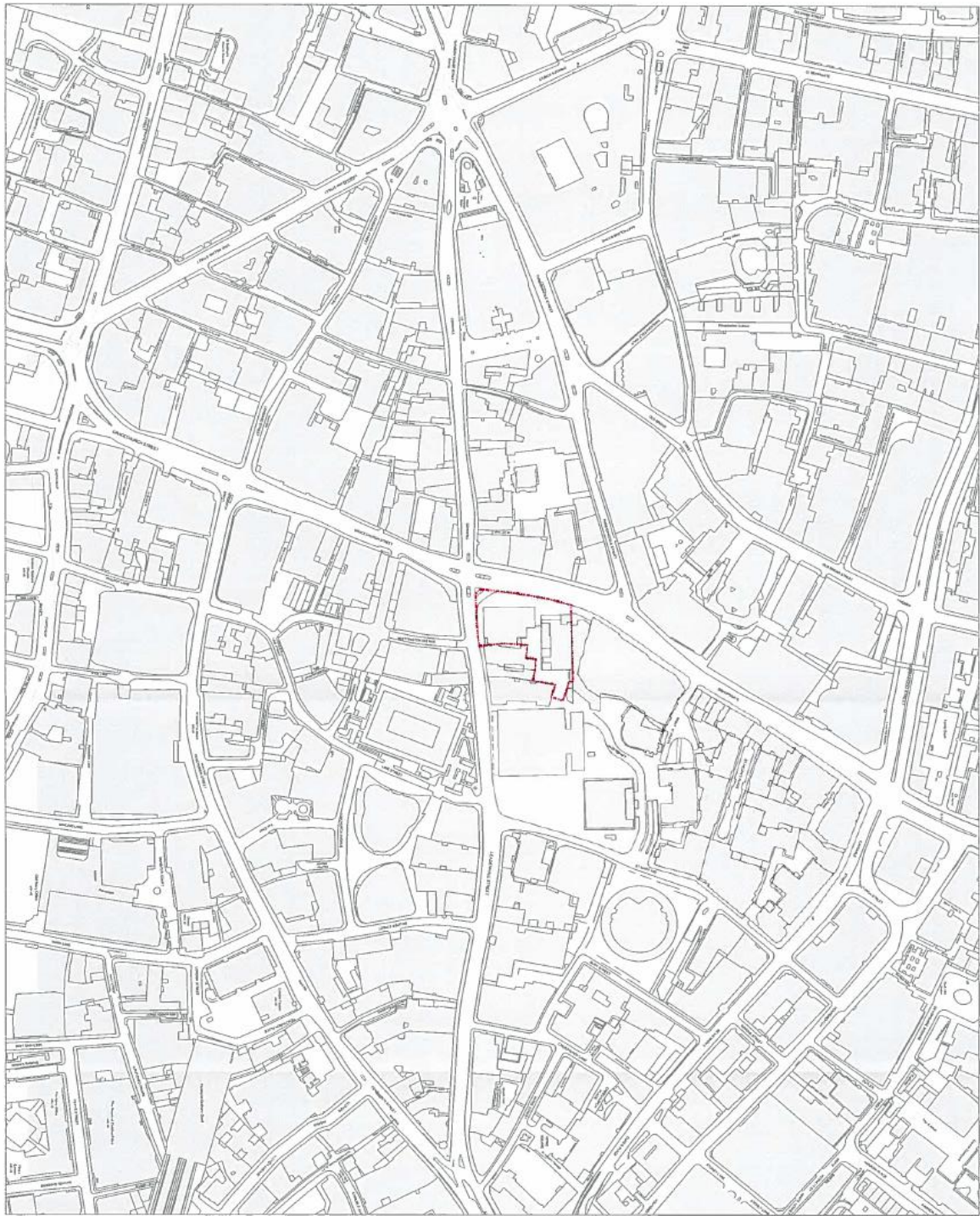
Yours faithfully


Herbert Smith Freehills LLP



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Planning Application No: 11/280
 Planning Application Fee: £1,280
 Planning Application Fee: £1,280

FOR PLANNING
 00397-WEA-XX-XX-PA-0000

Planning Application Fee
 Site boundary

11/280

11/280

Appendix I

6-8 BISHOPSGATE AND 150 LEADENHALL STREET, EC2

BACKGROUND NOTE TO SUPPORT REQUEST FOR S203 RESOLUTION

28th June 2018

Situation Overview:

About the Developer

Mitsubishi Estate London ("MEL") is the London division of one of Japan's biggest quoted property companies with net assets of £12.6 billion on a consolidated basis as at 31st March 2018. They have extensive experience of development and investment in London. This is their 6th development project in the City of London. Recently, they completed the award winning 8 Finsbury Circus, EC2, which is let to two previous West End tenants (GAM and Rathbones). Other previous development projects in the City include the redevelopment of Paternoster Square.

Stanhope is acting as MEL's Development Manager. Stanhope has partnered with MEL on all their City of London projects to-date. Stanhope has 30 years' experience of development within central London. This includes 50 buildings within the City of London alone.

Project and Status

The City of London have resolved to grant MEL planning permission, subject to signing s106 (due to complete shortly), for a new iconic Wilkinson Eyre designed 50 storey office tower in the heart of the City at the corner of Bishopsgate and Leadenhall Street. The planning permission will authorise variations to the scheme design for the site which was originally granted planning permission in December 2015 (ref: 15/00443/FULEIA)

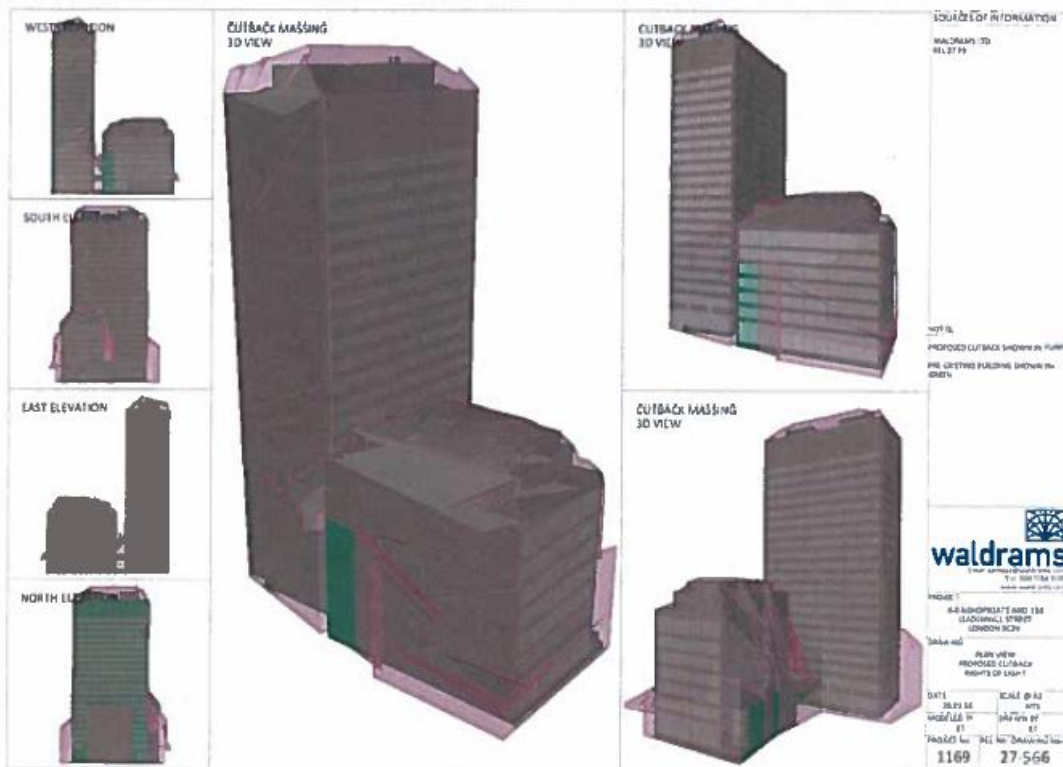
The building is set to provide 600,000 sq ft of the highest quality office accommodation with floor plates ranging from 8,000 sq ft to 20,000 sq ft and amenities which all appeal to a wide range of City and wider central London occupiers (for more details please see below). It has capacity for approximately 5,000 workers.

Detailed design is now complete and demolition is under way.

Programme

Demolition is set to continue until December 2018 with ground works to proceed immediately thereafter and practical completion targeted for Q4 2022 (see below for the context of this programme in relation to the market).

In order to maintain this programme, commitment to the ground works and foundations packages totalling approximately £35 million needs to be made in the 4th Quarter of 2018. MEL is not able to make this commitment whilst there is a risk to this investment that the scheme could be enjoined by a third party. The plan below highlights the risk from injunction, illustrating that MEL would effectively only be able to replace the existing buildings if all third party rights were respected.



Clearly this would not be a viable proposition and MEL would not proceed with such a development. Failure to overcome the third party restrictions affecting the site would instead mean that once demolition works are complete at the end of this year, the site would remain vacant and in an unsightly condition as a stalled construction project.

Mitsubishi Estates Board Approval

MEL have achieved full board approval to build-out the scheme, subject to the de-risking third party rights issues.

Third Party Rights

Overall, MEL's team have identified **86 parties** where they need to reach rights of light agreements in order to deliver the project and an additional **one party** where a restrictive covenant needs to be removed.

Approaches to affected parties were commenced 13 months ago. Of these 87 parties, terms have been agreed and/or deals signed with 40. Commercial proposals have been made to all other parties. Save in the few cases where injuries have more recently been identified, initial offers were made on outstanding injuries between 3 and 8 months ago, with subsequent higher offers made to many parties.

Whilst we are confident about eventually being able to reach commercial agreement with the vast majority of the outstanding parties, as matters stand, MEL will be unable to achieve their programme for the redevelopment of the site for the following reasons:

- i. There are circa. six parties where we remain a commercially a considerable distance apart and whereby agreement is not likely to be reached in time to meet the required development programme. This is not simply due to a disagreement about compensation. It is to do with the legal complexity and interpretation of who has the rights within a particular building and, therefore, how the compensation should be split between freeholder, leaseholder and occupier.

- ii. A number of the negotiations are with surveyors who need to take instruction from overseas investors. Responses are often significantly delayed with offers remaining unresponded to over a number of months, in large part it seems because of unfamiliarity with the legal position of rights to light in this country and the methods of calculating compensation. This is also the case for the restrictive covenant which needs to be acquired and where we have had no response to two offers over the last seven months.
- iii. The sheer volume of transactions required means that a considerable number of the negotiations are unlikely to be concluded by the time MEL need to commit to the initial works packages.

Without City support to help de-risk these 3rd party rights by resolving to use s203 if required, there will necessarily be a significant delay between demolition and start of construction, leaving a cleared site at one of the key junctions in the City.

Set out below is the market and economic rationale for MEL's intent to proceed with the development straight away following on from demolition and why they therefore are requesting the City's support on third party rights.

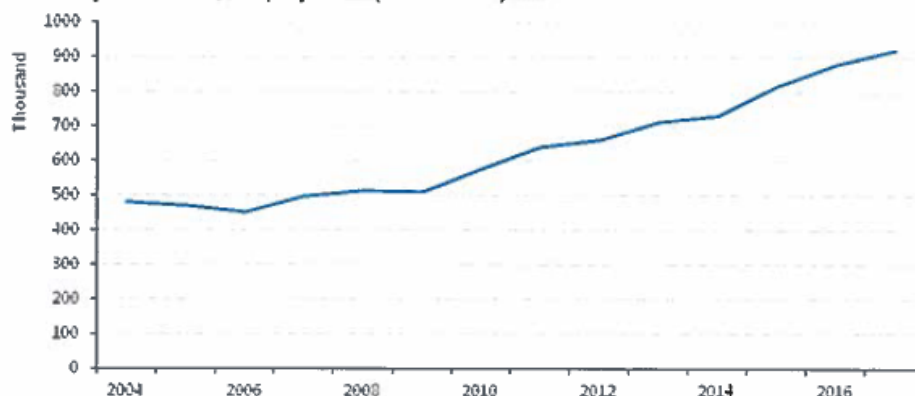
General Market Background

The Central London office market remains robust, despite the current relatively uncertain macro political and economic environment in the UK.

We are strong advocates for the future of Central London as a world-leading financial, tech, professional services and commercial centre continuing over the long-term. There are many reasons for this, not least talent pool, trusted legal system, advantageous time zone, quality of office stock, connectivity, scale and a genuinely international market.

Below is empirical evidence obtained from the national Office of Statistics as to both the total growth in City of London Employment as well as growth rates in particular business sectors.

Total City of London Employment (2004-2017)



2017 City of London Employment by Business Sector (including growth from 2009)

	2017	% share	Growth %
A: Agriculture & fishing	0	0.0	0.0
B,D,E: Energy & water	6,200	0.7	265
C: Manufacturing	22,900	2.5	141
F: Construction	76,800	8.3	210
G,I: Distribution, hotels & restaurants	87,500	9.5	201
H,J: Transport & IT, Communication	131,600	14.3	113

K-N: Banking finance & insurance etc.	417,600	45.3	38
O-Q: Public admin education & health	133,300	14.5	107
R-U: Other services	45,500	4.9	165

It is widely acknowledged that there is an emerging supply and demand imbalance, with an historically low level of supply of Grade A offices and a limited pipeline of offices under construction. This trend is due to continue for the foreseeable future, in significant part because of continuing funder caution to back new development given the macro political uncertainty.

London's major central business districts currently have a 4.8% overall vacancy rate compared to a long-term average of 5.5%. In the City, the vacancy rate is 4.7% compared to the long-run average of 6.4%. Just 0.6% of this is new-build accommodation. The trend in vacancy rates is continuing downwards with a shortage of new stock being completed.

This low supply is coupled with healthy take-up levels from occupiers across all size bands in Central London, particularly for pre-leasing prior to completion where we are experiencing very active demand, in significant part because of occupier concerns about the lack of marketable future supply. This is further reducing the available pipeline of future office development. Recent examples of this trend on scheme underway in the City include SMBC taking 200,000 sq ft at 100 Liverpool Street, EC2 Sidley Austin taking 100,000 sq ft at 70 St Mary Axe, EC3 and IDG taking 120,000 sq ft at 135 Bishopsgate, EC2.

City of London comparable high-rise schemes:

The three most recent completed tower buildings nearby to this site illustrate that there is strong tenant demand for high quality tower developments.

- **100 Bishopsgate, EC2:**
 - Being developed by Brookfield.
 - First letting achieved post demolition works commencing, during enabling works.
 - Pre-leases agreed with RBC, Jefferies, Freshfields, Equinox and Paul Hastings.
 - 85% pre-leased so far, with Practical Completion in May 2019.
 - In Heads of Terms discussions on the remainder of the building, and could be 100% pre-leased by PC.
- **The Leadenhall Building, EC3:**
 - Developed by British Land and Oxford Properties.
 - First letting achieved post demolition works being completed.
 - Initial pre-lease signed to Aon (180,000 sq ft) and Amlin (120,000 sq ft).
 - Highest rent achieved of £107.00 per sq ft to Kames Capital (existing tenant).
 - Approx. 70% leased prior to Practical Completion.
 - All now leased, approx. 6-9 months post Practical Completion.
- **20 Fenchurch Street, EC3:**
 - Developed by Land Securities and Canary Wharf Group.
 - First lettings achieved post commencement of construction works.
 - Pre-leases signed to numerous tenants including RSA, Liberty Syndicates, Jane Street Capital.
 - Highest rent achieved of £77.50 per sq ft to DBRS.
 - Approx. 93% leased prior to Practical Completion.
 - All leased within 3 months post Practical Completion.

22 Bishopsgate is the most recent tower scheme under construction, which already has significant pre-let interest (with rumours of pre-letting being agreed on approximately a third of

the building to the likes of Hiscox, Amlin, Beazley and JLL) and which isn't due for completion until end of 2019.

Pre-Leasing: Bias Towards Schemes Under Construction:

As can be seen by the analysis below, whilst there are examples of pre-lettings being achieved prior to the commencement of construction, this is difficult to achieve and is more common place on larger deals with occupiers who have specific specialist requirements (e.g. require large trading floors). For tower buildings in particular, the longer construction timeframe means that pre-lets are unlikely to occur before ground works are well underway.

It is much more common to achieve a letting during construction of a project because one of the most important factors for successfully achieving a pre-letting prior to practical completion is overall deliverability and lead-in time.

Records of Central London leasing activity for large transactions show over the past 15 years specific activity within the City as follows;

	OFF PLAN PRE-LET	PRE-LET DURING CONSTRUCTION	POST PRACTICAL COMPLETION LETTING	Total
Number of City of London lettings in excess of 100,000 sq ft				
2011-2016	5	9	6	20
2006-2016	11	19	13	43

On this basis, even for larger lettings therefore, 75% have been transacted on buildings under construction completed. Recent evidence shows us that pre-lettings (during construction) in high-rise buildings are getting smaller, as evidenced at 20 Fenchurch Street where the average deal size was approx. 60,000 sq ft, with no letting in excess of 80,000 sq ft. This is important in the context of the typical lower floor size at 6-8 Bishopsgate of only 25,000 sq ft.

The City needs a rolling supply of new stock committed in the construction phase to satisfy the market, where the majority of even large-scale lettings are only committed to developments underway. Given the anticipated slow commitment to speculative starts of developers because of the macro uncertainty and lack of availability in the pipeline (see below), MEL's board approval to build-out, subject to de-risking the third party position described above, would be a significant positive for the City.

Tenant Demand:

The design of 6-8 Bishopsgate offers a range of floor sizes that will appeal to a broad occupier profile and a wide range of different business sectors from within the City and more widely throughout Central London (for example, in respect of the recently completed Angel Court tower, 11 of the 14 new tenants are moving from outside the City).

We believe the "core" target sectors will be as follows:-

- Boutique Investment Banking
- Brokers/Traders
- Representative Banks
- US Legal and US/UK hybrids
- Management Consultancy
- Major Corporates
- Opportunity Funds
- Fund Management / Wealth Management
- Insurance Companies / Underwriters
- Fintech

- Other digital businesses
- High-value SMEs

In particular, we believe the Insurance sector will be attracted to the scheme, due to its proximity to the Lloyds Building. The dual entrance off both Bishopsgate and in particular Leadenhall Street will be a significant advantage here.

We have recently carried out a study of specific Lease Breaks and Expiries for City-based companies who are likely to be interested in taking space in this scheme provided it is delivered within the currently anticipated programme. The table identifies 23 target parties currently in occupation of 50,000 sq ft or greater and providing a total in excess of 3.6 million sq ft of likely demand, underlining the economic need for significant new development in this location. A delay in the programme would mean that the project would be unable to accommodate the space requirements generated by these events.

Shared Amenity

Increasingly, Central London occupiers are expecting high levels of service and amenity. There is particular opportunity for this with a multi-tenanted high-rise building, where scale, high value and prominence allow developers to offer these enhanced services and amenities.

This has worked successfully within other earlier generation high rise buildings in London (including the likes of Tower 42, The Gherkin, Heron Tower One Canada Square and Citypoint). However, the occupiers are now requiring a much enhanced offer than available in these first generation London towers, as anticipated by 22 Bishopsgate. Opportunities to deliver this enhanced offer remain in short supply.

MEL and its professional team have carried out extensive international research into the future occupier service and amenity requirement. Our research shows that 8-10% of the space of future projects will be given over to occupier amenity in the shape of f&b, fitness, club lounges, serviced offices, auditorium/conference facilities. 6-8 Bishopsgate has been designed to deliver this high level of amenity to fully meet future occupiers' needs.

The very top of the building is to have a sky gallery, which will be open to the public and reserved at different times for commercial use, with some form of catering facility. This has the potential to become a very special facility for the building, both for the wider public good and as one of the key amenities which will attract occupiers to the scheme.

Development Pipeline:

We have carried out a study on the City Development Pipeline, including all proposed schemes of more than 75,000 sq ft. There are a number of observations to highlight from this analysis:

- i. The majority of the stock set to be delivered in the City during 2018 and 2019 is already pre-committed – 57%.
- ii. The amount of new and refurbished stock available over these two years totals circa. 2.55 million sq ft (or 1.27m sq ft per year), which is low compared to a long-run average take-up in the City of circa. 6 million per sq ft.
- iii. Post the EU referendum, several schemes have been delayed or are under review. As a result future supply will be further constrained. For example, in January 2017 supply forecast to be completing in 2022 totalled c 4.50 million square feet. Looking at the same analysis of June 2018, such forecast supply now only totals 3.0 million square feet (i.e. a reduction of a third) and this is expected to reduce further as developers continue to delay starting on-site.
- iv. Over 50% of supply for the years 2020 and 2021 will be refurbished second hand stock. It is therefore important that new high quality development stock capable of being constructed during this period is permitted to do so.

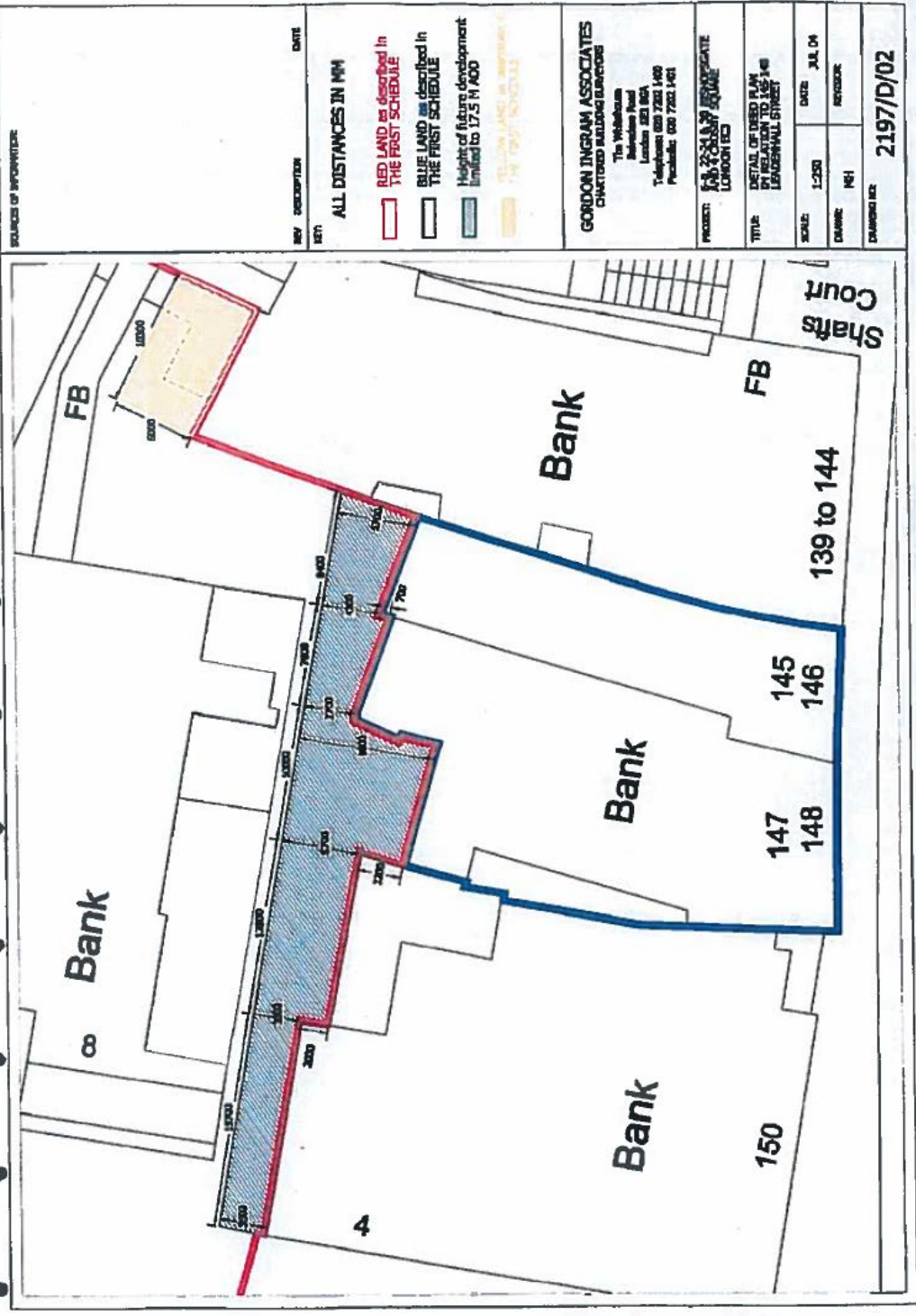
Summary and Key Conclusions:

- i. Despite the macro political and economic uncertainties, tenant demand across London remains resilient underpinned by London's many advantages as a global Gateway City;
- ii. Current vacancy rates are already below the long-term averages and are continuing to fall;
- iii. There is shortage of unlet new and refurbished stock being delivered in the next two years, which will likely further reduce available stock, particularly given the currently active pre-let market;
- iv. Some proposed development projects are likely to face ongoing delays as investors continue to postpone decisions, pending clarification of the current macro political and economic uncertainties;
- v. Leasing evidence from recent tower schemes show their popularity with occupiers and this is set to continue with the next generation, including 6-8 Bishopsgate, as they provide increasing amenity for occupiers.

Based on the points highlighted in this note, we believe that the development of 6-8 Bishopsgate within the target programme set-out earlier (i.e. starting ground work in the 4th quarter of 2018 to deliver to 2022), is a key strategic benefit for the City. In a market where vacancy rates are already low and the development pipeline is likely to be constrained, particularly for new-build developments, 6-8 Bishopsgate will deliver a significant supply of the highest quality of accommodation with the amenity that occupiers increasingly require.

Overcoming third party rights within the next three to four months is therefore essential to enable the development to proceed, the public benefits of the development to be realised and for the new building to be completed in time to meet the identified tenant demand for new high specification office floor space in the City. Based on the status of negotiations with third party beneficiaries as described above, we have concluded that the use of the City's section 203 powers will be necessary to achieve this.

refer to



150 Leadenhall Street and 6/8 Bishopsgate, EC2

Proposed Redevelopment

Identified Properties with Actionable Rights to Light or Restrictive Covenant Positions

No.	Address	Tenure
1		Freehold
2		Leasehold
3		Freehold
4		Freehold
5		Freehold
6		Freehold
7		Freehold
8		Freehold
9		Freehold
10		Freehold
11		Freehold
12		Freehold
13		Freehold
14		Freehold
15		Freehold
16		Freehold
17		Freehold
18		Freehold
19		Freehold
20		Freehold
21		Freehold
22		Freehold
23		Freehold
24		Freehold
25		Freehold
26		Freehold
27		Freehold
28		Leasehold
29		Freehold
30		Freehold
31		Freehold
32		Freehold
33		Freehold
34		Freehold
35		Leasehold
36		Freehold
37		Freehold
38		Freehold
39		Freehold
40		Leasehold
41		Freehold
42		Freehold
43		Freehold
44		Freehold
45		Freehold

Report – Planning and Transportation Committee

Rights of Light Issues Affecting Development

To be presented on Thursday, 8 December 2016

*To the Right Honourable The Lord Mayor, Aldermen and Commons
of the City of London in Common Council assembled.*

SUMMARY

In 2011 the Court of Common Council adopted an approach to the exercise of planning powers in relation to rights of light, easements and other rights attached to land. This approach stated that, in appropriate cases, planning powers may be used to assist delivery of developments in the City which achieve public benefit by removing the risk of the construction of such developments being prevented by injunction. Following a recent change to statutory provisions in Section 203 of the Housing and Planning Act 2016 (“S.203”), it is proposed that Members continue to support this approach.

The recommendation was supported by your Planning and Transportation Committee on 28 November 2016.

RECOMMENDATION

That Members approve the continuation of the arrangements for exercising the Corporation’s powers to override rights of light and over rights under the new statutory provisions in Section 203 of the Housing and Planning Act 2016 (“S.203”) by resolving as follows:

- a) Acquisitions of interests in land under S.227 Town and Country Planning Act 1990 or appropriations for planning purposes, may be considered on a case by case basis in order to engage S.203 powers to allow developments to proceed (where they would otherwise be inhibited by injunctions or threats of injunctions prohibiting infringements of rights of light) subject to: (i) such development being in the public interest, such public interest being sufficient to justify interference with any private rights and proportionate; (ii) the relevant criteria being met (Appendix 1) (iii) all financial liabilities of the City being indemnified; and (iv) where feasible and appropriate in the circumstances of the case, prior consultation being carried out in accordance with paragraph 6 of this report.
- b) Where such acquisitions or appropriations are so considered on a case by case basis, the Planning and Transportation Committee be authorised to determine whether such acquisition or appropriation may be authorised.
- c) Where the Planning and Transportation Committee determine that such acquisition or appropriation be authorised they may delegate the determination of such matters as they see fit and the final decision to the Town Clerk, in consultation with the Chairman and Deputy Chairman of that

Committee. The matters to be determined by the Town Clerk may include (i) whether adequate attempts have been made to remove injunction risks by negotiating the release of affected rights of light by agreement; (ii) whether those entitled to rights of light are prepared by agreement (on reasonable terms and within a reasonable time) to permit infringements of those rights and (iii) the terms on which the acquisition or appropriation is to proceed.

MAIN REPORT

1. Due to the dense built form in the City and planning policy advocating efficient use of scarce land resources, developments and redevelopments within the Square Mile sometimes involve infringements of rights of light, and other rights.
2. Prior to 2010, injunctions were often avoided through developers agreeing with affected neighbours for the release of rights of light upon payment of compensation, allowing development to proceed. However, a court ruling in 2010 increased the risks of development being impeded due to Rights of Light infringements. In June 2011 the Court of Common Council agreed an approach towards assisting in the delivery of development using Section 237 of the Town and Country Planning Act 1990 (“S.237”) in appropriate cases and delegated decisions on whether to engage S.237 to the Planning and Transportation Committee and the Policy and Resources Committee. In December 2011 the Court of Common Council delegated decisions whether to engage S.237 to Planning and Transportation Committee alone, on the recommendation of the Policy and Resources Committee.
3. In July 2016, S.237 was repealed and a new, similar power was introduced in Section 203 of the Housing and Planning Act 2016 (S.203), aimed at addressing some minor issues/ambiguities about S.237, but not implementing any substantive change. Changes between S.237 and S.203 include: (i) S.203 is engaged where land is held by other public bodies (in addition to planning authorities); (ii) a previous exclusion for statutory undertakers is removed; (iii) an exclusion is provided for the National Trust/ National Trust land; (iv) S.203 is only engaged in circumstances where the authority “could acquire the land compulsorily” for the purposes of the building or maintenance work which is to be carried out; and (v) the S.203 powers are specifically limited to situations where the interference relates to the purpose for which the land was acquired/appropriated.
4. Given the introduction of new legislation, the 2011 resolutions relating to S.237 should be updated to cover the new provisions in S.203, if the City wishes to continue the general approach adopted in 2011.
5. In recognition of the City's local planning authority role in helping deliver development which meets planning objectives, it is considered appropriate that requests to implement land acquisition or appropriation arrangements which engage S.203 powers should continue to be considered on a case by case basis. It is expected that such requests should be supported by a full analysis which explains why exercise of the City's powers to acquire or appropriate are

necessary, and why there is a compelling case in the public interest to do so. It is expected that such requests will address the criteria developed to evaluate applications (Appendix 1). It is proposed that such requests should continue to be reported to Planning and Transportation Committee for decision, where it is considered in the public interest, such public interest being sufficient to justify interference with any private rights and proportionate, adopting the criteria and tests which have been in place since 2011.

6. It is also proposed that the policies developed for applications under S.237 in relation to compensation and consultation be continued under S.203, namely;

Compensation – The Upper Tribunal (Land Courts) to determine disputes in “diminution in value” payments. The City must however be satisfied prior to engaging S.237 (S.203) that adequate attempts have been made by the developer to remove injunction risks by negotiation.

Consultation –Wherever feasible and appropriate in the circumstances of the case the developer will be expected to demonstrate that rights holders have been appropriately advised of the proposed resolution, made aware of any report, and provided with a contact at the City to whom they can direct comments.

7. It is likely that agreement on the detailed terms on which an acquisition or appropriation should proceed would continue to be delegated by the Planning and Transportation Committee to the Town Clerk in consultation the Chairman and Deputy Chairman of the Planning and Transportation Committee. On occasion, decisions as to whether adequate steps have first been taken by the developer to remove the injunction risks by negotiation may also be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman. This reflects some of the past resolutions.
8. The recommended action is proposed in order to achieve planning purposes as expressed in local and national policy (see Appendix 2).

Appendices

Appendix 1: Criteria for acquisition/appropriation for the purpose of engaging SS.227/203

Appendix 2: Planning Policies

All of which we submit to the judgement of this Honourable Court.

DATED this 17th November 2016.

SIGNED on behalf of the Committee.

Christopher Michael Hayward
Chairman, Planning and Transportation Committee

CRITERIA

Introduction

It is recognised that the acquisition or appropriation of land to engage S.203 involve interference with human rights: namely, the right to peaceful enjoyment of possessions and, in the case of affected residential property, the right to respect for private and family life and home. This is the case notwithstanding that where such powers are exercised, compensation is payable. Therefore, such powers should not be exercised unless a number of criteria are satisfied and S.203 specifically provides that the authority to interfere with rights or breach restrictions conferred by the section will only apply in cases where the authority could acquire the land compulsorily for the purposes of the building or maintenance work. Whether the relevant criteria are satisfied will depend upon the site specific circumstances. The criteria, which must be carefully considered and weighed in each case, are set out at 1 – 2 below. They broadly require that the local planning authority be satisfied that there is a compelling case in the public interest for the exercise of the powers and interference with property rights and that the public interest to be achieved is proportionate to the interference with private rights which would result.

Criteria

1. There is a compelling case in the public interest that the powers conferred by section 203 of the Housing and Planning Act 2016 be engaged in order that the building or maintenance work or use proposed can be carried out within a reasonable time, and in particular, that:
 - (i) There is planning consent for the proposed development;
 - (ii) Acquisition or appropriation and consequent engagement of section 203 of the Housing and Planning Act 2016 will facilitate the carrying out of development, redevelopment or improvement on or in relation to land, and in particular the proposed development for which planning consent has been obtained, or similar development;
 - (iii) The development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental wellbeing of the authority's area and those benefits could not be achieved without giving rise to all of some of the infringements - therefore it is in the public interest that the land be acquired by the City or appropriated by them for planning purposes, so as to facilitate the development proposed or similar development.
 - (iv) There will be infringements of one or more relevant rights or interests as defined in section 205(1) of the Housing and Planning Act 2016 or breach of a restriction as to user of land which cannot reasonably be avoided;
 - (v) The easements to be interfered with cannot reasonably be released by agreement with affected owners within a reasonable time (and adequate evidence of satisfactory engagement, and where appropriate negotiation, has been provided to the City) ;
 - (vi) The ability to carry out the development, including for financial or viability reasons, is prejudiced due to the risk of injunction, and adequate attempts have been made to remove the injunction risks;
 - (vii) A decision to acquire or appropriate in order to engage section 203 of the Housing and Planning Act 2016 would be broadly consistent with advice given in the DCLG

Guidance on Compulsory Purchase (2015) (and any replacement thereof) so far as relevant.

- (viii) The use of the powers is proportionate in that the public benefits to be achieved so as to outweigh the infringement of human rights;
 - (ix) The developer has consulted with rights holders regarding the engagement of section 203 wherever feasible and appropriate in the circumstances of the case.
2. The authority could acquire the land compulsorily for the purposes of the building or maintenance work or the use of the land (and where the land in issue is currently owned by the authority it is to be treated for these purposes as not currently owned by the authority);

PLANNING POLICIES

The London Plan includes the following relevant policies:

- i) **Policy 2.10 “Central Activities Zone – Strategic Priorities” which says that the Mayor will and boroughs should sustain and enhance the City of London as a strategically important globally-oriented financial and business services centre**
- ii) **Policy 2.11 “Central Activities Zone – Strategic Functions” which says the Mayor will and boroughs should secure completion of essential new transport schemes necessary to support the roles of CAZ, including Crossrail, and realise resultant uplifts in development capacity to extend and improve the attractions of the Zone**
- iii) **Policy 4.2 “Offices” which says that the Mayor will, and boroughs should recognise and address strategic as well as local differences in implementing this policy to meet the needs of the central London office market by sustaining and developing its unique and dynamic clusters of “world city” functions and by encouraging renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility**

1 The City of London Local Plan includes the following policies:

- i) Under Implementation And Delivery it states that the City Corporation will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high quality development the City needs; and
- ii) Strategic Objective 1 which is “to maintain the City’s position as the world’s leading international and financial and business centre”
- iii) Core Strategy Policy CS1 which is: “To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London’s role as the world’s leading international financial and business centre, by:

- Increasing the City’s office floorspace stock by 1,150,000 m2 gross during the period 2011 – 2026 to meet the needs of projected long term economic and employment growth, phased as follows:

2011 – 2016:650,000 m2

2016 – 2021:250,000 m2

2021 – 2026:250,000 m2

A pipeline of at least 750,000 m2 gross office floorspace with planning permission but not yet commenced will be maintained to provide office occupier choice.

- Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers, protecting potential large office sites from piecemeal development and resisting development that would jeopardise the future assembly and delivery of large sites.
 - Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.
- iv) Policy DM 1.2 which is "To promote the assembly and development of large office schemes in appropriate locations".
- v) Policy DM 1.3 which is "To promote small and medium sized businesses in the City".
- vi) Policy DM 1.5 which is "To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services...".

Policy DM 10.7

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight

Supporting text paragraph 3.10.42 states that 'If a development is considered acceptable in planning terms and has planning permission, but it not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.'

Policy DM 10.8

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- Inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- Convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- Responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

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Committee:	Date:
Planning and Transportation	3 October 2017
Subject: 6-8 Bishopsgate And 150 Leadenhall Street London EC3V 4QT Demolition of existing buildings and the erection of a new building comprising lower ground level, three basement levels, ground floor plus part 10, 25 and 51 storeys including plant [221.2m AOD] to provide office (Class B1) use [85,892sq.m GEA], flexible shop/cafe and restaurant (Class A1/ A3) uses [445sq.m GEA] at part ground floor and level 1 and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [199sq.m GEA] at part ground floor and level 1; The provision of a publicly accessible roof top viewing gallery (Sui Generis) [819sq.m GEA] at level 50 with dedicated entrance at ground floor level; the provision of hard and soft landscaping. [TOTAL 87,355sq.m GEA].	Public
Ward: Lime Street	For Decision
Registered No: 17/00447/FULEIA	Registered on: 4 May 2017
Conservation Area:	Listed Building: No

Summary

Planning permission is sought for the construction of a 51 storey building (lower ground, three basement levels (including part mezzanine), ground floor, Mezzanine and 49 upper floors) providing office, retail (Class A1/A3) and a publicly accessible viewing gallery at level 50. The highest part of the building would be 221.3m AOD (203.8m AGL).

The new development would provide an additional 52,718sq.m (GEA) of office (Class B1) floorspace (85,829sq.m total), 445sq.m (GEA) of new retail floorspace (Class A1 or A3) and 199sq.m (GEA) of mixed retail or office (Class A1, A3 or B1) use at ground floor and mezzanine levels. There would also be a publicly accessible roof top pavilion (sui generis) of 819sq.m at level 50. The proposed development would provide a significant increase in flexible office accommodation, retail uses and publicly accessible space on this site, which would assist in meeting the needs of the financial and business services of the City as well as visitors.

The principle of redevelopment of this site to provide a tall building with a slightly increased footprint was established when planning permission (15/00443/FULEIA) for the demolition of the existing buildings and

redevelopment to provide a new building comprising lower ground and basement levels (including part basement mezzanine), ground and mezzanine levels plus part 8, part 20 and part 40 storeys plus plant [185.1m AOD] to provide office (Class B1) use [70,053sq.m GEA], flexible shop/cafe and restaurant (Class A1/ A3) uses [418sq.m GEA] at part ground floor and mezzanine levels and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [235sq.m GEA] at part ground floor and mezzanine levels; and a publicly accessible roof top pavilion (sui generis) [795sq.m GEA] at level 40 together with the provision of hard and soft landscaping [TOTAL 71,501sq.m GEA] was approved in 2015.

The proposal, due to its height and form would provide a distinctive building whose sculptural design creates a prominent juxtaposition within the townscape that is considered to create a positive relationship with the new generation of contemporary office developments in the Eastern Cluster.

The building would not be detrimental to the setting of nearby listed buildings and conservation areas or views from the Tower of London.

The proposals support the strategic objectives of the City of London and would support the economic policies of the London Plan, Core Strategy and Local Plan.

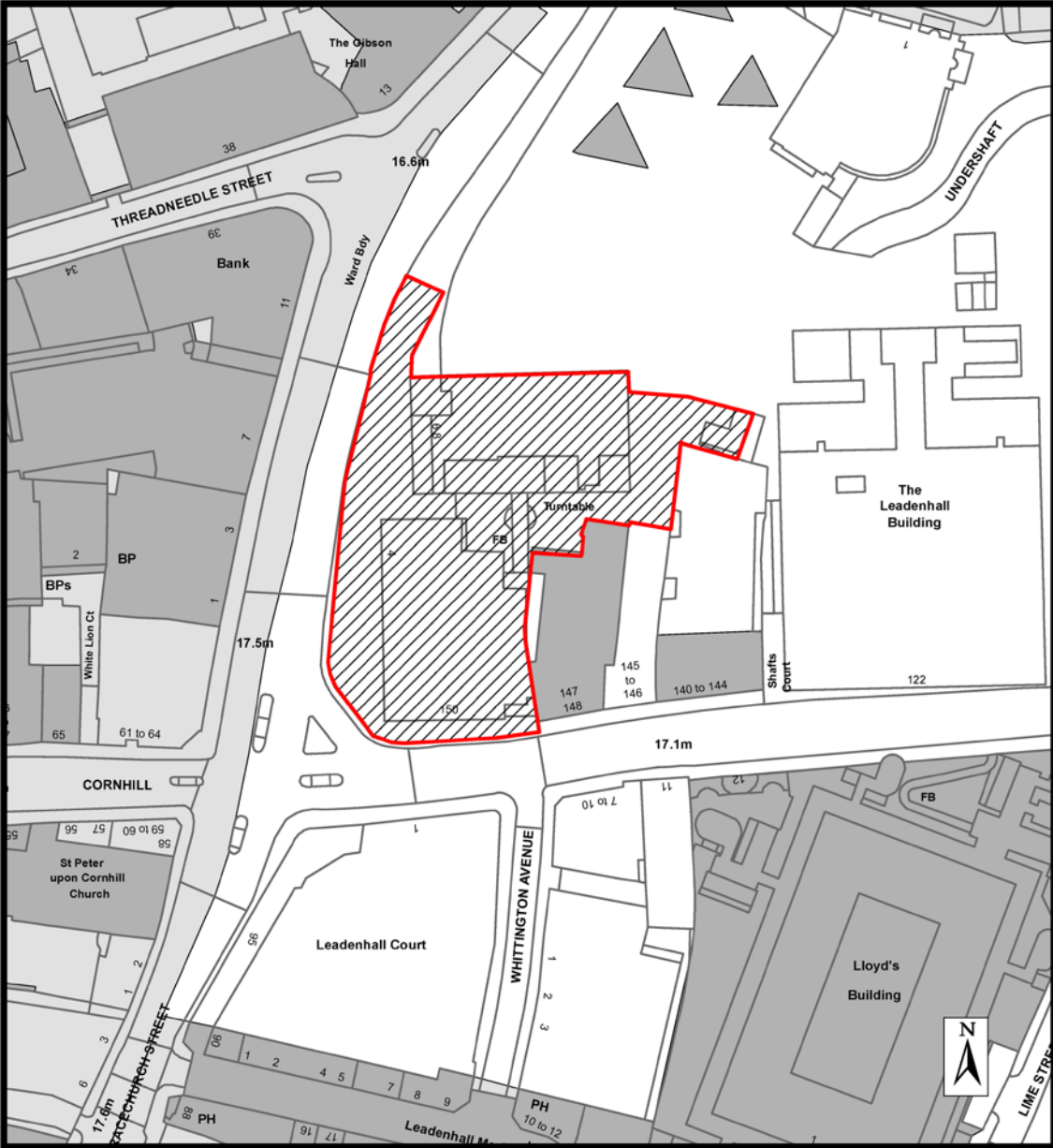
Recommendation

(a) The Mayor of London be given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

(b) Planning permission be GRANTED for the above proposal in accordance with the details set out in the attached schedule subject to planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed;

(c) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.



Site Location Plan



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ADDRESS:
6-8 Bishopsgate & 150 Leadenhall Street

CASE No.
17/00447/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



1. View north from Gracechurch Street

6-8 Bishopsgate & 150 Leadenhall Street



2. View north east from the junction of Gracechurch Street and Cornhill



3. View south from the junction of Bishopsgate and Threadneedle Street

6-8 Bishopsgate & 150 Leadenhall Street

Main Report

Environmental Impact Assessment

1. This application is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them, are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from member of the public about environmental issues.
3. The Environmental Statement must include at least:
 - A description of the development comprising information on the site, design and size of the development;
 - A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects;
 - The data required to identify and assess the main effects which the development is likely to have on the environment;
 - An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects;
 - A non-technical summary of the information provided; and
 - Any other information necessary to consider the environmental effects of the proposal.

Site

4. The Site occupies the corner of Bishopsgate and Leadenhall Street and is comprised of two separate buildings, 6-8 Bishopsgate and 150 Leadenhall Street. The buildings are neither listed nor within a conservation area.
5. The existing building at 6-8 Bishopsgate is an office building arranged over lower ground, ground, 2 podium level floors and 20 upper floors. The building at 150 Leadenhall Street is also in office use, comprising ground plus 6 upper floors.
6. The Site forms part of the City's Eastern Cluster of tall buildings and to the north of the proposal site is the development site of 22 Bishopsgate with 122 Leadenhall Street (The Leadenhall Building) to the east.
7. The highway authority for Bishopsgate is Transport for London (TfL).

Relevant Planning History

8. The principle of redevelopment of this site to provide a tall building with a slightly increased footprint was established when planning permission (15/00443/FULEIA) for the demolition of the existing buildings and

redevelopment to provide a new building comprising lower ground and basement levels (including part basement mezzanine), ground and mezzanine levels plus part 8, part 20 and part 40 storeys plus plant [185.1m AOD] to provide office (Class B1) use [70,053sq.m GEA], flexible shop/cafe and restaurant (Class A1/ A3) uses [418sq.m GEA] at part ground floor and mezzanine levels and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [235sq.m GEA] at part ground floor and mezzanine levels; and a publicly accessible roof top pavilion (sui generis) [795sq.m GEA] at level 40 together with the provision of hard and soft landscaping [TOTAL 71,501sq.m GEA] was presented to, and approved by, your Committee on 31st July 2015. Following completion of the legal agreements, a Decision Notice was issued on 17th December 2015.

Proposal

9. It is proposed to demolish the existing buildings and construct a new building for office, retail and public use. The building would comprise lower ground level, three basement levels, ground floor plus part 10, 25 and 51 storeys including plant. The highest part of the building would be 221.3m AOD (203.8m AGL).
10. The proposed floorspace of the building is 87,355sq.m of which 85,892sq.m would be office (Class B1), 445sq.m retail (Class A1 or A3) and 199sq.m of retail/office (Class A1, A3 or B1). There would be a publicly accessible roof top pavilion (sui generis) of 819sq.m at level 50. [All floorspace figures GEA]
11. The pavilion at level 50 would be a mixed (sui generis) use comprising a public viewing gallery and tenant meeting rooms. The two areas would be subdivided by sliding partitions that would enable the whole space to be opened up for private functions outside of public access hours.
12. The viewing gallery would be served by a separate entrance lobby and lifts that would be accessed from Bishopsgate. It would be open, free of charge, to a maximum of 50 members of the public at any one time during visiting hours.
13. The principal office entrance and reception would be located on Bishopsgate with a secondary entrance from Leadenhall Street. The retail unit(s) would be sited on the junction of Bishopsgate and Leadenhall Street. Servicing would be at lower ground floor level with access from Undershaft.

Consultations

14. The views of other City of London departments have been taken into account in considering the redevelopment scheme. Some detailed matters remain to be dealt with through conditions and the provision of an agreement under Section 106 of the Town and Country Planning Act 1990.

15. Historic England noted that the revised design would now appear “very slightly outside the leaning profile of No. 122 Leadenhall Street in the view from Fleet Street towards St. Paul’s Cathedral.” However, they accepted that the proposals would have little impact on the setting of the Cathedral and raised no objection.
16. Historic Royal Palaces have not responded.
17. Thames Water has no objections but asks for conditions to be imposed to prevent foundations having an adverse impact on water resources and sewers as well as ensuring that the development does not impact on water supplies.
18. The Environment Agency considers the proposals to be low risk.
19. Natural England has no objection.
20. London City Airport had no safeguarding objections but requested the imposition of a condition in relation to crane and scaffolding operation methodologies.
21. The Greater London Authority (GLA) has confirmed that the proposed development generally complies with the London Plan but has asked that the applicant ensure the short fall in carbon dioxide reductions is met off-site.

In relation to their role as highway authority for Bishopsgate, Transport for London (TfL) have requested additional information in respect of trip generation, transport capacity, highway works, a delivery and servicing plan and a construction management plan.

These issues are to be dealt with through condition, as part of the provisions of the Undertakings under Section 106 of the Town and Country Planning Act 1990 or as part of a Section 278 agreement.

Should your committee be minded to grant planning permission, the application will be referred back to the Mayor under Article 5 of the Town & Country Planning (Mayor of London) Order 2008. The Mayor will then have fourteen days to decide whether to allow the City to issue the decision

22. The churches of St. Peter-upon-Cornhill, St. Helen Bishopsgate and St. Andrew's Undershaft have not commented in respect of this application.
23. The Surveyor to the Fabric of St Paul’s Cathedral has not responded.
24. The City of Westminster raised no objection.
25. The London Borough of Tower Hamlets disagreed with the conclusions expressed in the submitted Townscape and Visual Impact Assessment and the Heritage Assessment. These issues are addressed within this report.
26. The owners of 122 Leadenhall Street (The Leadenhall Building) have raised concerns that the increased bulk and height of the proposed building would negatively impact on the amenity of their occupiers;

particularly that of the most high-profile occupiers on the upper floors of the building.

This is a private view from an area that is not publicly accessible. There is no right to, or protection off, such views.

27. An objection to the proposals was received from a residential occupier on St. Michael's Alley (off Cornhill):

"I object to this development on the grounds of further densification in this already overdeveloped location. It will also affect our property with regard to casting of shadows/light and impacting our view."

It is noted that the proposed development would be to the north-east of the residential property and, due to the relative orientation, could not impact on its sunlight other than in the early morning during the summer months when the sun is to the north of due east. However, during those morning hours the proposed building would sit within the shadow of the existing taller development at 122 Leadenhall Street.

Due to the relative orientation and distance between the properties (approximately 133m measured between the nearest points) there would be no measurable impact on daylight.

Policy Context

28. The development plan consists of the London Plan and the Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
29. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

Introduction

30. The Corporation, in determining the planning application has the following main statutory duties to perform:

To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);

To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);

For development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990) and;

For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

31. Paragraph 131 of the NPPF advises, “In determining planning applications, local planning authorities should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.”
32. The NPPF states at paragraph 14 that “at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking For decision-taking this means: approving development proposals that accord with the development plan without delay...” It further states at Paragraph 2 that:

“Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
33. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
34. In considering the planning application before you, account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
35. The Environmental Statement is available in the Members’ Room, along with the application, drawings and the representations received in respect of the application.
36. The principal issues in considering this application are:
 - The extent to which the proposals comply with Government policy advice (NPPF).
 - The extent to which the proposals comply with the relevant policies of the London Plan and the Local Plan.
 - The impact of the proposal on heritage assets.
 - The impact on the nearby buildings and spaces, including daylight/sunlight and amenity.

Economic Issues and the Need for Development

37. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London’s status as a ‘World City’. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial

centre, alongside New York. The City is a leading driver of the London and national economies, generating £45 billion in economic output (as measured by Gross Value Added), equivalent to 13% of London's output and 3% of total UK output. The City is a significant and growing centre of employment, providing employment for over 450,000 people.

38. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can still provide a significant competitive advantage.
39. The National Planning Policy Framework establishes a presumption in favour of sustainable development and places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
40. The City of London lies within the Central Activities Zone (CAZ), which is London's geographic, economic and administrative core and contains London's largest concentration of financial and business services. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
41. The London Plan projects future employment growth across London, projecting an increase in City employment of 151,000 between 2011 and 2036, a growth of 35.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
42. Strategic Objective 1 in the City of London Local Plan is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. Local Plan Policy DM1.2 encourages the provision of large office schemes. The Local Plan also recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity, particularly in the Eastern Cluster, identifying this area as the main focus for future office development and new tall buildings. Strategic Objective 2 and Policy CS7 actively promote a significant increase in office floorspace within the Eastern Cluster, providing for high quality floorspace to meet the varied needs of office occupiers and attract new inward investment into the City.

43. The provision of a substantial and tall office building in this location, as has been established by the extant planning permission for the site, meets the aims of policy CS7 in delivering a significant growth in both office floorspace and employment. The current application provides for an additional increase in floorspace and employment in line with the requirements of the Local Plan.
44. The proposed development would result in an additional 52,718sq.m gross of B1 office floorspace over the existing buildings and 15,776sq.m more than the extant permission, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and deliver approximately 4.6% of the additional office floorspace sought in Local Plan policy CS1.
45. Using the London Plan's assumed density of one person per 12sq.m Net Internal Area (NIA) the number of office workers in the new building could be 4,426 compared to 3,572 in the case of the extant permission and 1,580 in the existing buildings.
46. The proposed development includes large uniform floor plates maximising internal usable areas and addressing the needs of international business in accordance with Local Plan policy DM1.2 and provide flexible floor space for a variety of occupiers.

Viewing Gallery

47. The upper pavilion at Levels 48 to 51 would comprise plant rooms (levels 48, 49 and 51) and a viewing gallery (sui generis) with tenant meeting rooms (Class B1) at level 50.
48. The development would not be permitted to be occupied until the; (a) Viewing Gallery (b) entrance lobby (c) public access lifts have been completed and (d) a viewing gallery management plan has been approved by the City of London. These requirements will form part of the S.106 agreement.
49. The viewing gallery management plan would make provision for, but would not be limited to, such matters as booking procedures, safety and security, management, staffing and access.
50. The provision of a publicly accessible viewing gallery would be in accordance with policy 7.7 of the London Plan and policy DM10.3 of the Local Plan and would provide a substantial public benefit.
51. The viewing gallery would be accessible by the public free of charge, during opening hours and would accommodate 50 members of the public at any one time. The viewing gallery would be accessed from Bishopsgate with its own entrance and lobby at ground floor comprising reception and security, two dedicated shuttle lifts. It would be sufficiently large to avoid any queuing on the street.
52. Access to the viewing gallery would be via a booking system on a dedicated website and visitors would be able to book to access the

viewing gallery prior to arrival. During public opening hours, no office tenants would be able to access the Viewing Gallery from the tenant meeting rooms at Level 50. Office tenants would need to book via the dedicated website and access the viewing gallery from the ground floor entrance lobby, in the same way as all visitors.

53. The proposed public opening hours are as agreed as part of the previously approved scheme:

Mondays and Fridays	12pm – 9pm
Tuesdays to Thursday	10:30am – 5:30pm
Saturdays	11am – 6pm
Sundays and Bank Holidays	10am – 5pm

54. The viewing gallery would be closed to members of the public on Christmas Day, Boxing Day, New Year's Day and Easter Sunday.

Retail Uses

55. The existing buildings contain no retail floorspace.
56. The new development would provide 445sq.m (GEA) retail floorspace in a single flexible unit (Class A1 and A3) at ground and mezzanine levels.
57. A further 199sq.m (GEA) of retail space could potentially be provided at ground floor and mezzanine levels in a flexible unit with uses including retail (Class A1 and A3) and office (Class B1). If occupied as a retail unit the total retail floorspace provided within the site would be 644sq.m (GEA).
58. The site is not in a designated Principal Shopping Centre (PSC) as defined in policy DM 20.1 and new retail is encouraged to be located within these areas. However, Policy DM 20.3 supports retail outside of the PSCs where it would help form an active frontage, provide amenity to City workers and enhance vibrancy. New retail units in this development would benefit the increased numbers visiting and working in this area, providing additional retail frontage on both Bishopsgate and Leadenhall Street, complementing the nearby Leadenhall Market PSC.
59. To ensure that there is sufficient room for pedestrians to pass, it will be a requirement that there will be no use of the adjoining highway by the retail units for seating or standing. This will form part of the section 106 agreement.

Bulk, Height & Massing

60. The proposed development lies within the Eastern Cluster Core Strategy policy area which is an area where tall buildings are considered to be appropriate subject to certain criteria being met.
61. The development would comprise two linked elements with a contiguous single floor plate; a tower of 3 basement levels, ground, mezzanine and 50 upper storeys on the northern part of the site and a

lower masonry street block of 3 basement levels, ground, mezzanine and nine upper storeys on the southern corner.

62. The site is on a prominent corner of Bishopsgate and Leadenhall Street between the under construction development at 22 Bishopsgate scheme to the north and the Leadenhall Building to the east.
63. Rising to a height of approximately 221.3m (AOD) including plant, the proposed building would be 36m taller than the previously approved scheme. In addition the shoulder heights of the various “stacked block” elements increase from the permitted scheme. The corner masonry block increases from 55m to 58m, the second block rises from 100m to 116m, the third (penultimate) block rises from 173m to 201m whilst the uppermost block increases in height from 184m to 220m. [All measurements AOD]
64. The proposed building would relate satisfactorily to the heights and profile of the tall building cluster: existing, under construction and approved. In this respect the increase in height from the permitted scheme would result in a more convincing transition between the height of the permitted building at 1 Leadenhall Street (182.7m AOD) to the south and 22 Bishopsgate (294.94m AOD) to the north as well as a more coherent hierarchy and profile to the cluster of tall buildings when seen from the west.
65. The following list outlines the heights of the existing and permitted tall buildings in the city cluster (descending AOD height order):
 - 1 Undershaft - 304.9m
 - 22 Bishopsgate - 294.94m
 - 122 Leadenhall Street - 239.4m
 - Heron Tower - 217.8m
 - 52-54 Lime Street - 206.5m
 - Tower 42 - 199.6m
 - 30 St Mary Axe - 195m
 - 100 Bishopsgate - 184m
 - 1 Leadenhall Street - 182.7m
 - 40 Leadenhall Street - 170m
 - 150 Bishopsgate - 151m
 - 51 Lime Street - 138m
 - 99 Bishopsgate - 118m
66. The view from Ludgate Hill of St Paul’s Cathedral against a clear sky gap is of significance and is recognised as one of the key views of St. Paul’s. This view and 122 Leadenhall Street (the Leadenhall Building) are key elements in informing the height and massing of the proposed

building. In this respect it was considered important that the breathing space of open sky be retained to the north of the Cathedral as well as retaining the differentially quality of 122 Leadenhall Street angling away from the Cathedral.

67. The proposed scheme would, to a minimal degree, breach the angled slope of the Leadenhall building in views along Fleet Street. The encroachment into the open area of sky has been negotiated so that it is not considered significant and would not be readily perceptible from public viewpoints along Fleet Street and Ludgate Hill. In this respect, the principal characteristic of this view, the generous area of sky with the tall buildings angling away from St Paul's, would essentially remain.
68. The increase in the envelope of the proposed building would diminish the wedge shaped profile of 122 Leadenhall Street in views along Ludgate Hill. However, the impact is not considered harmful and the sloping profile of the Leadenhall Building will remain discernible in these views.
69. An additional factor in relation to the view from Ludgate Hill to St Paul's Cathedral was the need to ensure that the lower corner building would not significantly encroach on the open area of sky around the Cathedral but would address the need for it to read as a coherent, robust, bookend visually supporting the street block to the east of 140-148 Leadenhall Street. Consequently, the corner building rises to 11 storeys (ground, mezzanine and 9 upper storeys) and is a predominantly masonry building which is considered to be of an appropriate height in relation to the adjoining buildings and the view from Fleet Street and Ludgate Hill.

Design

70. The design reflects the permitted scheme's design approach of "stacked blocks", albeit taller and with subtle design refinements. The scheme consists of a series of stacked and interlocking blocks diminishing in size on the upper storeys. It has a bold and dynamic form with the individual blocks on a slightly different alignment and cantilevered over the lower block. The building is crowned by a rectilinear block which slightly overhangs the lower block and incorporates the public viewing gallery. This distinctive character establishes the individuality of the building in relation to the designs of the other tall buildings in the cluster while responding to their height and form. In this respect, the design approach complements the vibrant quality of the cluster of tall buildings as a family of individuals with contrasting characteristics but with a refined dialogue between them.
71. The proposed design is an enhancement over the permitted scheme as there is a stronger vertical emphasis and the overall increase in cantilevering (especially in the case of the corner block) results in a more dynamic and eye catching appearance. In addition the uppermost block's more assertive proportions results in a stronger visual termination to the building.

72. To reinforce the individual identity of the stacked blocks there would be a subtle contrast in cladding details through variations in the glazing modules and the addition of aluminium fins. The cantilevered nature of the blocks will appear particularly dynamic and convincing looking upwards from street level views in the vicinity of the building on Bishopsgate.
73. Although of modest floorspace and size, the cantilevered nature and full height glazing of the publically accessible viewing gallery would afford spectacular views to the west, north-west and south. It would provide a vantage point at some 210m high which would likely prove popular with members of the public and compliment that at 22 Bishopsgate at 251m to 264m high.
74. The ground floor retail facades are predominantly glazed ensuring appropriately active and vibrant frontages that would help enhance the public realm at this point.
75. The design of the corner building as a stone clad, masonry facade with punched, deeply recessed, openings relates satisfactorily to the fine collection of masonry facades to the east (including listed buildings). In this respect, the corner building assists in defining a coherent street block of masonry buildings which contrast appropriately with the neighbouring backdrop of tall buildings. The modelling and detailing of this block, especially in the key oblique views is convincing and appropriate. The frameless glazed upper storeys of the corner building would be stepped back from the main masonry facades and would appear recessive and subservient and an appropriate visual termination to the building. The proportions of the proposed building with a strong base, middle and top is convincing.
76. The building maintenance regime would be discreet with cleaning cradles and guide rails located on the flat roofs and roof terraces. The cradle parking positions would ensure that they would be concealed from street level views.
77. The landscaping approach with the introduction of greening to the roof terraces is considered appropriate.

London Views Management Framework and Tower of London Local Setting Study

78. The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. The LVMF provides Mayoral Supplementary Planning Guidance (SPG) on the management of 27 strategically important views designated in the London Plan. It elaborates on the policy approach set out in London Plan policies 7.10, 7.11 and 7.12 and came into effect on 16 March 2012. London Plan policy requires that development should not cause adverse impacts on World Heritage Sites or their settings and that new development should not harm and where possible should make a

positive contribution to the characteristics and composition of strategic views and their landmark elements.

79. The site falls outside all of the Protected Vistas of the London Views Management Framework. However, the building would impact in a significant manner on a number of Assessment points in the LVMF.

Tower Bridge: (10A.1)

80. This LVMF view is also identified as a key view in the Tower of London World Heritage site Local setting Study. Its focus is on the Tower of London with the cluster of tall buildings in the City a distinctive element to the west of the Tower.
81. In this view, the proposed building would be visible as an element on the skyline near the centre of the cluster between 1 Leadenhall Street and 122 Leadenhall Street (the Leadenhall Building) and in front of 22 Bishopsgate. It would assist in mediating between the height differences of both buildings thereby pulling the cluster together as a coherent single urban form. The proposed building is not considered to harm this view. The contrast between the undoubted historical significance of the Tower of London and the emerging new City skyline to its west is considered to encapsulate the dynamics of the City where the old and new co-exist convincingly.
82. The proposed building would be a significant distance away from the White Tower which is on the eastern side of this view and would remain the dominant focal point in the foreground of the view with the City's cluster of tall buildings as a backdrop. The proposal would not compromise views, or the setting, of the Tower of London World Heritage Site or its Outstanding Universal Value.
83. The proposal would not dominate the Tower of London or compromise the ability to appreciate the Outstanding Universal Value of the World Heritage Site. It would relate satisfactorily to the existing skyline features and consolidate the City cluster of tall buildings. Therefore, the proposal is in accordance with the guidance for this view (paragraphs 183 to 187 of the LVMF).

City Hall (25A.1, 25A.2, 25A.3)

84. While outside the Protected Vista, the proposal would affect the views from, and between, the three Assessment Points (25A.1, 25A.2 and 25A.3). The City cluster of tall buildings is a characteristic element in these views and contributes to the evolving quality of the view. The site falls outside the Protected Vista from City Hall focusing on the Tower of London. However, the proposal would affect the views from the three assessment points.
85. The principal focus of all three views is the strategic landmark of the Tower of London on the eastern side of the view. The proposed building would appear feature on the skyline of the cluster of tall buildings and would provide a transition in scale between 1 Leadenhall Street and 22 Bishopsgate and would reinforce and consolidate the profile of the cluster. This is an appropriate and sympathetic

relationship to the Tower of London. At no point in the three Assessment Viewpoints would the proposed building appear directly over the Tower of London. The Tower of London to the east of the cluster would continue to dominate the lower scale of the townscape in this critical part of the view. The Outstanding Universal Value and setting of the Tower of London World Heritage Site would not be compromised.

86. The proposal is considered to be in accordance with the guidance for this view (paras 414 to 415 and 418 to 419 of the LVMF) and Policy 7.10B of the London Plan. In particular, by virtue of the proposed building's height, scale, massing, materials and the quality of design and, its relationship to the other buildings in this view. The proposed building would not compromise the viewer's ability to appreciate the Outstanding Universal Value, integrity, authenticity or significance of the World Heritage Site. Consequently, the World Heritage Site would continue to dominate its surroundings.

Waterloo Bridge (15B.1 and 15B.2)

87. The proposed building would appear in the foreground of the cluster in these viewpoints. It would be located between 22 Bishopsgate and 1 Leadenhall Street with 122 Leadenhall Street (the Leadenhall Building) in the background. It would consolidate and enhance the dynamic profile of the city cluster of tall buildings by pulling the tall buildings together visually, creating a more coherent urban form.
88. It would not encroach upon the area of sky to the north between the cluster and St. Paul's Cathedral. The viewer's ability to recognize and appreciate St. Paul's Cathedral as a Strategically Important Landmark would not be diminished.
89. The proposal is considered to be in accordance with the guidance for this view (para 262 to 267 of the LVMF). In particular, the proposal would assist in consolidating the cluster into a unified urban form on the skyline behind the buildings and spaces fronting the river, thereby contributing positively to their setting. Due to its height and architectural design, the proposed building would complement the City's Eastern cluster of tall buildings and would not visually draw the cluster closer to St Paul's Cathedral; ensuring the Cathedral's continued visual prominence.

Hungerford Bridge (17B.1, 17B.2)

90. The impact on the views eastwards from Hungerford Bridge would be very similar to that from Waterloo Bridge as both bridges are roughly parallel. The proposed building would appear between 22 Bishopsgate and 1 Leadenhall Street and would consolidate the cluster's profile. It would not harm the appreciation, views or setting of St. Paul's Cathedral.
91. The proposal is considered to be in accordance with the guidance for this view (paras 301 to 305 of the LVMF). In particular, the setting of St. Paul's Cathedral would be preserved while the building would help

strengthen the composition of the existing cluster of tall buildings with its high quality design.

London Bridge (11B.1, 11B.2)

92. The building would be visible on the western periphery of this view from, and between, Assessment Points 11B.1 and 11B.2. The upper levels of the building would be seen on the skyline above 1 Leadenhall Street and 22 Bishopsgate and would not harm the setting of the Tower of London World Heritage Site which is to the extreme east of this view. The proposal would consolidate the profile of the cluster, creating a transition in scale between 1 Leadenhall Street and 22 Bishopsgate and would not harm the setting of the listed Adelaide House, Custom House, St Magnus the Martyr or Billingsgate Market.
93. The proposal is considered to be in accordance with the guidance for this view (paras 202 to 205 of the LVMF). In particular, Tower Bridge would remain the dominant structure in this view and the viewer's ability to easily recognize its profile and the Outstanding Universal Value of the World Heritage Site would not be compromised.

Gabriel's Wharf (16B.1, 16B.2)

94. From, and between, Assessment points 16B.1 and 16B.2 the proposed building would appear in the foreground of the City's cluster of tall buildings between 22 Bishopsgate and the 122 Leadenhall Street. In this respect it would assist in consolidating the profile of the cluster as a coherent urban form and clarifying the cluster's relationship with St. Paul's cathedral. The views and setting of St Paul's Cathedral or other Heritage Assets in this view would not be harmed.
95. The proposal is considered to be in accordance with the guidance for this view (paras 280 to 283 of the LVMF). In particular, the proposed building would preserve the townscape setting of St. Paul's Cathedral by being located within, and contributing to, the existing eastern cluster. The prominence of St Paul's Cathedral would not be reduced or compromised.

St James' Park (26A)

96. The proposed building would be concealed by the mature tree canopy on Duck Island. In this respect, the proposal would not harm this view.
97. The proposal is in accordance with the guidance for this view (para 431 of the LVMF). In particular, the proposal is of a scale, mass or form that does not dominate, overpower or compete with either of the existing two groups of built form or the landscape elements between and either side of them.

**Alexandra Palace (1A.1, 1A.2), Parliament Hill (2A.1, 2A.2)
Kenwood (3A), Primrose (4A)**

98. In each of these views the proposed building would be located well to the left of the protected vista of St. Paul's Cathedral and would not diminish the appreciation or the setting of the Cathedral and, would not

diminish the viewer's ability to recognize or appreciate the Cathedral. The building would consolidate the existing cluster of tall buildings.

99. In this respect, the proposal is in accordance with the LVMF guidance for these views (para 87 to 90 in the case of 1A.1 and 1A.2; para 98 to 103 in the case of 2A.1 and 2A.2; para 119 to 121 in the case of 3A and para 130 in the case of 4A.1).

Greenwich (5A.1, 5A.2), Blackheath (6A)

100. In these views the proposed building would be located well to the right of St. Paul's Cathedral and would not diminish the viewer's ability to recognize or appreciate the Cathedral. The building would consolidate the existing cluster of tall buildings.
101. In this respect the proposal is in accordance with the guidance for these views (para 143 to 147 in the case of 5A.1 and 5A.2 and paras 154 to 156 in the case of 6A).

Other Key Views (non LVMF)

102. Given the scale of the proposed building, its impact on surrounding townscape views is substantial and the key views impacted upon are discussed in turn.

Monument

103. The proposal falls outside the identified viewing cones from the Monument and would not harm or conceal views of important heritage assets in the view. The proposal would be largely concealed behind 1 Leadenhall Street and, where visible, would assist in consolidating the cluster of tall buildings as well as contributing to a visual interplay between the viewing gallery of the Monument and the viewing gallery at the top of the proposed building. The proposal would not harm or obstruct important distant or local views of the Monument.

Fleet Street / Ludgate Hill

104. The impact on this view has been discussed in preceding paragraphs.

St. Paul's Cathedral

105. The proposal is not within the St. Paul's Heights policy area and, as outlined in preceding paragraphs, would not harm views or the setting of St. Paul's.
106. Exceptional public views of London are afforded from the Golden gallery of St. Paul's Cathedral. From the gallery viewing area, the proposed building would appear as a prominent element in the foreground on the western side of the cluster of tall buildings, partly obscuring 122 Leadenhall Street. The proposal would not harm views from the Golden gallery or other viewpoints.

Bank junction

107. The proposed building would appear as a prominent backdrop to the Royal Exchange on Bank junction between 22 Bishopsgate and 1 Leadenhall Street and partly concealing 122 Leadenhall Street.

108. The existing backdrop of the Bank of England, Royal Exchange and Mansion House consists of a number of tall buildings from 122 Leadenhall Street, Tower 42 and the former Stock Exchange. Added to these will be the emerging tall buildings of the evolving City Cluster including 22 Bishopsgate and 52-54 Lime Street (under construction), 40 Leadenhall Street (permitted) and 1 Undershaft (resolution to grant). The result will be a dynamic backdrop and a striking contrast between the historical buildings framing Bank junction in the foreground and the backdrop of contemporary tall buildings. The proposed building would consolidate the form and profile of the City cluster in this view.

Bishopsgate and Gracechurch Street

109. In views northwards along Gracechurch Street, the building would be largely concealed behind 1 Leadenhall Street but where visible would provide a dynamic visual termination to this view alongside 22 Bishopsgate.
110. In views southwards along Bishopsgate, the proposal would be almost wholly concealed behind 22 Bishopsgate. In views on the western side of Bishopsgate opposite the site, the cantilevered, stacked block nature of the building would have a dynamic and eye-catching impact.

Other Local Views

111. Given the scale of the proposed building, it would have a considerable impact on other surrounding views both in the City and to a wider area of central London. These have been assessed in detail.
112. In views, such as, from Threadneedle Street, Cornhill, Gresham Street and Queen Victoria Street the proposed building would form a strong and prominent point on the skyline, not only signifying the City cluster of tall buildings as a key part of London's skyline but also playing a key visual role in successfully unifying and consolidating the profile of the city cluster as a coherent urban form.

Views from other publically accessible elevated viewing areas

113. The city cluster forms a key part in a number of elevated views from other buildings which, by reason of the fact they are freely available to the public, have significant public benefits. Such free public elevated viewing areas are increasing in number.
114. The city cluster of tall buildings and other London landmarks are important element in views from these areas. In particular, the cluster of tall buildings forms a dynamic element in views northwards from the Skygarden at 20 Fenchurch Street and the roof terrace of 1 New Change. The impact of the proposal on both of these locations has been assessed and the proposal would contribute positively to the dynamic qualities of the views.
115. The proposal would not harm future views from the roof terrace of 120 Fenchurch Street (under construction) or the viewing gallery in 1 Leadenhall Street (consented) which would be to the south of the proposal site and south facing.

116. The proposed building would have a very minor impact on the views southwards from the viewing gallery at 22 Bishopsgate. However, the highest point of the proposed building would be approximately 30m below the lowest part of the public viewing gallery and, therefore, only the very local views towards Leadenhall Street and Gracechurch Street would be impacted. This is not considered to be significant.
117. The proposal would, to a limited degree, diminish views to the south west from the 1 Undershaft public viewing gallery (resolution to grant). However, this would only involve the infilling of the narrow gap between 22 Bishopsgate and the 122 Leadenhall Street.

The Setting of the Tower of London World Heritage Site

118. The Tower of London World Heritage Site Management Plan (2007) provides an agreed framework for long-term decision-making on the conservation and improvement of the Tower and sustaining its outstanding universal value. The Plan embraces the physical preservation of the Tower, protecting and enhancing the visual and environmental character of its local setting, providing a consideration of its wider setting and improving the understanding and enjoyment of the Tower as a cultural resource. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that provide definition to those spaces. Its boundary is heavily influenced by views across the Thames.
119. As a result of the Management Plan objectives and actions, the Tower of London Local Setting Study was produced in 2010. This study describes the current character and condition of the Tower's local setting and sets out aims and objectives for conserving, promoting and enhancing appreciation of the Outstanding Universal Value of the Tower, that is, the attributes which justify its inscription.
120. The local setting area as defined in the Tower of London World Heritage Site Management Plan is recognized and identified in the City of London Local Plan in Policies CS12 and CS13 and on Policies Map A.
121. The proposed development is located a considerable distance to the west of the Tower and has been assessed from all recognized key views of the World Heritage Site identified in the adopted Local Setting Study. Many of these views from the South Bank (25A) and Tower Bridge (10A) are also LVMF views covered in preceding paragraphs. It is concluded the proposed building would not cause an adverse impact on the World Heritage Site or its setting in these views or compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In this respect the proposal is in accordance with Policy 7.10 of the London Plan.
122. Other views listed within the Local Setting Study include views from the Inner Ward, Inner Wall and near the Byward Tower entrance. These have been assessed in turn.
123. The viewing gallery would allow for new high level public views of the Tower of London, enhancing its visual appreciation.

124. From the identified viewpoint from the Inner Wall looking northwards, the proposed building would mediate between the heights of 1 Leadenhall Street and the taller 22 Bishopsgate. The proposed building would introduce more bulk on the eastern side of the cluster but not in a manner that would harm views out of the World Heritage Site. From this viewpoint, the proposed building would sit comfortably within the emerging City cluster of tall buildings and would consolidate the profile of the cluster as a coherent unified form on the skyline.
125. In the view from the Byward Tower entrance, the proposed building would similarly consolidate the profile of the cluster rising to the left of 122 Leadenhall Street and would introduce greater bulk to the cluster at this point. The proposal would not harm views out of the World Heritage Site from this point.
126. The proposed building would not harm the Outstanding Universal Value or views of, or out of, the Tower of London World Heritage Site and would assist in consolidating the visual profile of the cluster.
127. Although clearly visible, the proposed building would appear as a peripheral feature on the skyline; a considerable distance from the World Heritage Site. The emerging City cluster of tall buildings to the west of the Tower of London is an integral part of the setting and views of the World Heritage Site. The proposal would assist in consolidating this cluster as a coherent, unified urban form and would not harm the setting or Outstanding Universal value of the World Heritage site in any of these views.

The Setting of Listed Buildings

128. A large number of listed buildings are located in close proximity to the site. In addition, by reason of the scale and height of the development it affects the setting of a number of other listed buildings further afield. These are discussed in turn:

St. Helen's Bishopsgate

129. This grade I listed Church lies to the north of the proposed building but 22 Bishopsgate, 122 Leadenhall Street and 1 Undershaft when built would largely conceal the building in views from the Church. Therefore, its visual impact is limited. In this respect the special architectural and historical interest of the Church would not be harmed.

Gibson Hall

130. Gibson Hall (grade I listed) stands opposite the site to the west. The proposed building would appear as a prominent backdrop to this listed building in views along Bishopsgate. The backdrop in these views is characterized by tall buildings, in particular 22 Bishopsgate, 1 Leadenhall Street, 122 Leadenhall Street and Tower 42. In this respect, the proposed building would not harm the setting of this listed building.

St. Ethelburga's Bishopsgate , Nos 46, 48, 52-58, 60-68, 70 Bishopsgate

131. This collection of listed buildings defines the eastern frontage of Bishopsgate to the immediate north of the application site. They also define the western boundary of the St. Helen's Place Conservation Area.
132. The proposed building would generally be concealed from view by 22 Bishopsgate. The setting of these buildings is defined by a backdrop of tall buildings to the north, west, south and east. This stark contrast in scale is now an integral part of the Church's setting and, as such, the proposed building would not harm this setting.

147 and 148 Leadenhall Street

133. These grade II listed buildings are located on the north side of Leadenhall Street adjoining the south east corner of the site. As with many listed buildings in the eastern cluster, the setting of these buildings is characterized by tall buildings, with 122 Leadenhall Street to the immediate east and the Lloyd's Building and 1 Leadenhall Street to the south. The proposed building was designed with a masonry lower corner block to create a contextual response to the listed buildings and a bookend to this masonry terrace. In this respect the proposal responds satisfactorily to the setting of these listed buildings.

Lloyd's Building

134. The Lloyd's Building on the south side of Leadenhall Street to the south east of the proposal site is grade I listed. In most local views, the proposed building would be seen alongside the other tall buildings within the cluster as a backdrop to the Lloyd's building which is an appropriate setting to what is, in its own right a high rise building of national significance.

St. Andrew Undershaft Church

135. This grade I listed church is located to the east of the site on St. Mary Axe. The proposed building would be almost wholly concealed from views affecting St. Andrew Undershaft by the 122 Leadenhall Street. In this respect the proposed building would not harm the setting of the listed Church.

Church of St Peter upon Cornhill

136. This grade I listed church lies to the south west of the site on Gracechurch Street. The proposed building would appear as a prominent backdrop to this listed building in views along Bishopsgate. The backdrop in these views is characterized by tall buildings, in particular 22 Bishopsgate, 1 Leadenhall Street, 122 Leadenhall Street and Tower 42. In this respect, the proposed building would not harm the setting of this listed building.

The Listed Buildings of Bank Junction

137. The historic buildings framing the Bank junction represent one of the most sensitive townscapes in London and are the core of this part of

the City. These buildings include the nationally significant grade I Listed Bank of England, Royal Exchange, Mansion House and St. Mary Woolnoth as well as others such as the grade I Listed 27-32 Poultry and the grade II listed 1 Princes Street, 1-6 King William Street and 82 Lombard Street.

138. In terms of the proposal, the key views of this collection of listed buildings are from the west looking towards the east, focusing on the portico of the Royal Exchange. The key-defining element of this view is the dynamic contrast between the foreground of these historic buildings and the backdrop of the emerging cluster of tall buildings. The contrast between the old and new provides one of the most striking townscapes in London. The proposed building, in the manner in which it mediates between the lower height of 1 Leadenhall Street and the taller 22 Bishopsgate, would consolidate the form and profile of the City cluster in this view.

The Setting of other Listed Buildings

139. There are a number of listed buildings on Cornhill and the northern end of Gracechurch Street where in certain limited number of views the proposed building would appear as a prominent element in their backdrop. However, where these views are of the cluster of tall buildings (both completed and permitted) it is considered that the proposed building would not cause harm to the setting of these listed buildings.
140. St. Magnus the Martyr Church, Custom House, Billingsgate Market and Adelaide House are all important listed buildings which line the riverside from London Bridge eastwards. In the key views of the proposed building from the south bank and from London and Tower bridges all three buildings are seen in the foreground of the river view with the emerging City cluster of tall buildings as their distinctive backdrop. The proposed building would assist in consolidating the cluster on the skyline and would not harm the setting of these listed buildings.

The Setting of Conservation Areas

141. The site is adjacent or in close proximity to a number of conservation areas. The effect of the proposal on other, more distant conservation areas within and outside the City has been assessed and it is considered the proposal would not harm views or the setting of these. The impact of the proposal on the nearby conservation areas within the City is set out below:

Leadenhall Market

142. To the south of the site is the Leadenhall Market Conservation Area. The proposed building would appear as a striking visual termination of views northwards along Whittington Avenue. Leadenhall Market is characterized by the presence of tall buildings as a backdrop to the north and east and in this respect the proposal would not harm views into or the setting of the conservation area.

143. Given the alignment and roof of the Market, the development would barely be visible in glimpses from within the Market itself and where it would be seen it would be against the backdrop of permitted tall buildings. In this respect, views out of or the setting of the Leadenhall Market Conservation Area would not be harmed.

Bank

144. To the west, the Bank Conservation Area includes all of the west side of Bishopsgate from Gibson's Hall to 8 Gracechurch Street. Views of and from within this Conservation Area is characterized by the backdrop of tall buildings in the City cluster on the north and east side of Bishopsgate. The view from Bank junction, the center piece of the conservation area is discussed in more detail in preceding paragraphs. The proposed building would be visible in a number of viewpoints. However, as stated above, they would be seen against the backdrop of the completed and permitted tall buildings and therefore they would not harm the setting of the Bank Conservation Area.

St. Helen's Place

145. To the north of the site lies the St. Helen's Place Conservation Area. The proposed building would have a limited impact on views within or of the Conservation Area. The proposed building would be almost wholly concealed by the 22 Bishopsgate in these views. In addition, tall buildings are now a characteristic feature in the conservation area's setting. In this context, the proposed building would not harm the character and appearance of the conservation area.

Bishopsgate

146. This Conservation Area lies a significant distance to the north of the site. The building would be almost wholly concealed from views within the Conservation Area by the 22 Bishopsgate Tower. In this respect the proposed building would not harm the character and appearance of the Conservation Area.

Non-designated Heritage Assets

147. No harm has been identified to non-designated Heritage Assets, their settings or their significance.

Waste Management

148. A centralised waste storage area with a minimum headroom clearance of 5m would be located at lower ground level. Access would be from Undershaft.
149. The waste storage and collection facilities have been agreed with the Community Facilities Manager.

Servicing

150. A total of six servicing bays are proposed at the lower ground level, accessed from Undershaft, consisting of three 6-metre bays, two 8-metre bays and one 14-metre bay. The 14-metre bay is designed to accommodate a 10cu.m refuse compactor plus a refuse collection

vehicle. It is proposed that one of the 6-metre bays be usually reserved for facilities management vehicles, e.g., lift engineers', electricians', plumbers' etc., which is best practice. This bay has, therefore, been excluded from consideration of the adequacy of the servicing facilities proposed.

151. Estimated weekday servicing traffic is 168 deliveries per day; your officers consider that this is not unrealistic, but have adopted a more conservative estimate of 191 deliveries per day to ensure a robust assessment. To reduce this level of servicing traffic your officers have asked the applicant to propose consolidation as part of their operation of the building. Consolidation systems have been agreed through section 106 planning obligations for other major developments in the area, including 22 Bishopsgate, 1 Undershaft and 1 Leadenhall Street. The applicant has not committed to run a consolidation centre, but has not ruled out doing so as part of the more detailed planning of the operation of the building. The applicant has, however, proposed two restrictions to ensure that servicing traffic, and the impacts of servicing traffic are minimized:

- A restriction on the total number of deliveries to 84 per day (i.e. 50% of their estimate of unrestricted deliveries of 168 deliveries per day).
- A restriction on accepting deliveries on Mondays to Fridays (other than public and bank holidays) between 7:00 am and 10:00am and between 12:00pm and 2:00pm and between 4:00pm and 7:00pm i.e. the servicing bays would only be in use between the hours 10:00am to 12:00pm and 2:00pm and 4:00pm and 7:00pm and 7:00am.

These restrictions would be secured through provisions within the section 106 agreement.

152. These delivery prohibition periods allow for 16 hours per day of servicing (or 24 hours on Saturdays, Sundays, public holidays and bank holidays).

153. If the 84 permitted daily deliveries are evenly spaced over those permitted 16 hours the proposed 5 servicing bays (plus 1 facilities management bay) would be adequate. To ensure that this regular spacing of deliveries would take place a booking system would need to be instituted and enforced, with non-booked delivery vehicles turned away. This would be secured through a provision within the section 106 agreement.

154. The proposed servicing arrangements would not compromise any future on-street management arrangements for Undershaft, as it would continue to be the point of access for a number of buildings.

Car Parking

155. The development provides no car or motorcycle parking except for one on-site parking space which would be provided for those persons with disabilities.

Public Transport

156. The site is located in an area with a Public Transport Accessibility Level (PTAL) rating of 6b. This is the highest level of accessibility and rated as “Excellent”. It is considered that the proposed development, which would potentially accommodate an additional 854 office workers in comparison to the extant permission, would not generate any additional significant impacts on the public transport network.

Bicycle Spaces

157. A total of 961 cycle parking spaces are proposed at the lower ground level which would be accessed via the service area on Undershaft. For a building of this size, excluding the viewing gallery for which there are no standards, and combination of uses the London Plan’s minimum requirement is for 960 long-stay cycle parking spaces and 43 short-stay cycle parking spaces. As a result, the minimum long-stay cycle parking requirement would be met, but the short-stay requirement would not. There is existing public cycle parking available on Bishopsgate, just north of the junction with Leadenhall Street that would meet some of the short-stay cycle parking need.
158. There is very little street level curtilage available around the site on which additional visitor cycle parking could be provided and there is a need for that unbuilt space to be used to facilitate pedestrian circulation. Therefore, the lack of short-stay cycle parking provision is considered to be acceptable in this particular case.
159. Of the 961 long-stay cycle parking spaces, it is proposed that 865 spaces are provided as cycle parking stands (90%) and 96 as folding bicycle lockers (10%). This proportion of folding bicycle lockers is considered to be acceptable as it reflects existing levels of folding bicycle use in the City.
160. A total of 961 lockers and 96 showers (1:10 cycle spaces) are proposed. This is considered to be an appropriate level of provision.
161. The GLA/TfL accepts that the applicant has, within the constraints of the site, provided an acceptable number and mix of cycle parking. They acknowledge there is no room in the public realm for further short-stay cycle parking provision.

Pedestrian movement

162. The proposed development will generate an estimated 15,040 pedestrian trips per day (inward and outward commuting plus business and personal trips). This compares to 12,377 pedestrian trips from the permitted development and represents a 21.5% increase in estimated trips over the permitted scheme.
163. The predicted baseline scenario for the footways around the site (taking into account the existing baseline flows, the permitted development and the permitted developments at 22 Bishopsgate and 1 Leadenhall Street) indicates that there are several points on Bishopsgate and on Leadenhall Street where pedestrian comfort levels will fall below the recommended minimum comfort level of B+, with

several points on Bishopsgate where the pedestrian comfort levels will fall significantly below that level. Two points on Bishopsgate are likely to fall to level D, described as an environment where “walking speeds are restricted and reduced and there are difficulties in bypassing slower pedestrians or moving in reverse flows”, and one point on Bishopsgate, at the northern site boundary, is likely to fall to level E, which is the lowest level and described as “people have little personal space and speed and movement is very restricted. Extreme difficulties are experienced if moving in reverse flows”. This indicates that the Eastern City Cluster will require the City of London and Transport for London and relevant landowners and other parties to work together to ensure that these adverse impacts of the otherwise desirable growth in the Eastern City Cluster are addressed.

164. The proposed development increases the likely crowding along Bishopsgate and Leadenhall Street compared to the permitted development, but only at three points does this result in a change of pedestrian comfort level, with two points along Bishopsgate falling from level C+ to level C in both the 8:00am–9:00am and 5:00pm–6:00pm peak hours and one point on Bishopsgate falling from level C– to level D in the 8:00am–9:00am peak hour. The single worst point remains Bishopsgate at the northern site boundary, which would remain at level E. The predicted number of pedestrians using the 6.5 m effective width of the footway at this point during the 5:00pm–6:00pm peak hour increases from 7,001 pedestrians in the permitted development to 7,309 pedestrians in the proposed development (a 4.4% increase). This is a flow equivalent to 18.7 pedestrians per metre of useable footway width per minute and compares to the desirable maximum of 13 pedestrians per metre per minute.
165. There is potential for increased pedestrian levels to exacerbate crowding at the junction of Bishopsgate, Leadenhall Street, Gracechurch Street and Cornhill and, therefore, mitigation measures would be required to reduce the likelihood of more dangerous informal crossing and crowding to more normal pedestrian comfort levels. These mitigation measures could range from alterations to traffic signal phasing to installing diagonal crossings and would be the subject of a S.278 agreement between the developer and the local highway authority which in this case would be TfL.
166. As part of the previously approved scheme it was agreed with TfL to remove the left hand filter lane from Bishopsgate to Leadenhall Street and reconfigure the junction of Leadenhall Street and Bishopsgate. This is again proposed and would increase the useable public footway by 103sq.m.
167. Three flagpoles and a line of fixed bollards along Bishopsgate that delineate the boundary between the existing areas of private land and the public highway are to be removed; further increasing the amount of useable public footway.

Travel Plan

168. The application includes a framework Travel Plan. However, interim and full Travel Plans will be required (prior to occupation and within six months of first occupation respectively) to ensure that the tenants are promoting and encouraging sustainable travel methods. This would be secured through the S106 agreement.

Stopping up

169. A stopping-up plan is attached to this report. This shows an area of existing public highway to be stopped-up.

170. The proposed stopping-up is due to the westward realignment of the building to the same line as previously approved. The area of public highway that would be stopped up is on the south west corner of the site and totals 3.9sq.m. Two areas of private land totalling 48.17sq.m that are currently built on would become available for the public to walk over.

Security and Counter Terrorism

171. A number of internal and external security measures would be employed to address security issues which arise with a development of this size, location and nature.

172. Externally, perimeter protection would be provided by the facade construction and other measures to be agreed.

173. Details of the security measures would be sought by condition.

174. In line with policy CS3 of the City of London Local Plan 2015, the Developer would be required to pay costs towards implementing the necessary security measures to enhance the security of the development and the wider area (particularly Undershaft). The City Corporation has requested a security assessment to be carried out by the City of London Police Counter Terrorism Security Advisor (CTSA) to assess the security impacts of all new developments in the eastern cluster of tall buildings and their impacts on the wider area (in particular Undershaft). Should the outcome of the security assessment recommend or require alterations to, and additional infrastructure on the highway for the purposes of counter terrorism and security, the developer would be required to enter into a separate S.106 agreement unless the City confirms that no security agreement is required. The agreement would secure details of recommended highway adjustments, new security infrastructure, traffic orders required to authorise installation, maintenance and management by the City and the City of London Police.

Wind Microclimate

175. Using quantitative wind tunnel testing, in conjunction with two specialist service providers, the applicants have carried out a series of full "Lawson Criteria" pedestrian comfort assessments. These detailed assessments used an increased number of electronic probe locations (135 in the permitted scheme increased to 170) around the site and

looked at both the pavement and, unusually, vehicle carriageway environments.

Baseline Scenario (existing buildings)

176. The baseline scenario included the existing buildings on the site as well as the existing surrounding buildings and the under construction 22 Bishopsgate and 52 Lime Street.
177. In the “Worst Season” the tests indicated that the local comfort conditions on the pavement around 6-8 Bishopsgate and 150 Leadenhall Street are suitable for the current pedestrian activities. Conditions in and around the site are generally in the Standing range or calmer. Conditions around the south-west corner are marginally in the Strolling range, which is appropriate for pedestrian circulation.
178. Two of the additional probes in Leadenhall Street measured an exceedance of the able-bodied distress limit. These probes were located towards the middle of the road and were not in an area where pedestrians would have reason to generally access. Ideal conditions would not exceed the able-bodied distress limit but, given the location and limited pedestrian access, this would not be classified as unacceptable in respect to pedestrian comfort and safety.
179. Cyclists are sensitive to sudden gusts and cross-winds, particularly if the approaching journey has been notably calmer. The sensitivity to wind is heightened when negotiating a corner, where their posture would have a tendency to be leaning, as opposed to cycling straight, where their posture would naturally be upright. The wind direction (north-westerly) is most likely to be a head wind or tail wind depending on the direction of travel along Leadenhall Street. Cyclists would only be likely to use the middle of the road in this area if travelling east on Leadenhall Street, preparing to turn right into Whittington Avenue. However, the wind speeds are calmer at the point at which cyclists would be turning.

Cumulative Scenario

180. In the cumulative scenario with the proposed building, 22 Bishopsgate, 1 Undershaft and 1 Leadenhall Street all constructed, in the “Worst Season” the local conditions around the perimeter of the site would be generally within the standing to strolling range. There would, however, be a slight increase in windiness on the south-west corner of the site where the existing baseline condition at the pavement edge would increase from standing to walking.
181. One of the additional probes used in these tests measured an exceedance of the general public distress limit. This probe was located towards the middle of the road in Leadenhall Street where pedestrians would not generally access. There is no prescriptive guidance on wind speed limits for cyclists. An informed assessment has been carried out to consider the level of risk for cyclists based on wind direction, body posture, expectation and frequency. The wind direction (north west) in this case is a key consideration as it would be a head or tail wind rather than a crosswind and, therefore, unlikely to destabilise cyclists. The risk

to cyclists from exceeding the general public access distress limit at these locations is considered to be low.

182. In this scenario the results demonstrate that mitigation would not be required and that wind conditions would be appropriate for the intended pedestrian activities.

Cumulative Scenario without the proposed 1 Leadenhall Street Development (Worst Case)

183. In the event that the permitted scheme at 1 Leadenhall Street were not to be brought forward, the additional probes in Leadenhall Street indicate that during the “Worst Season” a total of six locations would exceed the general public access distress limit and one location would exceed the able-bodied access distress limit.
184. One location would be on the edge of the pavement adjacent to the south-west corner of the proposed development and three others would be located along the pavement adjacent to 1 Leadenhall Street (Leadenhall Court). These conditions would be unacceptable given that pedestrians would frequently use these routes as primary thoroughfares.
185. Three of the probe locations are in the roadway towards the middle of Leadenhall Street where there would be limited pedestrian access but cyclists could be affected. Of these, two exceed the general public access limit but given their location, would not be considered a risk to pedestrians. The levels of windiness for these two probes would be similar to conditions in the road measured in the baseline described above. The third probe location indicates an exceedance of the able-bodied access limit.
186. Although there are no specific criteria for cyclists, an exceedance of the able-bodied access distress wind speed would be considered too high a risk for cyclists and conditions would be regarded as unacceptable.
187. In this worst case scenario wind mitigation measures would be required in the highway along the east side of Bishopsgate and the south side of Leadenhall Street. The proposed mitigation measures identified at this stage would consist of the following:
- Two free-standing wind sculptures in Bishopsgate adjacent to the low block of the proposed development. The sculptures would be located in the line of the existing trees and would not encroach into sight lines to the signal head for vehicles travelling south on Bishopsgate.
 - Six 1.5-metre high shrubs in planter boxes along the edge of the pavement adjacent to the existing 1 Leadenhall Street. A maximum clear gap of 1 metre is permitted between the planters.
 - Staggered solid screens on Leadenhall Street adjacent to and perpendicular to the existing 1 Leadenhall Street. The staggered screens would be 2.8 metres apart and attached to the smaller

planter boxes for support. The self-weight of the planters would counteract over-turning effects from wind loading and avoid the need for foundations. Both screens would be 1.6 metres wide. The screen immediately adjacent to 1 Leadenhall Street would be 5.2 metres high and located at the first column line of the colonnade. The screen towards the edge of the pavement would be 2.6 metres high.

188. With the mitigation measures in place the six probes exceeding the general public access distress limit would be fully mitigated. The single probe location which exceeded the able-bodied access limit would also experience a significant improvement. Although the probe location would still exceed the general public access distress limit, the level of windiness is similar to the conditions measured in the baseline assessment and the risk to cyclists from exceeding the general public access distress limit at this location is considered to be low.

Wind Micro-climate Conclusions

189. The results demonstrate that mitigation is not required in the cumulative scenario or when 1 Leadenhall Street is demolished. Wind conditions in the cumulative scenario without any specific wind mitigation would be appropriate for the intended pedestrian activities.
190. In the event that the permitted scheme at 1 Leadenhall Street does not come forward or the site is not prepared for demolition i.e. hoardings erected, the wind mitigation measures would be required as a temporary measure until such time as works did progress at the 1 Leadenhall Street site.
191. The wind mitigation measures and their details would be the subject of a 'Grampian' planning condition.

Daylight and Sunlight

192. Loss of daylight and outlook is a material planning consideration. Policy DM10.7 of the Local Plan seeks "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to levels which would be contrary to the Building Research Establishment's guidelines".
193. A report has been submitted analysing the effect of the proposal on daylight and sunlight to the Leatherseller's Company overnight sleeping accommodation at 33 Great St Helen's, which is ancillary to the livery company use.
194. The analysis has been carried out in accordance with the Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight and Sunlight". The guidelines are advisory rather than mandatory and need to be interpreted flexibly, taking into account other factors which might also affect the site.
195. The analysis indicates that the neighbouring residential property would continue to meet the BRE criteria for Vertical Sky Component (VSC), No Skyline (NSL), Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH) with no noticeable loss of daylight or sunlight.

196. There are no other residential premises where daylight or sunlight would be affected by this proposal.

Amenity Space

197. The BRE guidance on sunlight to a garden or amenity area advises that for it to be adequately sunlit throughout the year no more than 40%, and preferably no more than 25%, should be in permanent shade on 21st March.
198. The amenity space around the Site that could potentially be impacted by the proposed development is the space directly in front of St Helen's Bishopsgate Church.
199. The supporting data submitted by the applicant indicates that no part of this area would be affected by the proposal.
200. Crosby Square to the north of the proposal site has not been assessed as the 22 Bishopsgate scheme stands between the square and the proposed building.

Other Properties

201. Sunlight to the stained glass windows of St Helen's Bishopsgate Church would not be affected by the proposed development.

Solar Glare

202. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Viewpoints for the analysis were positioned at points before a junction or traffic lights where a distraction to motorists might occur. The viewpoint was positioned at 1.5m above ground at the height of a sitting driver and pointing down the centreline of the road where drivers' vision is critical.
203. The environmental statement highlighted a potential significant effect on motorists and cyclists between 10:30am and 12:00pm from March to September. The glazing on the southern facade is not contiguous and would be recessed reducing the impacts, breaking up the glare and isolating the points at which it could be seen at any given moment.
204. The permitted 1 Leadenhall Street development, when constructed, would cast a shadow on the proposed development which would eliminate the reflected solar glare for road users. Should the 1 Leadenhall Street scheme or a similarly sized development on that site be constructed, there would be no need for specific mitigation measures.
205. The Applicant is considering a range of mitigation options, which would form part of further development, such as, changing the orientation of the glazed facade elements, the use of low reflective glazing or the addition of louvres.
206. Details of the mitigation of the potential solar glare, is the subject of a condition.

Sustainability and Energy

207. As part of the supporting documentation, the applicants have submitted a Sustainability Statement, including a BREEAM New Construction 2014 pre-assessment, and an Energy Strategy.
208. By utilising passive design and energy efficiency measures, the development is estimated to achieve 26.5% carbon emissions savings over the Building Regulations 2013 compliant baseline scheme. The connection of the development into a district heating network would currently not be possible but the opportunity for a future connection would be provided.
209. The carbon emissions savings would be further increased by the installation of louvres with photovoltaic panels with a size of 290sq.m on the roofs of the plant room, the pavilion and level 48. In addition, hot water heat recovery is proposed. Both measures would contribute a 2.3% reduction in carbon dioxide emissions. The submitted energy strategy demonstrates that the development has the potential to achieve an overall 28.9% carbon emission reduction over a Building Regulations compliant building. This would result in a shortfall of 6.1% carbon emissions savings in relation to the London Plan target of 35% and offset payments would be required if evidence cannot be provided to demonstrate that this building type cannot meet the target on site. Details of the final energy strategy to be adopted for the development will be required by condition.
210. The BREEAM pre-assessment rating for the building has an “excellent” rating and indicates no outstanding issues which should be addressed in a City context. Further potential credits will be targeted in the detailed design stage of the development.
211. The sustainability statement addresses climate change adaptation and sustainable design of the development, in particular energy efficiency, sustainable materials, conserving water resources, sustainable drainage, waste management, pollution, urban greening and biodiversity. Landscaped terraces with raised planter beds would be provided at levels 11 and 26. Details of the installation of small, extensive green roofs on the terraces are required as part of the condition in relation to landscaping.

Sustainable Urban Drainage Systems

212. Rainwater storage and rainwater harvesting is proposed to address sustainable drainage. The proposed range of climate change adaptation and sustainable design measures is considered to be acceptable, subject to further details to be considered under the conditions.

Demolition and Construction

213. A Demolition and Construction Method Statement for the scheme is required by condition.

Archaeology

214. The site is in an area of high archaeological potential at the centre of the Roman town and to the north of the Roman basilica forum. There is high potential for Roman domestic and workshop buildings to survive and the main Roman road between the basilica and Bishopsgate crossed the western part of the site. There is moderate and low potential for the survival of remains from later periods. An Historic Environment Assessment and Addendum have been submitted with the application.
215. The existing buildings have basements to varying depths which have removed archaeological remains over most of the site. The areas where archaeology may survive are below a single basement in the central service area and the western and southern perimeter where it is likely that the basements of previous buildings may survive as well as Roman and medieval remains.
216. The proposed building would have three basement levels extending across the entire site. Two areas of impact are proposed outside the existing basement, for new foundations and a rainwater attenuation tank. The impact would be to remove any surviving archaeological remains. Archaeological evaluation is necessary to provide additional information on the nature, date and character of archaeological remains. The applicants have confirmed that it has not been possible to carry out evaluation as the buildings are occupied.
217. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work to record remains that would be disturbed by the proposed work and foundation design.

Planning Obligations and Community Infrastructure Levy

218. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City's environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
219. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
220. The CIL contributions are set out below:

Mayoral Community Infrastructure Levy (CIL)

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
Mayoral Community Infrastructure Levy	£2,622,500	£2,517,600	£104,900

payable			
Mayoral planning obligation net liability*	£4,583,260	£4,583,260	-
Administration and Monitoring Charge	£3,500	-	£3,500
Total liability in accordance with the Mayor of London's policies	£7,209,260	£7,100,860	£108,400

*Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£3,876,300	£3,682,485	£193,815
City Planning Obligation Affordable Housing	£1,049,000	£1,038,510	£10,490
City Planning Obligation Local, Training, Skills and Job Brokerage	£157,350	£155,777	£1,574
City Carbon Offsetting	£196,200	£194,238	£1,962
City Security and Design Evaluation Contribution	£50,000	£49,500	£500
City Non-Financial Monitoring Charge	£3,750		£3,750
Total liability in accordance with the City of London's policies	£5,332,600	£5,120,510	£212,091

City's Planning Obligations

221. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Affordable Housing Contribution
- Carbon Offsetting Contribution

- Delivery and Servicing Management Plan (Consolidated Deliveries)
- Local Training, Skills and Job Brokerage Strategy (Demolition)
- Local Training, Skills and Job Brokerage Strategy (Construction)
- Local Training, Skills and Job Brokerage Contribution
- Local Procurement Strategy
- Monitoring Costs Contribution
- Remedial Highway Works (S278 agreement)
- Security Design and Evaluation Contribution (£50,000)
- Security S106 Agreement
- Viewing Gallery Management Plan
- Restricted use of Highway associated with A3 units
- TV Mitigation
- Solar Glare
- Travel Plan
- Utility Connections to the Development

222. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administration Costs

223. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

224. The applicant will pay the City of London's legal costs and the City's Planning Officers' administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

225. The City will use CIL to mitigate the impact of development and provide necessary infrastructure but in some circumstances it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are still yet to be fully scoped.

Conclusion

226. The proposal reflects the previously approved scheme in terms of its footprint and the provision of a tall building within the City's cluster of tall buildings and accords with the strategic objective to ensure that the City maintains its position as the world's leading international financial and business centre and with the strategic objective to focus and promote a significant increase in office floorspace in the Eastern Cluster. The building would deliver approximately 4.6% of the

additional office floorspace sought in Policy CS1 to meet the needs of projected long term economic and employment growth.

227. The scheme could provide a total of 644sq.m (GEA) of new retail floorspace.
228. The provision of a publicly accessible viewing gallery, available free of charge, for up to 50 members of the public at any one time, would provide substantial public benefit.
229. The scheme's reliance on public transport meets the transport policies in the London Plan and Local Plan. This will have the benefits of maintaining the strength of the City in economic terms and making effective and efficient use of the infrastructure necessary to sustain such concentrations of development.
230. The proposal would provide a distinctive building whose sculptural design creates a positive relationship with the office developments in the Eastern Cluster.
231. This development would not detract from the City's conservation areas, listed buildings or be detrimental to the setting of the Tower of London World Heritage Site or of St. Paul's Cathedral.
232. The proposal is in compliance with the provisions of the development plan.
233. The proposed building would be serviced from Undershaft and this would not compromise any future proposals for a controlled zone or security infrastructure in the eastern cluster area.
234. After considering and balancing all of the above circumstances, I recommend that planning permission be granted as set out in the Recommendation and Schedule.

Background Papers

Internal

Memo 24.05.2017 City of London Markets and Consumer Protection, Pollution Team

Email 06.09.2017 City of London Markets and Consumer Protection, Pollution Team

External

Letter 24.05.2017 Historic England

Email 01.06.2017 Natural England

Email 05.06.2017 Thames Water

Letter 06.06.2017 City of Westminster

Email 08.06.2017 London City Airport

Letter 08.06.2017 LB Tower Hamlets

Letter	07.07.2015	Sprunt Limited
Letter	17.07.2015	Greater London Authority
Email	03.08.2017	Mr. Peter Rose
Letter	09.08.2017	City of Westminster
Letter	09.08.2017	Historic England
Letter	21.08.2017	Environment Agency
Letter	21.08.2017	LB Tower Hamlets
Email	04.09.2017	Mr. Peter Rose
Letter	11.09.2017	City of Westminster
Letter	13.09.2017	LB Tower Hamlets

Application Documents

Design and Access Statement by Wilkinson Eyre Architects rec'd 04.05.2017

Planning Statement by Gerald Eve rec'd 04.05.2017

Environmental Statement Volume 1: Main Text by ARUP rec'd 04.05.2017

Environmental Statement Volume 1: Appendices by ARUP rec'd 04.05.2017

Environmental Statement Addendum Volume 1 by ARUP rec'd 11.05.2017

Environmental Statement Volume 2: Townscape, Heritage and Visual Impact Assessment by Millerhale Tavernor rec'd 04.05.2017

Environmental Statement Volume 3: Non-Technical Summary by ARUP rec'd 04.05.2017

Transport Assessment by ARUP rec'd 04.05.2017

Energy Statement by ARUP rec'd 04.05.2017

Sustainability Statement by ARUP rec'd 04.05.2017

Environmental Statement Addendum (Wind Mitigation) by ARUP rec'd 01.08.2017

Illustrative Drawings and Sketches Outline Wind Mitigation Scheme (Ref: 0997-WEA-SB- A-0030) by Wilkinson Eyre Architects rec'd 01.08.2017

Existing Drawings: 00997-WEA-XX-XX-PD-A-0000, PD-A-0009, PD-A-0010, PD-A--0011, PD-A-0020; 00997-WEA-XX-W-PD-A-2012 Rev. 1, S-PD-A-2013 Rev. 1, E-PD-A-2014 Rev. 1, N-PD-A-2015, W-PD-A-2200 Rev. 1, S-PD-A-2201 Rev. 1, E-PD-A-2202 Rev. 1, N-PD-A-2203, W-PD-A-2300 Rev. 1, S-PD-A-2301 Rev. 1, E-PD-A-2302 Rev. 1, N-PD-A-2303.

00997-WEA-XX-SK-0149 Rev.02

Appendix A

London Plan Policies

The London Plan is part of the development plan for the City. As such the London Plan is a material consideration to which the City of London Corporation must have regard in exercising its development control powers.

The London Plan policies which are most relevant to this application are set out below:

- Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.
- Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.
- Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.
- Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.
- Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.
- Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance
- Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.
- Policy 5.11 Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

- Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.
- Policy 6.5 Contributions will be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate.
- Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.
- Policy 7.6 Buildings and structures should:
 - (a) Be of the highest architectural quality;
 - (b) Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
 - (c) Comprise details and materials that complement, not necessarily replicate, the local architectural character;
 - (d) Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
 - (e) Incorporate best practice in resource management and climate change mitigation and adaptation;
 - (f) Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
 - (g) Be adaptable to different activities and land uses, particularly at ground level;
 - (h) Meet the principles of inclusive design;
 - (i) Optimise the potential of sites.
- Policy 7.7 Tall and large buildings should be part of a planned approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in this policy.
- Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

- Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.
- Policy 7.13 Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.
- Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

CS13 Protect/enhance significant views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime

of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
 4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
 5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
 6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;

- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

DM20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
 3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
 4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
 5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 17/00447/FULEIA

6-8 Bishopsgate And 150 Leadenhall Street London EC3V 4QT

Demolition of existing buildings and the erection of a new building comprising lower ground level, three basement levels, ground floor plus part 10, 25 and 51 storeys including plant [221.2m AOD] to provide office (Class B1) use [85,892sq.m GEA], flexible shop/cafe and restaurant (Class A1/ A3) uses [445sq.m GEA] at part ground floor and level 1 and flexible shop/cafe/restaurant/office (A1/A3/B1) uses [199sq.m GEA] at part ground floor and level 1; The provision of a publicly accessible roof top viewing gallery (Sui Generis) [819sq.m GEA] at level 50 with dedicated entrance at ground floor level; the provision of hard and soft landscaping. [TOTAL 87,355sq.m GEA].

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 No works above ground floor level are permitted unless the substantial demolition of 1 Leadenhall Street (Leadenhall Court) has commenced or a detailed wind microclimate mitigation scheme based on the outline wind mitigation scheme set out in the Environmental Statement has been submitted to and approved by the Local Planning Authority. The approved mitigation measures shall be installed prior to the practical completion of the development (unless demolition of Leadenhall Court has commenced in the intervening period).
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2.
- 3 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. In the event that site contamination is found it must be reported in writing to the Local Planning Authority within five working days and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and

approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the local planning authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the following policy of the Local Plan: DM15.8.

- 4 Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

REASON: To avoid sewage flooding and to ensure that sufficient capacity is made available to cope with the new development in order to avoid adverse environmental impacts.

- 5 Before the development hereby permitted is begun, impact studies of the existing water supply infrastructure must be submitted to, and approved in writing, by the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

REASON: To ensure that the water supply infrastructure has sufficient capacity to cope with the additional demand.

- 6 Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following:

Details of cranes and other tall construction equipment (including crane locations, operating heights and details of obstacle lighting). Such schemes shall comply with Advice Note 4 'Cranes and Other Construction issues' (available at www.aoa.org.uk/operations&safety/safeguarding.asp).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace.

- 7 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 8 Before any works including demolition are begun a survey of the highways and other land at the perimeter of the site shall be carried out and submitted to the Local Planning Authority showing the existing Ordnance Datum levels of the adjoining streets and open spaces.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order to create a record of the conditions prior to changes caused by the development.

- 9 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site deconstruction of the existing buildings has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).

REASON: To ensure that deconstruction works do not have an adverse impact on the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM16.1. and London Plan Policy 6.14.

- 10 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site identifying

efficiency and sustainability measures, including the use of freight consolidation, to be undertaken during site construction of the development has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).
REASON: To ensure that construction works do not have an adverse impact on the transport network in accordance with the following policies of the Local Plan: DM15.6, DM 15.7,DM16.1 and London Plan Policy 6.14.

- 11 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during demolition shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 12 A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction shall be submitted to and approved in writing by the Local Planning Authority prior to any construction work taking place on the site. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to

construction in order that the impact on amenities is minimised from the time that the construction starts.

- 13 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 14 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 15 Before any construction works hereby permitted are begun additional details and information in respect of the following shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Details of the measures proposed to mitigate the impacts of solar glare.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 16 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 17 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 18 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 19 No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.
REASON: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure.
- 20 Before any construction works hereby permitted are begun details of rainwater collection, harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1.
- 21 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of the trees which are to be retained including their root system and the approved details shall be

implemented prior to and during the course of the building works as appropriate.

REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated before the design is too advanced to make changes.

- 22 Before any construction works hereby permitted are begun the following details and information shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) details of provision within the building facades for the inclusion of street lighting;

REASON: In the interests of public safety and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM10.1.

- 23 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) Particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;

(b) Large scale (1:10) details of the proposed new facade(s) including typical details of the fenestration and entrances;

(c) Large scale (1:10) details of ground floor elevations;

(d) Large scale (1:5) details of soffits, hand rails and balustrades;

(e) Details of junctions with adjoining premises;

(f) Details of the integration of cleaning equipment, cradles and the garaging thereof;

(g) Details of all ground level surfaces including materials to be used;

(h) Details of external surfaces within the site boundary including hard and soft landscaping;

(i) Details of all external lighting.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2, DM15.7.

- 24 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

- 25 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: green roofs, blue roofs, attenuation tanks, rainwater pipework, hydrobrakes, pumps, rainwater harvesting system, design for system exceedance; surface water flow rates shall be restricted to no greater than 10 l/s, provision should be made for an attenuation volume capacity capable of achieving this;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 26 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 27 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 28 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 29 Details of the position and size of the green roof(s) and other landscaping features, the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 30 The measures identified within the submitted Energy Strategy (Ref: 233716 by ARUP) shall be incorporated into the development and maintained for the life of the development.
REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 31 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 32 The 'Life Safety Generator' shall be used solely on brief intermittent and exceptional occasions when required in response to a life threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise its noise impact and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.
REASON: To ensure that the generator, which does not meet City of London noise standards, is used only in response to a life threatening emergency situation.

- 33 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
- 34 The proposed office development, sharing a party element with non-office premises, shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 35 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 36 No cooking shall take place within any Class A1 or A3 units hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 37 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development, and be no lower than stated in the air quality assessment submitted, in order to ensure maximum dispersion of pollutants.

REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.

38 A. No CHP plant shall at any time be installed in the building unless the air quality impact of the CHP emissions have been assessed and a report detailing the assessment has been submitted to and approved in writing by the Local Planning Authority.

B. Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:

(i) The results of an emissions test demonstrating compliance with Part A of this condition and stack discharge velocity, carried out by an accredited laboratory/competent person; and

(ii) An equipment maintenance schedule demonstrating that the emission standard would always be met.

C. The CHP plant shall at all times be maintained in accordance with the approved schedule.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

39 No boilers that have a NO_x emission level exceeding that detailed in the submitted air quality impact assessment shall at any time be installed in the building.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B (a) and (c) of the London Plan.

40 A further set of doors must be fitted between the Class A1 and/or Class A3 and the street and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

41 In respect of the Class A1 and/or Class A3 units, no live or recorded music shall be played that can be heard outside the premises or within any other premises in the building.

REASON: To safeguard the amenity of the adjoining premises and the area in general in accordance with the following policy of the Local Plan: DM15.7

42 No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 43 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 44 Unless otherwise agreed in writing, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 961 pedal cycles. The cycle parking provided on the site must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and to assist in reducing demand for public cycle parking in accordance with Transport for London guidance.
- 45 The changing facilities and showers adjacent to the bicycle parking areas and indicated on approved drawing 0997-10-P-0510, shall be provided and maintained throughout the life of the building for the use of occupiers of the building.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.5.
- 46 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 47 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
- 48 The vehicular parking provided on the site must remain ancillary to the use of the building and shall be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors.

REASON: To ensure that the parking spaces provided remain ancillary to the use of the building in accordance with the following policy of the Local Plan: DM16.5.

- 49 The approved loading and unloading areas shall be available at all times for use throughout the life of the building for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing facilities are maintained in accordance with the following policy of the Local Plan: DM16.5.
- 50 The pass doors shown adjacent to or near to the main entrances to the building on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that people with mobility disabilities are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 51 A clear unobstructed headroom of 5m must be maintained for the life of the buildings in the refuse skip collection area and a clear unobstructed headroom of 4.5m must be provided and maintained in all other areas (including access ways) to be used for loading and unloading.
REASON: To ensure satisfactory servicing facilities in accordance with the following policy of the Local Plan: DM16.5
- 52 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 53 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
- 54 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 55 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 56 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 57 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:
Drawing nos:
00997-WEA-XX-XX-PD-A-0101; 00997-WEA-XX-LG-PD-A-0510, BM-PD-A-0515, B1-PD-A-0520, B2-PD-A-0530, F1-PD-A-0540, GF-PD-A-1000, 01-PD-A-1010, 02-PD-A-1020, 03-PD-A-1030, 06-PD-A-1060, 09-PD-A-1090, 11-PD-A-1110, 16-PD-A-1160, 21-PD-A-1210, 23-PD-A-1230, 24-PD-A-1240, 25-PD-A-1250, 26-PD-A-1260, 35-PD-A-1350, 47-PD-A-1470, 48-PD-A-1480, 49-PD-A-1490, 50-PD-A-1500, 51-PD-A-1510, RF-PD-A-1520, W-PD-A-2200, S-PD-A-2201, E-PD-A-2202, N-PD-A-2203, W-PD-A-2300, S-PD-A-2301, E-PD-A-2302, N-PD-A-2303, AA-PD-A-3301, BB-PD-A-3302, XX-PD-A-5001, XX-PD-A-5002, XX-PD-A-5003, XX-PD-A-5004, XX-PD-A-5005, XX-PD-A-5006, XX-PD-A-5007, XX-PD-A-5008, XX-PD-A-5009.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
- detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;
- a full pre application advice service has been offered;
- where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.

- 3 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 4 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 5 The Directorate of the Built Environment must be consulted on the following matters which require specific approval:
 - (a) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.
 - (b) Permanent Highway Stopping-Up Orders and/or dedication of land for highway purposes.
 - (c) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (d) The incorporation of street lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City.
 - (e) Connections to the local sewerage and surface water system.

- (f) Carriageway crossovers.
 - (g) Means of escape and constructional details under the Building Regulations and London Building Acts (District Surveyor).
 - (h) The display of any advertisement material on the premises which may be subject to the City of London Corporation's Byelaws.
- 6 The enabling of archaeological work to meet the requirements of conditions 16, 17 and 18 is the responsibility of the developer and should be regarded as an integral part of the development programme in accordance with the policies of the Unitary Development Plan and Core Strategy. This would include on site facilities, funding, fieldwork, post excavation analysis and reporting and publication of the work in accordance with recognised guidelines and codes of practice. This is to ensure adequate "preservation by record" of the archaeological resource affected by the proposed development.
- 7 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:
- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
 - (b) Installation of engine generators using fuel oil.
 - (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site and compliance with the Construction (Design and Management) Regulations 2007; the Environmental Health Team should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
 - (d) Alterations to the drainage and sanitary arrangements.
 - (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments (including the Offices, Shops and Railway Premises Act 1963); in particular:
 - the identification, encapsulation and removal of asbestos in accordance with a planned programme;
 - provision for window cleaning (internal and external) to be carried out safely.
 - (f) The use of premises for the storage, handling, preparation or sale of food.
 - (g) Use of the premises for public entertainment.
 - (h) Approvals relating to the storage and collection of wastes.
 - (i) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
 - (j) The control of noise from plant and equipment;
 - (k) Methods of odour control.

- 8 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a) The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b) Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c) Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

Air Quality

(d) Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant

(e) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x

emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2011.

(f) All gas Combined Heat and Power plant should be low NOX technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2011.

(g) When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(h) Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(i) Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(j) There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(k) Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Food Hygiene and Safety

(l) Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(m) If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 9 The investigation and risk assessment referred to in condition 2 "Contaminated Land" must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
 - human health,
 - property (existing or proposed) including buildings, open spaces, service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

10 Thames Water advises:

(1) The developer is advised to contact Thames Water Development Services (0845 850 2777) to discuss the details of the piling method statement required by a condition of this planning permission.

(2) Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing, and site remediation. Groundwater permit enquiries should be directed to Thames Water, Risk Management Team by telephoning 020 8507 4890 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provision of the Water Industry Act 1991.

(3) It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or suitable sewer. It is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate, and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

(4) Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet 'Best Management Practices for Catering Establishments' which can be requested by telephoning 01923 898 188.

(5) The developer should incorporate with their proposals, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

(6) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water's pipes. The developer

should take account of this minimum pressure in the design of the proposed development.

(7) A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

(8) Thames Water would recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses.

(9) The development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

11 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

12 The Environment Agency advises:

(a) Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.

(b) If piling is proposed, a Piling Risk Assessment will be required to demonstrate that the chosen piling method does not increase the risk of near-surface pollutants migrating into deeper geological formations and aquifers. A Hydrogeological Risk Assessment of physical disturbance to the aquifer should also be undertaken and if

unacceptable risks are identified, appropriate mitigation measures must be provided.

(c) We recommend that developers follow the risk management framework provided in our guidance for 'Piling into Contaminated Sites' and also refer to the document: 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention'

- 13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 14 Protection may be needed for any tree in a public highway or open space near to the site. Such protection will need approval by the Open Spaces Department. Any pruning requirement must only be undertaken by or with the prior approval of the Open Spaces Department. The developer is advised to contact the Director of Open Spaces prior to demolition or other development works commencing regarding the protection of nearby trees during works (Contact: Open Spaces, City Gardens - 020 7374 4127 or email - parks.gardens@cityoflondon.gov.uk).
- 15 You are requested to notify the Chief Planning Officer on commencement of the development in order that the works can be inspected and monitored.
- 16 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

17/00447/FULGA

PLANNING & TRANSPORTATION		
PSDD	CPO	PPD
TPD	11 JUL 2017	LTP
OM		SSE
No		PP
FILE	129310	PD

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Ref: 12530/4.1/RS

The Department of the Built Environment City of London
PO Box 270
Guildhall
London EC2P 2EJ

7 July 2017

Dear Sirs,

6-8 Bishopsgate and 150 Leadenhall Street

We have been instructed by our Client, C C Land Holdings Limited, to write following a letter they have received in respect of a planning application for the demolition of existing buildings and redevelopment to provide a new building comprising lower ground and three levels of basement for parking, servicing, and ancillary plant and storage; ground plus part 10, 25 and 51 storeys including plant, containing offices (B1), flexible shop/ café and restaurant uses (A1/ A3) at part ground floor and level 1, and flexible shop/ café, restaurant, and office uses (A1/ A3/ B1) at part ground floor and level 1; and roof top Pavilion (sui generis) with public access to a viewing gallery at level 50 from a ground floor entrance; the provision of hard and soft landscaping; and other incidental works, at 6-8 Bishopsgate and 150 Leadenhall Street. Local Planning Authority reference number 17/00447/FULEIA.

C C Land Holdings Limited is the ultimate beneficial owner of the adjacent Leadenhall Building and, following assessment of the information provided, have instructed to us to strongly object to this revised proposal and make representations on their behalf to voice their concerns.

The Local Plan promotes the City of London as a leading driver of the London and national economies, contributing 14% of London's GDP and an estimated 3.1% of the UK's GDP. Offices are identified as making up over 70% of all buildings and many of them are occupied by financial and business services.

A key challenge facing the City, is the delivery of sustainable long-term economic growth to support the London and national economies, and it should be a balance between providing for this new development and retaining and improving the best of the current building stock such as the Leadenhall Building.

The City is the heart of the world's leading international financial, commercial and maritime centre, of which the Leadenhall Building is key. It provides a major source of employment for London and its surrounding regions and is a vital asset to the national economy, offering the right business conditions and a very high quality environment for the City's commercial occupiers, this is evidenced by its full occupancy rate by high profile firms.

The proposed scheme comprises 51 storeys in total which is made up of 4 blocks comprised of part 10, part 25 and part 51 storeys. This represents an increase of 1 part additional storey to the lower block, 4 to the mid-block and 5 storeys to the higher block (the pavilion sits on top of the upper block and is also enlarged from the Consented Scheme).



ACKNOWLEDGED
sprunt

Registered Office: Sprunt Limited 20 Northdown Street London N1 9BG
Registered in England No: 03118853

2

12530/4.1/RS

7 July 2017

6-8 Bishopsgate and 150 Leadenhall Street

Views of the Leadenhall Building from the west are an important consideration, and appear to have influenced the bulk and massing of the proposed building. Importantly, however it is evident that the relationship with the Leadenhall Building of the proposed scheme will alter significantly from the consented scheme due to the increase in height and the additional storey proposed.

It is apparent when assessing the levels of the Leadenhall Building that there would be a greater impact in terms of mass, bulk and subsequent outlook to level 8 of the Leadenhall Building due to the proposed additional storey to the lower block; a greater impact upon levels 19 to 23 due to the additional 4 storeys to the mid- block and a greater impact to levels 40 to 46 due to the proposed additional five floors to the higher block and the pavilion above, resulting in a building that would appear unduly intrusive and oppressive to some of the occupiers of the Leadenhall Building, an important and legitimate consideration when considering their amenity which we believe is contrary to policy CS10 of the Local Plan.

These upper floors serve the most high-profile occupiers who demand a specific type of floorspace. It is this office accommodation in particular that will be adversely affected as a result of the proposed application, reducing the attractiveness of the Leadenhall Building and subsequent draw to the City as a world leading financial, commercial and maritime centre and as a result adversely affecting the London and national economies.

We respectfully request that these comments are fully considered in the determination of this application.

Yours faithfully,



Robert Sprunt
Sprunt Ltd.

cc. Jimmy Cho, C C Land Holdings Limited
Dickie Wong, C C Land Holdings Limited

Broughton, Helen

From: PLN - Comments
Subject: FW: ref17/00447/FULEIA

From: Peter Rose
Sent: 03 August 2017 10:17
To: PLN - Comments
Subject: ref17/00447/FULEIA

Dear Sirs

I object to this development on the grounds of further densification in this already overdeveloped location. It will also affect our property with regard to casting of shadows/light and impacting our view. I am a residential occupier.

Kind Regards,

Peter Rose

Jamaica Buildings,
St. Michael's Alley
London
EC3V 9DS

Hassall, Pam

From: PLN - Comments
Subject: FW: ref 17/00447/FULEIA case officer Tony Newman

From: Peter Rose [<mailto:peter@roseassociates.org.uk>]
Sent: 04 September 2017 12:12
To: PLN - Comments
Subject: ref 17/00447/FULEIA case officer Tony Newman

Dear Sirs

I attach my response to your earlier letter and would wish to repeat this in response to your letter of 30 August 2017.

Kind Regards,

Peter Rose

Jamaica Buildings,
St. Michael's Alley
London
EC3V 9DS

peter@roseassociates.org.uk

Begin forwarded message:

From: Peter Rose <peter@roseassociates.org.uk>
Subject: ref17/00447/FULEIA
Date: 3 August 2017 at 10:16:42 BST
To: PLNComments@cityoflondon.gov.uk



Dear Sirs

I object to this development on the grounds of further densification in this already overdeveloped location. It will also affect our property with regard to casting of shadows/light and impacting our view. I am a residential occupier.

Kind Regards,

Peter Rose

Jamaica Buildings,
St. Michael's Alley
London
EC3V 9DS

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Committees:	Dates:	
Planning and Transportation Committee Projects Sub Court of Common Council	30 October 2018 07 November 2018 06 December 2018	
Subject: Blackfriars Bridge Parapet Refurbishment and Bridge Re-Painting	Gateway 3/4 Options Appraisal(Regular)	Public
Report of: Director of the Built Environment Report Author: Thomas Creed	For Decision	

Summary

Since the last Gateway, AECOM have produced a study, to identify the options for refurbishing the bridge, considering the access restrictions

- The four options considered are:
 - Do nothing.
 - Paint only.
 - Repair parapet.
 - Replace all balusters.
- Procurement Route:
 - The design work shall be carried out by our term consultant AECOM
 - The recommended option is over the OJEU tender limit and so a full OJEU tender process will need to take place for the works contract.
- Financial Summary:
 - Estimate Cost of Project : £8,570,000
 - Budget approved to date : £50,000
 - Spend to date : £30,532
 - Risk Budget (included in total estimate cost) : £1,055,000
- RAG Status: Amber due to access issues and unknown condition of painted cast iron elements.

Recommendations

It is recommended that:

- For Planning and Transportation and Projects Sub Committees
 - As the parapet has been shown to be of sufficient strength, the project proceeds with Option 3, a full refurbishment of Blackfriars Bridge with repair and replacement of the cast iron features as required; working around the current access restrictions.
- For Projects Sub Committee
 - AECOM (term consultant) are instructed to proceed with detailed design and prepare tender documents.
 - Despite the expected cost of the project now exceeding £5million; the project continues on the regular approval route and proceeds to Gateway 5 (expected October 2019). This is requested as options going forward are limited given the historic nature of the structure.

As the value for the project is expected to be over £5m, Gateway 4b approval will be sought from Court of Common Council.

Options Appraisal Matrix

See attached.

Appendices

Appendix 1	PT 4 Procurement form
Appendix 2	AECOM Options Report
Appendix 3	Project Risk Register (recommended option)
Appendix 4	Note of the BHE Charity Trust Role
Appendix 5	Project Coversheet

Contact

Report Author	Thomas Creed
Email Address	Thomas.creed@cityoflondon.gov.uk
Telephone Number	020 7332 3913

Options Appraisal Matrix

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
1. Brief description	Do Nothing	Paint Only	Repair Parapet	Replace all Balusters
2. Scope and exclusions	The load testing of the parapets demonstrated that the structural condition of the parapets is satisfactory. With the numerous access restrictions to the site; carry out no further works until the access restrictions have lifted and/or there is an immediate structural concern.	Repaint of whole bridge; subject to access restrictions Metalwork patched and filled in a non-structural way. Continuous work to refurbish whole bridge; subject to approval of working methodology from all relevant stakeholders	Replacement of some of the baluster columns as required Repair of other cast iron elements as required Repaint of whole bridge; subject to access restrictions Continuous work to refurbish whole bridge; subject to approval of working methodology from all relevant stakeholders	Full reconstruction of parapet Repair of other cast iron elements as required Repaint of whole bridge; subject to access restrictions Continuous work to refurbish whole bridge; subject to approval of working methodology from all relevant stakeholders
<i>Project Planning</i>				
3. Programme and key dates	No work proposed until 2023 unless there is an immediate safety issue.	Site investigations – December 2018	Site investigations – December 2018	Site investigations – December 2018

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
		<p>Completion of design and tender documentation – Jan 2019</p> <p>Tender Returns and evaluation – August/September 2019</p> <p>Gateway 5 (Authority to Start Work) – October 2019</p> <p>Estimated Completion – September 2020</p>	<p>Completion of design and tender documentation – Jan 2019</p> <p>Tender Returns and evaluation – August/September 2019</p> <p>Gateway 5 (Authority to Start Work) – October 2019</p> <p>Estimated Completion – October 2020</p>	<p>Completion of design and tender documentation – Jan 2019</p> <p>Tender Returns and evaluation – August/September 2019</p> <p>Gateway 5 (Authority to Start Work) – October 2019</p> <p>Estimated Completion – April 2021</p>
4. Risk implications	<p>Reduces project risk as access issues are minimised.</p> <p>Increases risk of structural degradation over time.</p>	<p>Does not improve the risk of structural degradation over time.</p> <p>Increases the risk of hidden defects in the metalwork, hidden by the cosmetic repairs</p>	<p>Reduces the risk of future defects occurring in the parapet.</p> <p>Further defects in the existing metalwork are likely to be exposed on site.</p>	<p>Significantly reduced risk that parapet defects will re-occur.</p>
5. Benefits and disbenefits	<p>Bridge structure may be at risk due to failure of protective coating</p> <p>Aesthetic of bridge will be besmirched for longer.</p>	<p>Aesthetics of the bridge will be improved quickly.</p> <p>Repairs are not likely to be long lasting and degradation is likely to be</p>	<p>Preserves the original cast iron parapet.</p> <p>Parapet has been shown to be of sufficient strength and therefore appropriate repair will minimise any</p>	<p>Increased cost compared to Option 2 but would increase useful life of bridge.</p>

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
		widespread when it occurs.	issues with the adjacent structure in comparison to Option 4.	Removed part of the original structure.
6. Stakeholders and consultees	Residents and business users	<ul style="list-style-type: none"> • Transport for London • Thames Tideway Tunnel Project • Port of London Authority • Metropolitan and City of London Police • Network Rail • Historic England • Residents and business users 		
Resource Implications				
7. Total Estimated cost	Initially zero but may lead to further costs in the future due to the deterioration of the structure	Works: £5,750,000 Fees: £200,000 Risk: £1,055,000 Staff Costs: £80,000 Total: £7,085,000	Works: £7,235,000 Fees: £200,000 Risk: £1,055,000 Staff Costs: £80,000 Total: £8,570,000	Works: £10,450,000 Fees: £280,000 Risk: £1,500,000 Staff Costs: £100,000 Total: £12,330,000
8. Funding strategy	Sums currently identified in Bridge House Estates 50year Bridge Repair & Maintenance Fund. The funding will be re-programmed to match the chosen option.			

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
9. Estimated capital value/return	Supplementary Revenue Project			
10. Ongoing revenue implications	This option would increase maintenance requirements significantly as the structure deteriorates.	This option would not fully preserve the structure and further maintenance visits would be required as the paint system deteriorated.	Work would preserve the structure and minimise implications to ongoing maintenance	Maintenance requirements of the parapets would reduce as the metalwork is replaced
11. Investment appraisal	N/A			
12. Affordability	N/A			
13. Legal implications	<p>The City of London Corporation, as trustee of Bridge House Estates, has a statutory duty under the Blackfriars Bridge Act 1863 to maintain and repair Blackfriars Bridge out of the rents and profits of the Bridge House Estates.</p> <p>As this structure has Grade II listed status, any alterations which affect its character as a building of special architectural or historic interest will require listed building consent.</p> <p>Consultation will be required with Transport for London who are Highway Authority for the bridge.</p> <p>A separate legal review was carried out to determine whether the City has an obligation to increase the height of the existing pedestrian parapets as they are lower than current design standards. It was concluded that as the British Standard for a pedestrian parapet is non-statutory guidance and not mandatory it does not place a legal requirement on the City to increase the height of the existing parapets to comply with the current Standard. Our consultants will carry out a technical risk assessment to confirm this conclusion.</p>			

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
	<p>However, compliance with the recommendations of the AECOM report (including on-going monitoring, recording and evaluation of the state of the parapets) will reduce the risk of potential liability in relation to the current state of the parapets while preserving the original metalwork of the Grade II listed structure where possible.</p> <p>As trustee of Bridge House Estates, the City must act in the best interests of the charity, following principles of trustee decision-making developed by the courts. A summary of the City's role as trustee of Bridge House Estates is contained in Appendix 4.</p>			
14. Corporate property implications	No impact			
15. Traffic implications	No impact	<ul style="list-style-type: none"> • Temporary closures of Blackfriars underpass required to install access scaffold • Site access and accommodation to be established from Blackfriars Bridge footway to maintain traffic flow (road and cycle lane) with temporary closures for site set-up 		
16. Sustainability and energy implications	<ul style="list-style-type: none"> • Delaying work could reduce the expected useful life of the asset • Prolonging work would cause extended periods or disruption to road and river users. • No energy implications 			
17. IS implications	N/A			
18. Equality Impact Assessment	No impact			
19. Recommendation	Not recommended	Not recommended	Recommended	Not recommended

	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>	<i>Option 4</i>
20. Next Gateway	N/A	Gateway 5 - Authority to Start Work	Gateway 5 - Authority to Start Work	Gateway 5 - Authority to Start Work
21. Resource requirements to reach next Gateway	N/A	Additional budget of: Consultant Fees: £50,000 Staff Fees: £20,000 Total: £70,000	Additional budget of: Consultant Fees: £50,000 Staff Fees: £20,000 Total: £70,000	Additional budget of: Consultant Fees: £80,000 Staff Fees: £30,000 Total: £110,000

Blackfriars Bridge Refurbishment

Parapet and Maintenance Painting Study

July 2018

Quality information

Prepared by	Checked by	Verified by	Approved by
<hr/>	<hr/>	<hr/>	<hr/>

Revision History

Revision	Revision date	Details	Authorized	Name	Position
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1. Introduction

Blackfriars Bridge was originally built in 1869 carries the A201 as well as a cycle superhighway over the River Thames. The bridge structure is owned by Bridge House Estates and managed by the City of London. The bridge is Grade 2 listed.

The recent General Inspection in January 2018 noted that the parapets are in a poor condition with a large proportion of the parapet balusters cracking in some places. In view of the apparent poor condition of the parapet a test was commissioned which found the parapet to be sufficiently strong for pedestrian loading and as a consequence of the layout of the bridge assessed as sufficient for likely traffic loading. A refurbishment of the existing parapet was decided upon as the most appropriate course of action.

The condition of the paint system is also starting to deteriorate significantly in recent years since the bridge's last maintenance painting circa 2000, particularly on the decorative fascia ribs. In the last painting contract the paint was removed back to bare metal hence it is considered that a top coat will be sufficient for the majority of the bridge.

This report will develop the maintenance planned for the bridge considering constraints from various stakeholders and estimate costs and durations for the works.



Figure 1. Blackfriars Bridge

2. Structural Information

Blackfriars Bridge is a five span, 285m (between abutment faces), steel and wrought iron rib arch structure that crosses the River Thames. The five spans are supported by abutments at the north and south ends and four intermediate piers. The piers and the south abutment are founded on London Clay and the north abutment is founded on Thames Ballast. All 'built-up' metallic sections in the structure are riveted together.

The original structure, which was completed in 1869, was 22.86m wide between parapets. The main structural elements were constructed of wrought iron (with some decorative cast iron elements). The structure, including piers, abutments and foundations, was widened in 1909 by 9.14m with the addition of new steel arches. At the north end of the bridge a new curved approach connecting the Victoria Embankment to the bridge was constructed that cantilevered from the north abutment. This curved approach has since been replaced by a largely self-supporting reinforced concrete structure.

Each span consists of nine wrought iron arch ribs from the original structure and three steel ribs from the structure widening with the exception of the north end span (span 1). Span 1 has eight wrought iron arch ribs and four mild steel ribs. For spans 2-4 the widening process involved taking the original west face rib and moving it 9.14m. The three new steel ribs were then erected between the face rib and the remainder of the original structure. The face rib on span 1 was not able to be retained as it did not have the strength to carry the additional loads from the new curved approach span. A steel rib was erected in its place.

Arch Ribs

The flanges of the wrought iron main ribs comprise two plates 610mm wide with a total thickness of 38.1mm. The web plate varies in height and is 22.2mm thick. Pairs of 102x102x12.7mm angles connect the web plate to the top and bottom flanges.

The flanges of the newer steel ribs consist of two plates 610mm wide with a total thickness of 44.5mm. The web plate is similar to the wrought iron webs but the angle sections are 114x114x19mm thick.

All the ribs have 152x102x12.7mm T-section transverse stiffeners at approximately 1.676m centres.



Figure 2. View of the underside of the bridge

Spandrels

On top of each end of the main arch ribs are lattice spandrels. The lattice spandrels on top of the outside girders are constructed in cast iron with the large stiffened C-section members comprising the individual struts. The internal steel and wrought iron spandrel struts are 127x76mm angle sections 7.9mm thick. The struts are inclined and spaced at approximately 0.95m centres.

The tops of the spandrel struts are riveted to the stem of the top chord T section which supports the deck structure. This is made up of a 508x9.5mm thick web plate, 203x12.7mm thick flange plate and two 101x101x12.7mm thick angle cleats.

Transverse Members

Transverse bracing members exist between the main ribs. The transverse bracing members are located approximately every third transverse web stiffener in the main ribs and are connected to the webs of the main ribs.

Transverse deck girders sit on top of the spandrel top chord or are connected directly to the web of the main arches in the centre of the spans. The girders are spaced at an average of 1m when on top of the spandrel top chord. Where the girders are riveted directly into the main arch ribs they generally occur at the same location as the transverse web stiffeners.



Figure 3. Braces between arch ribs

Parapets

The parapet is made up of hollow cast iron box rails that are supported on and bolted through hollow balusters. The balusters are set on a metal box plinth that is filled with concrete. Tie rods connect the rails to the concrete plinth through the hollow balusters. The parapet is approximately 1m high. The parapets are discontinuous across the piers, where there is an allowance for movement.

3. Recent Inspection Findings

Parapets

The recent inspection of Blackfriars Bridge found the parapets to generally be in poor condition.

Several cracks along the parapet were noted having propagated from the corners of the base of the balusters and this has caused section loss on the baluster in a number of locations. This deterioration is causing rust staining along the bridge which is highlighting the cracks and damage on some balusters. The vertical casting joints are separating in some instances and are showing signs of rusting. The balusters are also pitting in some locations along the bridge.

Several of the plates at the interface of the parapets and the piers are missing or displaced.



Figure 4. Example of large crack in the corner of baluster base that is required to be filled with epoxy filler.



Figure 5. Example of the rusting staining of the vertical casting joints



Figure 6. A missing plate connecting the parapet to the pier



Figure 7. An example of section loss at the base of the baluster

Underside

The outer cast iron spandrels are rusting in places and require full cleaning and painting. It can also be seen from the picture below that a number of the decorative castings that are attached at the node points of the lattice infill section are damaged or missing.

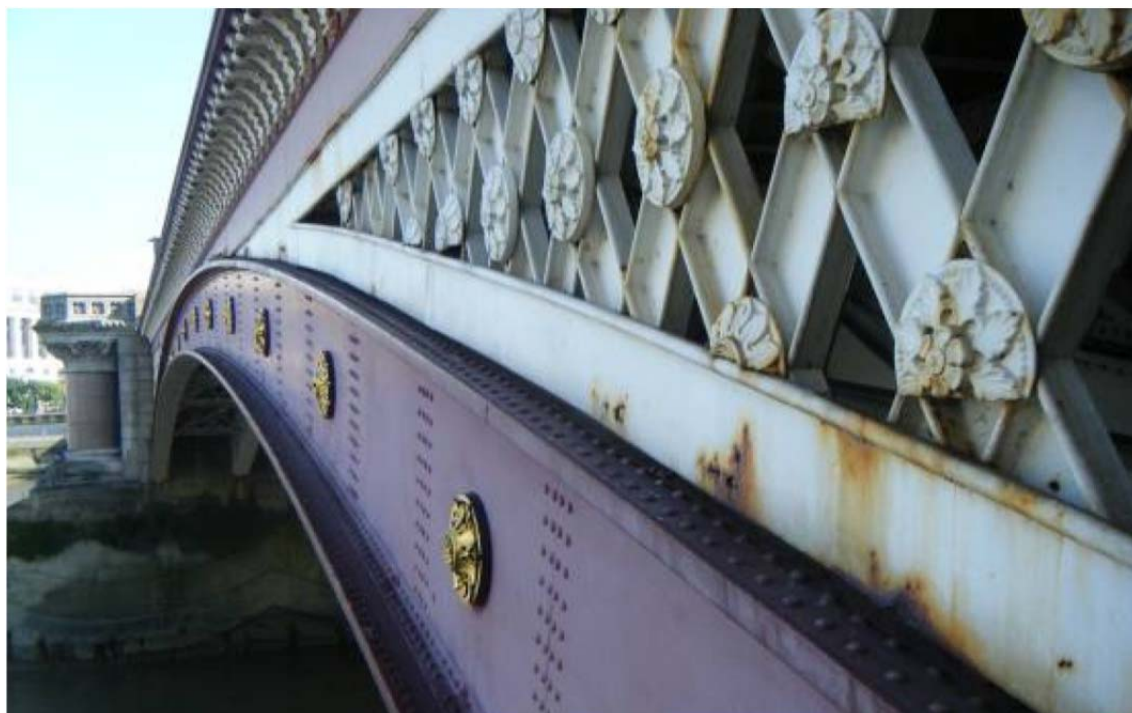


Figure 8. Rust staining and damage on spandrel rib

The condition of the paint throughout the soffit of the arches is quite good. It is believed that most of the paint is in good enough condition to be cleaned and over coated as opposed to being taken back to bare metal and 3 coats applied. It is likely that 5-10% of the soffit where rust is visible will need a full preparation and paint system.

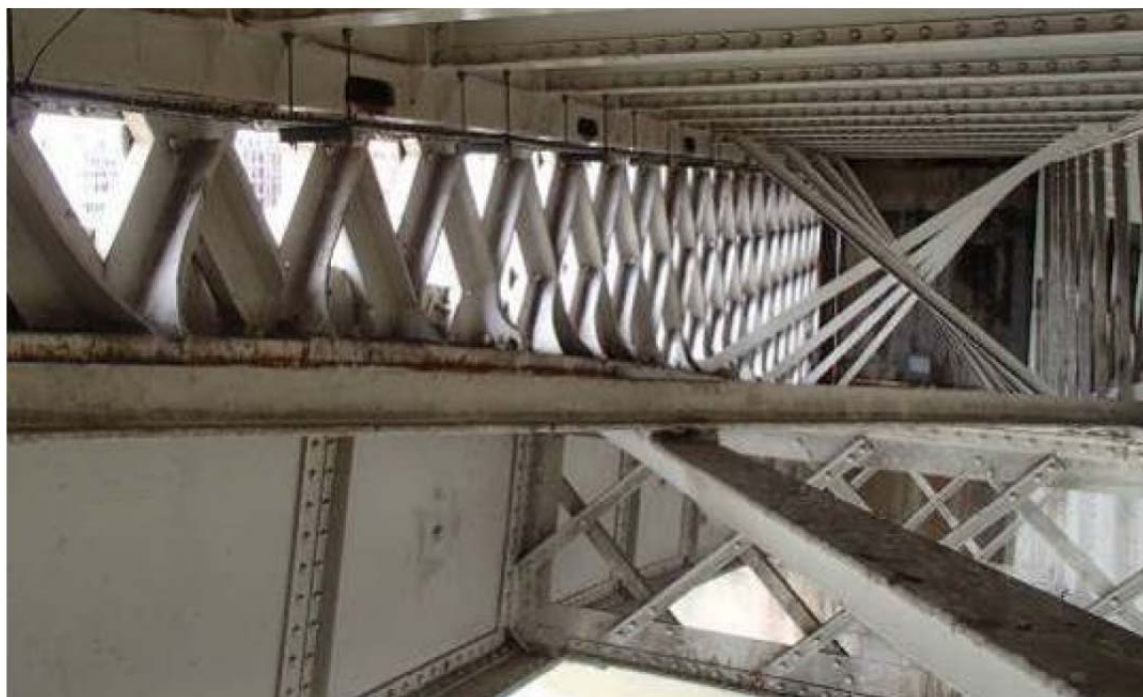


Figure 9. Condition of structure on the underside

4. Parapet Load Test

In 2018 the City of London commissioned AECOM to arrange a test of the parapet to determine whether it was possible to retain the current parapet or if strengthening would be required. The test involved constructing a frame to apply a static horizontal load to a section of the parapet. The loads were applied at handrail level and baluster level

The test found that the parapet is satisfactory under ULS and SLS and so as a result does not need strengthening or replacing. However, it was recommended that the parapet be repainted and localised cracks be repaired to prolong the life of the parapet.



Figure 10. Parapet test

5. Parapet Repairs

In preparation for the Tideway works a new staircase was installed on the eastern side of span 1 recently. This involved the removal and repair of a section of the parapet. We have used knowledge gained of this work to inform our estimate of the works required to refurbish the parapet on the rest of the bridge, while it is appreciated there will be some economy of scale there is a limited number of specialist companies who will be able to carry out these works to the required standard.



Figure 111. Parapet Repairs



Figure 12. Parapet Reconstruction

6. Stake Holders

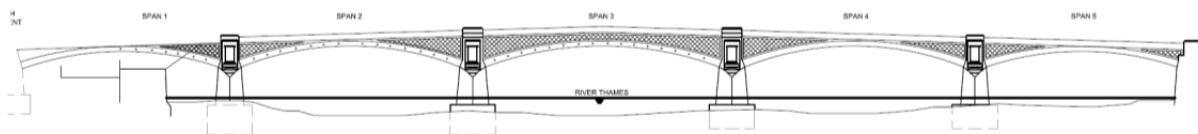


Figure13. Bridge Elevation

Due to the pivotal role played by Blackfriars bridge in the London transport system there are numerous stake holders to consider whose buy in is likely to be needed to refurbish the bridge.

In addition to the City of London, the relevant stakeholders are:

Transport for London (TfL) – These are the highway authority for both the bridge and the underpass which is under Span 1.

Port of London Authority (PLA) – The river authority who manage river traffic and are responsible for navigational safety for river users. The restriction of navigation beneath the bridge will need to gain their approval.

Network Rail (NR)– Owners of the adjacent bridge which is sufficiently close that any navigational restrictions on the road bridge needs to be replicated on the rail bridge.

Thames Tideway (TT)– The construction of a new sewer running beneath the Thames is happening over the next few years. A significant element of the works is centred around Blackfriars where there is a new foreshore being constructed. As a result of the project there is anticipated to be a significant increase in river traffic, and span 2 of Blackfriars Bridge is to be closed to river traffic for the duration of the construction.

Environment Agency (EA) - Any works over the River Thames where there is potential to affect the river requires the approval of the Environment Agency

7. Programme Constraints

In an ideal situation the painting of the bridge could be phased so that painters and scaffolders were able to work in a complimentary manner whereby access was readily available to all areas required by the painters and scaffolders were constantly occupied either installing or stripping scaffolding. This was achieved during the previous painting contract of Southwark and Tower Bridges by swapping work fronts between the two structures, enabling the scaffolders to prepare/strip one structure while the other was being painted. We do not have that possibility for this project.

Of the five spans of the bridge;

Span 1 is partly over water (although not a navigable span) and partly over road, namely the Blackfriars Underpass. It is also over a section of the embankment which for the next few years is being used as a site establishment for the Thames Tideway Project. To access the underside of this span agreement will need to be sought from TfL and Tideway. Part of the Tideway works will impact the painting of the spandrel because there is a new staircase due to be built alongside the bridge.

Span 2 is currently closed to river traffic for the safety of workers on the Tideway construction site.

Spans 3 and 4 are the main navigable spans.

Span 5 is not considered navigable by the PLA although small vessels can use it.

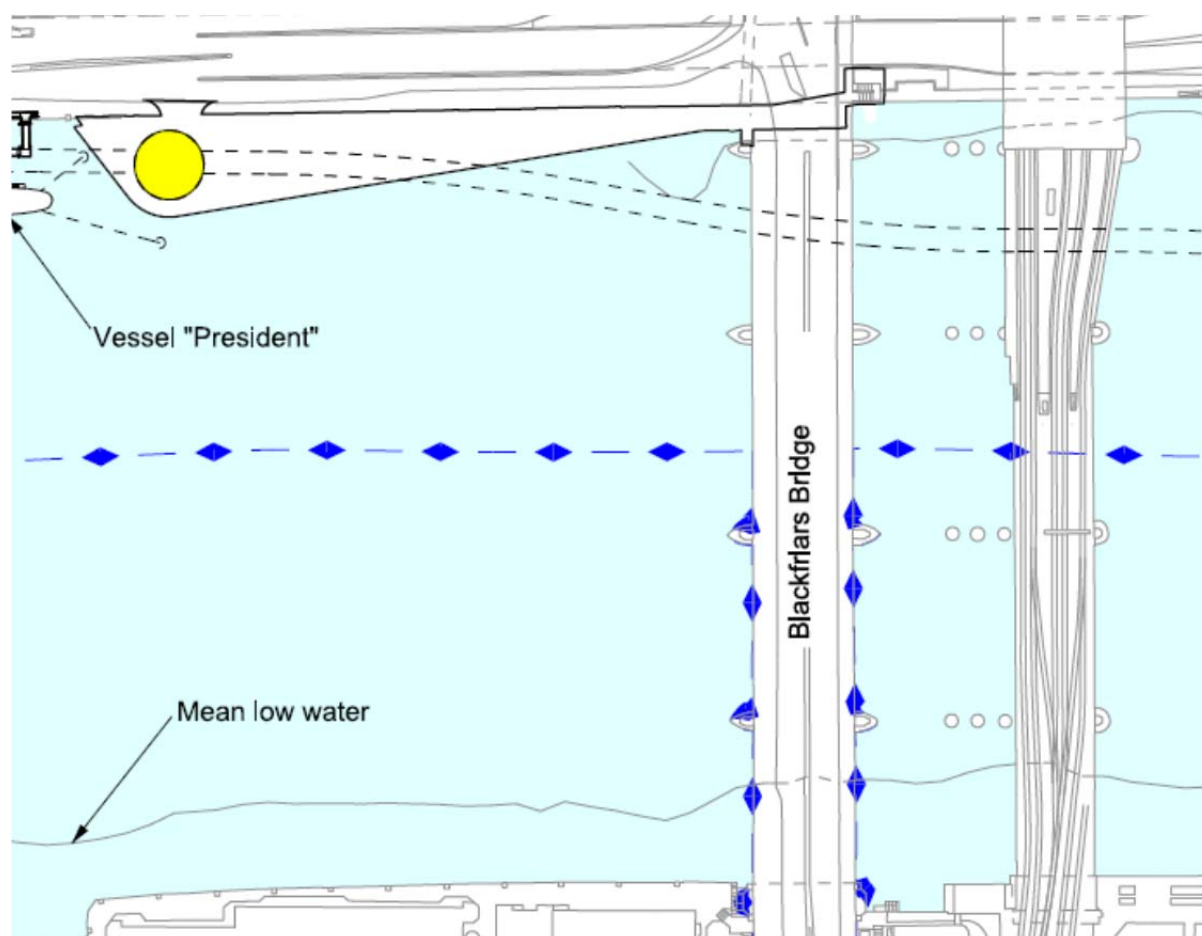


Figure 124. Plan of River bed Blackfriars Road and Rail Bridge

Any restriction to road traffic or alteration of the carriageway or footway will require approval from Transport for London (TfL) and any restriction to traffic on the River Thames would require the approval from The Port of London Authority (PLA) before going ahead.

PLA requires at least two of the arches to be open to traffic along the River Thames during the day. This creates a significant challenge because only 3 of the arches (arches 2, 3 and 4) are navigable to traffic along the Thames but arch 2 is currently blocked by Thames Tideway. PLA will allow river traffic to be restricted to a single span over night and at a cost of approximately £2000 an evening.

PLA have currently stated they will only allow work on the parapets of navigable arches at night, whether there is a crash deck in place or not, although in discussions there was an indication that working over an open span may be possible if a safe method could be demonstrated.

If this cannot be agreed with the PLA the current programme for the Tideway works at Blackfriars extends until April 2023.

8. Access and Site Establishment

A traditional scaffold that would be used for carrying out the painting and refurbishment of a bridge such as this is shown in Appendix B. However this would require the closure of a span to river traffic. This is a possibility to paint and refurbish Spans 2 and 5.

Span 1 would be best considered in sections. The section over the road could be scaffolded without causing significant disruption. The section over the Thames path could potentially be accessed using localised towers for the underside. The parapet and spandrel will be affected by the Tideway works and will need to be coordinated with the Tideway contractor.

In order to paint spans 3 and 4 during the next two years agreement will need to be reached with the PLA on a safe system of work over open river spans. This should be possible, it is regularly done over working railway lines, although it increases the cost of the works as the scaffold will need to be built at night while the span is closed to river traffic. The scaffold design will also need to be developed to not protrude (**non-protruding**) beneath the soffit of the arches. This will require the lowest parts of the span, typically the arch rib undersides) to be painted using roped access or underbridge unit because they will not be accessible from the scaffold.

It may be possible to agree with the PLA to extend the scaffolding below the soffit by 250-300mm in

With the northern foreshore occupied by the Tideway works there is very little land available for a Contractor to house their welfare units and store the necessary materials. To overcome this we would expect the Contractor to build an enclosure around one of the footways as shown in Figure 13 and house their welfare units and materials at the higher level.

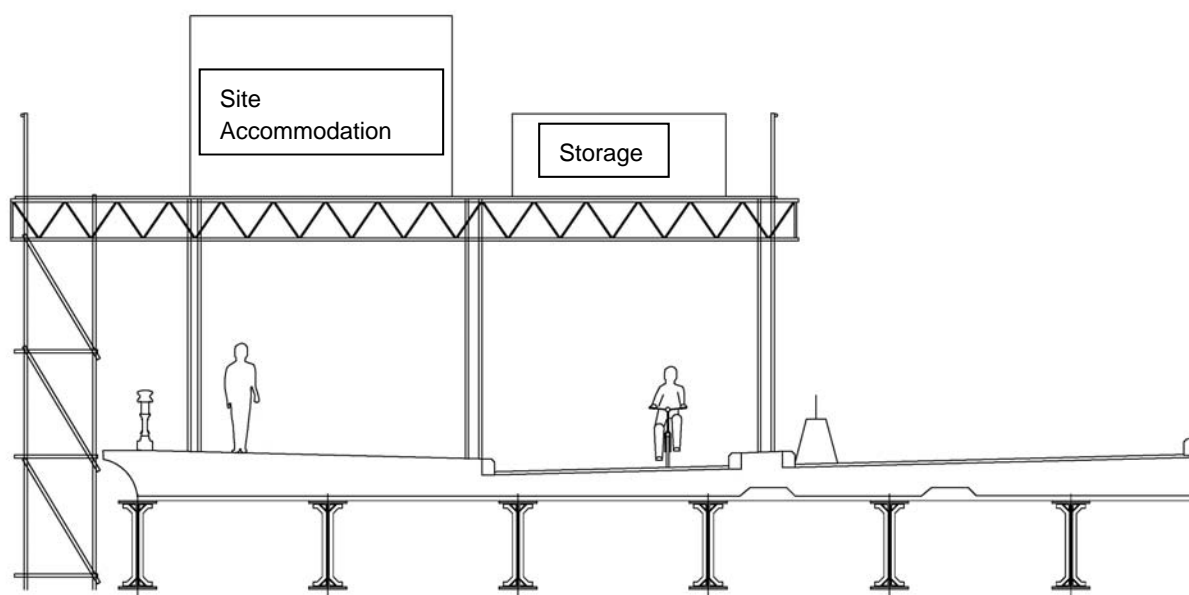


Figure 135. Possible high level office and store arrangement

The alternative option would be to moor a floating welfare setup in one of the closed spans, however the risks and costs associated with this option make the high level solution more attractive.

9. Refurbishment Options

We have presented below the options available to refurbish the bridge. As well as a 'Do Nothing' option we have considered a bare minimum in which the bridge is painted but the parapet is only repaired using filler and painted. For costing purposes we have assumed the entire bridge is painted with an estimated 5% of the surface area requiring preparation back to bare metal and the application of a full 3 coat system.

Our costs for the parapet refurbishment are based on the figures received from Newton Forge who carried out the repair to the section of the parapet repaired during the construction of the new stair case on the north east corner of the bridge. They removed and repaired/replaced a 12m section of the parapet at the north east corner.

The Preliminaries include site accommodation and supervision costs as well as costs such as a safety boat. The scaffolding costs are incorporated in the painting costs. The duration of the works, assuming scaffolding is carried out at night on spans 3 and 4 with day time painting, is anticipated as 12 months in total. It is assumed for this that where scaffolding repairs are included these can be carried out concurrently with the painting.



Figure 146. Current rust staining on the bridge

Once a casting specialist has been employed for the parapet it may be decided to extend the repairs to some of the other damaged cast iron elements such as those shown in Figure 16. A nominal sum has been included in the options wherein the parapet is being repaired for further unspecified repairs.

9.1 Option 1 – Do Nothing

This option is the cheapest option in the short term with no work required and would cause the least disturbance to the large number of tourists and commuters who use the bridge. The load test demonstrated the condition of the parapet is currently satisfactory structurally, however monitoring the deterioration of the parapets would need to take place to ensure safety. The recommended maintenance life of the paint system has been exceeded which can be seen in the rust staining appearing on the bridge. This will continue to worsen over time which will eventually impact the load capacity of the structure as well as impacting the aesthetics of this landmark bridge if it goes untreated.

Some form of refurbishment will be required in the future if it does not occur now, this could lead to a more expensive solution in the future.

We have not assigned a cost to this option because the monitoring of its deterioration will be part of routine inspections that occur currently on bridge.



Figure 157. Current rust staining on the bridge

9.2 Option 2 – Paint only

If the necessary repairs to the parapet only became apparent once the contract was let then the parapet would be patched in a non-structural way using fillers and painted over. This would leave the contract as a purely preparation and paint contract including providing access.

The downside of this approach is that the parapet paint system will start to break down in the areas where defects have been filled and it would be difficult to enforce any warranty on the paint system.

The cost estimate below is based on a conventional scaffold being possible on 3 spans and a non-protruding scaffold which would not restrict the passage of river craft being agreed on the two navigation spans. The scaffold would need to be installed at night during span closures.

Element	No. of Units	Cost Per Unit (£)	Total Cost (£)
Prelims			1,000,000
Repaint deck and parapet (standard scaffold)	3	850,000	2,550,000
Repaint deck and parapet (non-protruding scaffold)	2	1,100,000	2,200,000
		Total	5,750,000

9.3 Option 3 – Minimum repair parapet, continuous work

Due to Blackfriars Bridge's location and prominence it is important its appearance maintains a high level. As part of this option the major defects in the parapet will be repaired or replaced. This option includes completely replacing some of the balusters columns due to section loss or large cracks. As a Grade II structure the replaced baluster columns will need to replicate the original balusters. This option would also include the larger cracks being filled with an epoxy filler to prevent further corrosion and deterioration of the parapet. Before the cracks are filled, the cracks will be cleaned by being grit blasted. The connecting plates between the parapet and the piers will be replaced where cracked or missing. The longitudinal cracks in the mortar where the parapet meets the footway will be dug out and replaced. These works will be done before the bridge is repainted.

The parapet repairs do require panels (circa 4m long) to be disassembled to undertake the repairs which may influence the threshold at which a repair is carried out. Once a panel is apart a baluster which was considered suitable to be simply filled and repainted may be replaced because it is easily accessible, however the wholesale deconstruction of the parapet would be avoided.

In addition to patch repairs this option would address the issue of the rust staining of the majority of the baluster posts. Not only would it remove the staining from the parapet but it would prevent staining as the minor cracks causing staining of the parapet would be sealed by the paint. The pitting found on a number of the baluster posts would also be covered by the protective paint.

The bridge was last repainted in 2000 with some sections of the bridge repainted in 2002. The lifespan of a modern paint systems is typically 12-15 years and since the current system is at the end of this lifespan it is expected that it will begin to deteriorate further. The process of re-painting the parapet and deck involves removing the existing paint system by grit blasting before the reapplication of paint system.

Access to outer side of the parapet required for maintenance and repainting of the parapet will be achieved using a suspended scaffold arrangement and an enclosure to contain the dust and grit produced..

Element	No. of Units	Cost Per Unit (£)	Total Cost (£)
Prelims			1,250,000
Replace baluster post	23 panels	45,000	1,035,000
Fill gaps in parapet	20		
Repaint deck and parapet (standard scaffold)	3	850,000	2,550,000
Repaint deck and parapet (non-protruding scaffold)	2	1,100,000	2,200,000
Replace connecting plate	9	10,000	90,000
Replace parapet mortar base	400m	20	10,000
Sundry cast iron repairs			100,000
		Total	7,235,000

9.4 Option 4 – Replace all balusters, full repaint

This option proposes replacing all the balusters on the parapet as the current balusters have numerous cracks and defects. The top of the parapet is in a good condition apart from a few spots of rust where the paint has come off as the recent inspection shows. As a Grade II listed structure the balusters will need to be replaced with a replica of the balusters on the current parapet. Though this option is the most expensive it is likely it will provide economies in the future by minimising the amount of maintenance required and will provide a safer and more durable option. To reduce time spent painting the bridge on site the balusters could be painted off-site.

As shown in Appendix C the parapet can be detached in sections and the balusters replaced easily. The connecting plates between the parapet and the piers will be replaced where cracked and missing. The longitudinal cracks in the mortar where the parapet meets the footway will be dug out and replaced. These works will be done before the bridge is repainted.

A possible complication with this option would be whether it would be considered necessary to reintroduce a parapet that would comply with current standards as so much is being replaced. This would be extremely difficult to achieve without significant hidden reinforcement and would probably rule out this option.

Element	No. of Units	Cost Per Unit (£)	Total Cost (£)
Prelims			1,500,000
Replace all baluster posts	100	40,000	4,000,000
Repaint deck and parapet (standard scaffold)	3	850,000	2,550,000
Repaint deck and parapet (non-protruding scaffold)	2	1,100,000	2,200,000
Replace connecting plate	9	10,000	90,000
Replace parapet mortar base	400m	20	10,000
Sundry cast iron repairs			100,000
		Total	10,450,000

10. Recommendations

The option of doing nothing is not really a consideration given the bridge's location and significance to the City of London as well as its role as one of the main transport arteries for the City. The appearance of the bridge has already been the source of comments from significant figures in the City. It is very unfortunate that the painting of the structure coincides with the largest project undertaken on the Thames in living memory.

The option of carrying out painting of the parapets with simple superficial covering of the cracks is a short term solution to the appearance of the bridge however will not be economical in the longer term because the parapet condition will worsen in many situations and require repainting in less than the expected 15 years offered by a modern paint system.. When this is considered in tandem with the difficulties associated with working in central London and over the river this cannot present an appropriate solution.

Once accepting that repairs to the parapet are necessary then the choice is whether to carry out a focussed repair on the balusters, that are unlikely to last the 15 years or more, or whether to go for a wholesale replacement. Given the Grade II listed status of the structure there will be resistance from the planners to the replacement of any original fabric of the bridge that does not require replacement, and the replacement of sections as a precaution against future weathering is unlikely to gain approval even though the provision of access may make this an attractive option. We therefore recommend the option where only unmaintainable elements are replaced, Option 3.

The final cost estimate for this can be developed further once the various stakeholders and their access restrictions have been fully explored and agreed.

Appendix A Risk Register

Appendix B Scaffolding used for Southwark Bridge

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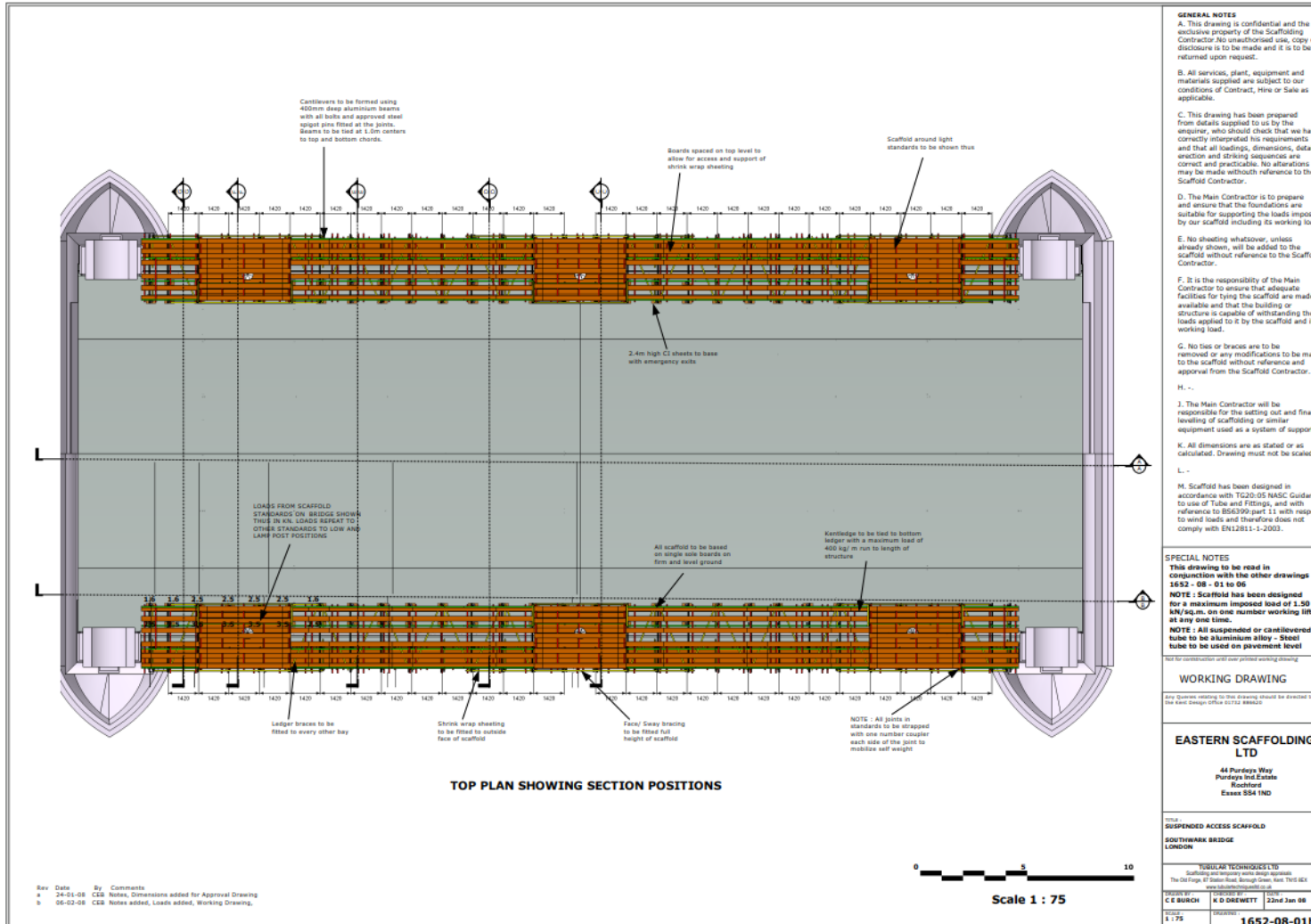


Figure 16. Scaffolding used on Southwark Bridge [1/6]

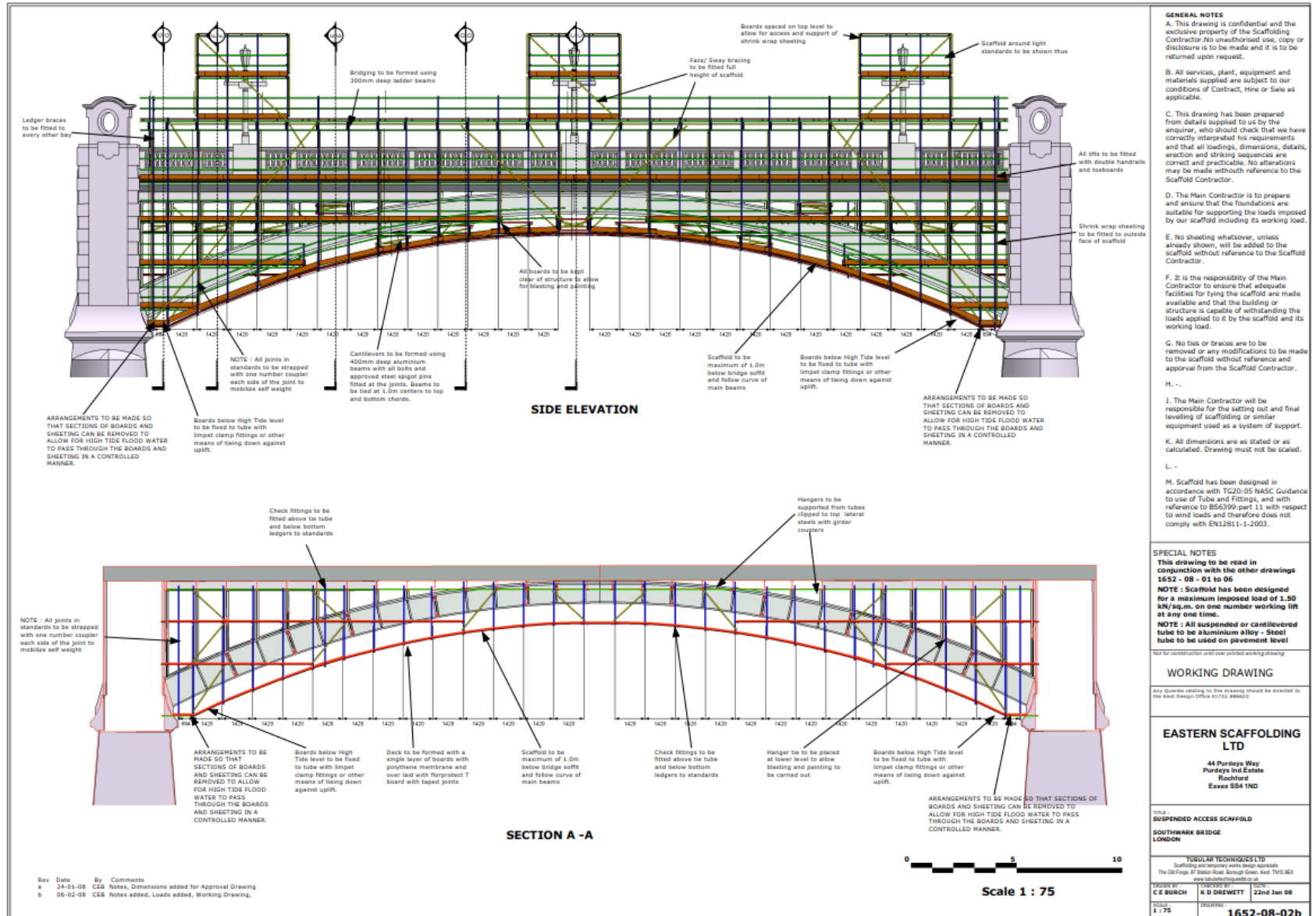


Figure 17. Scaffolding used on Southwark Bridge [2/6]

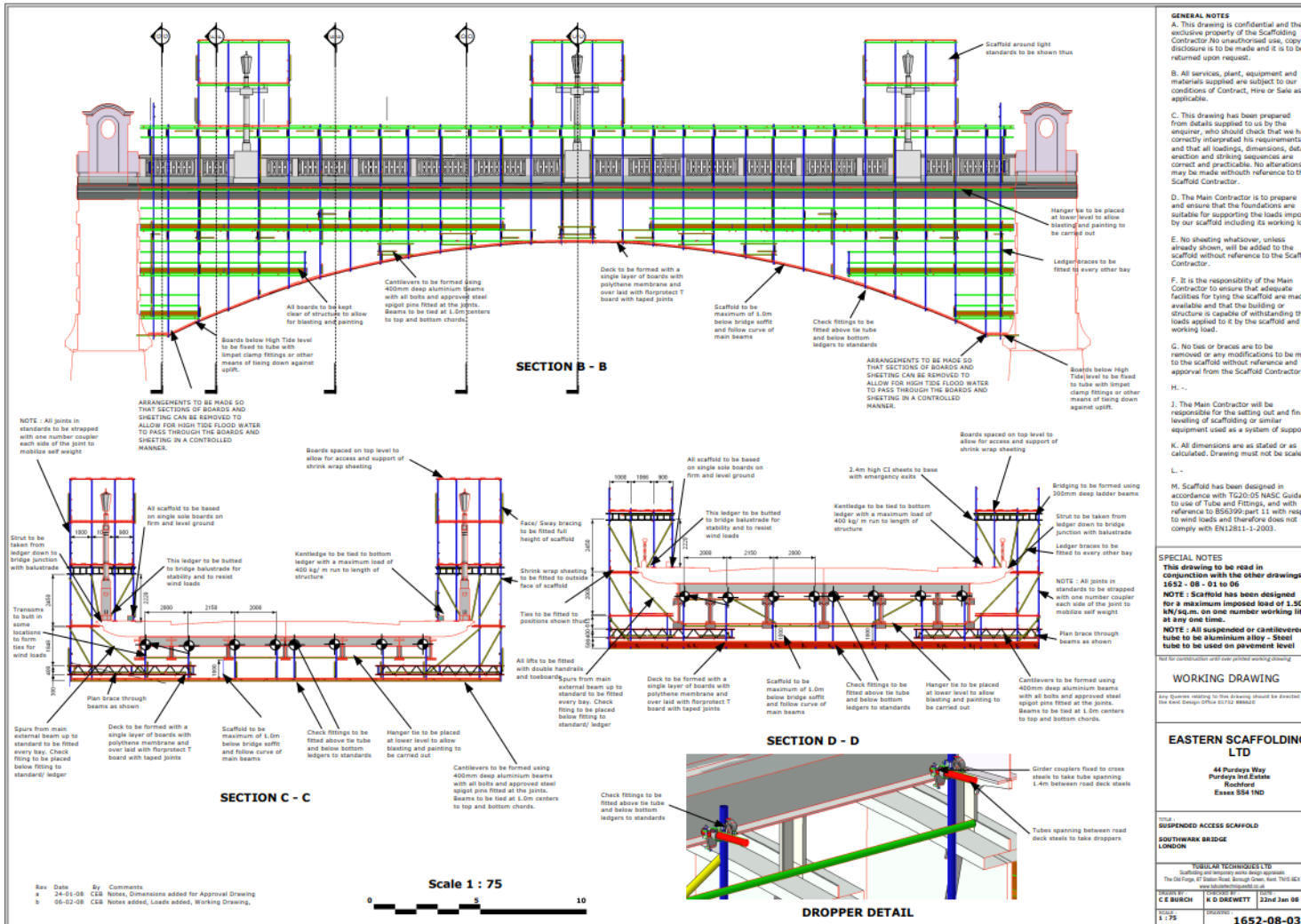


Figure 18. Scaffolding used on Southwark Bridge [3/6]

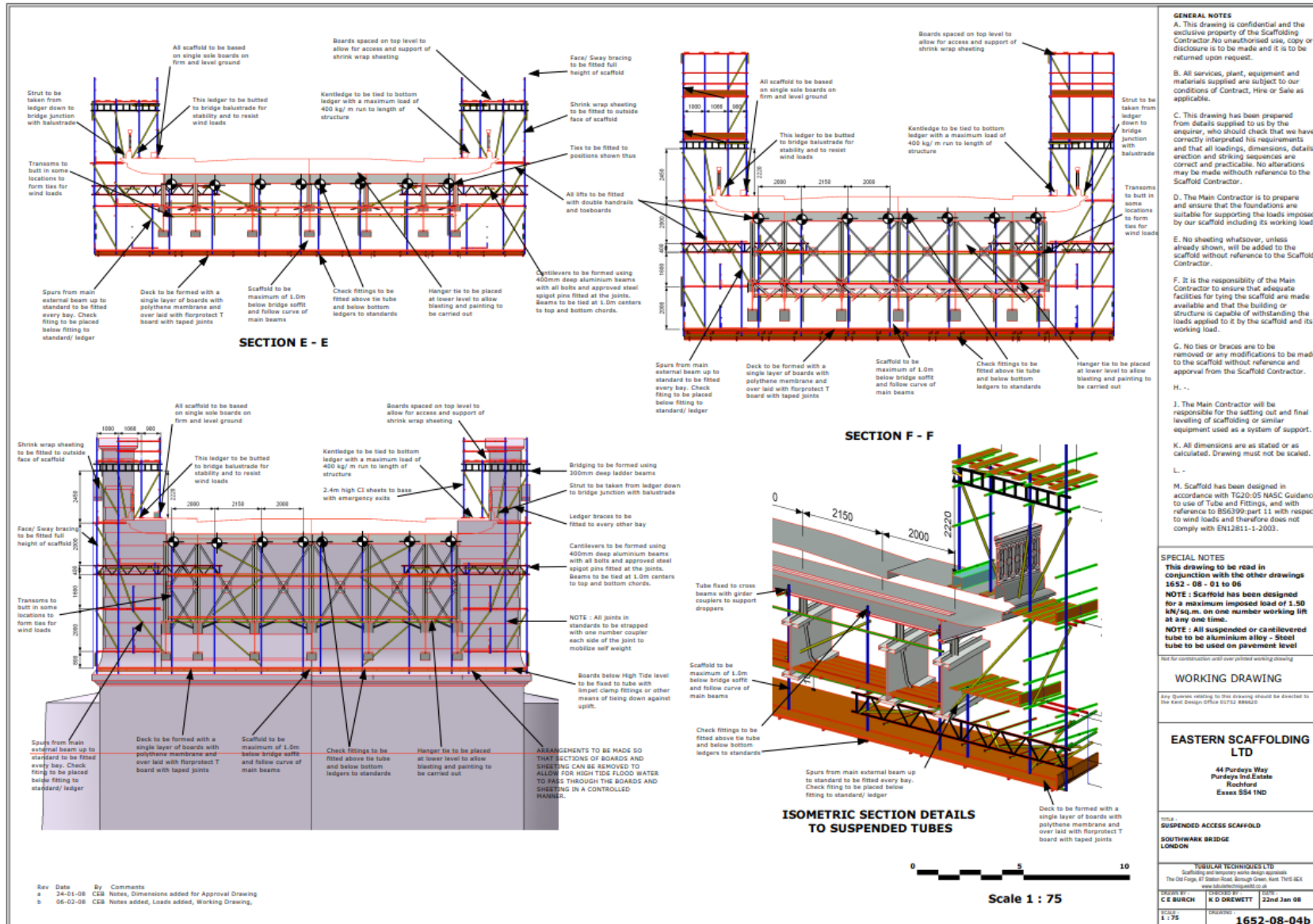


Figure 19. Scaffolding used on Southwark Bridge [4/6]

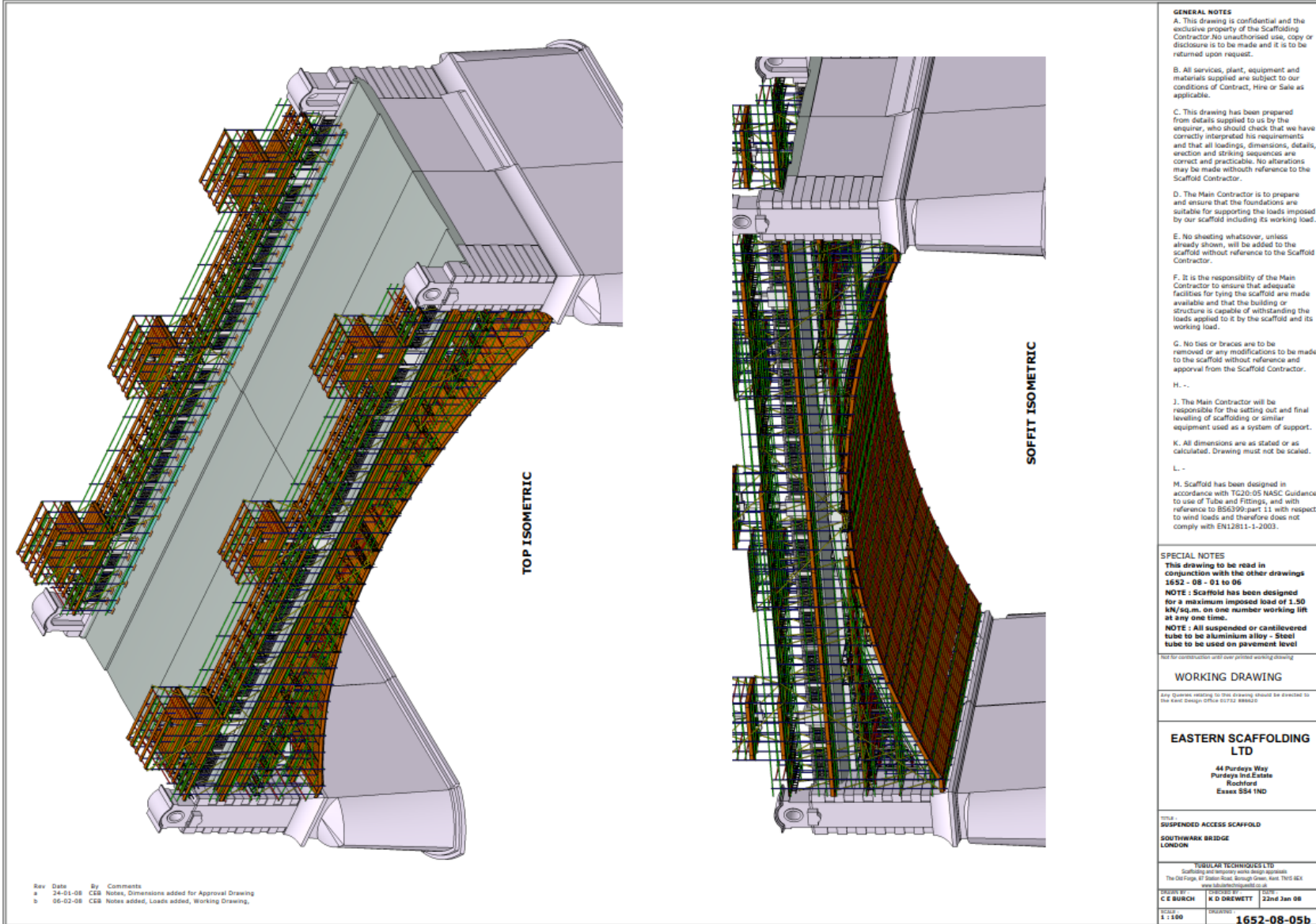


Figure 20. Scaffolding used on Southwark Bridge [5/6]

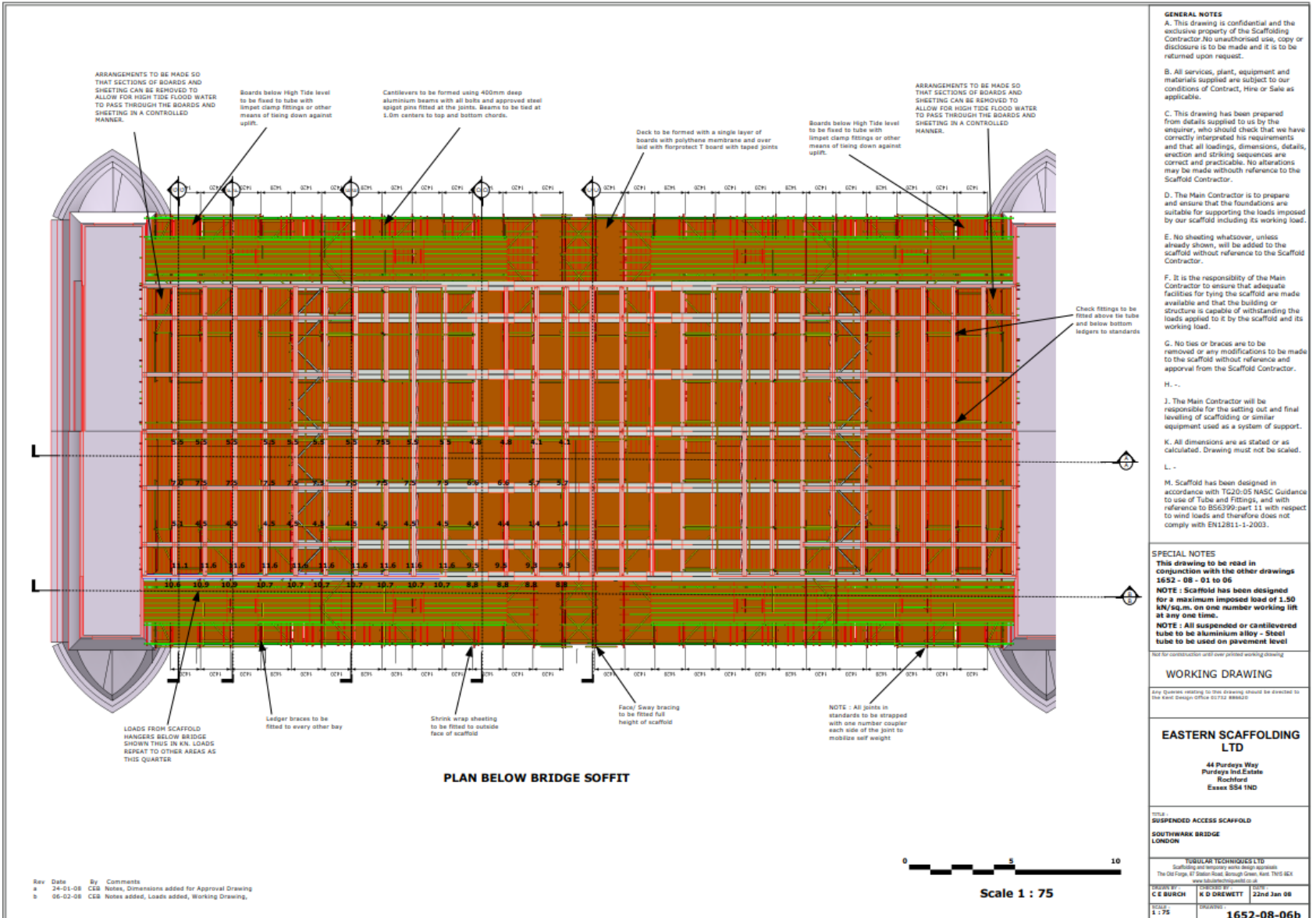
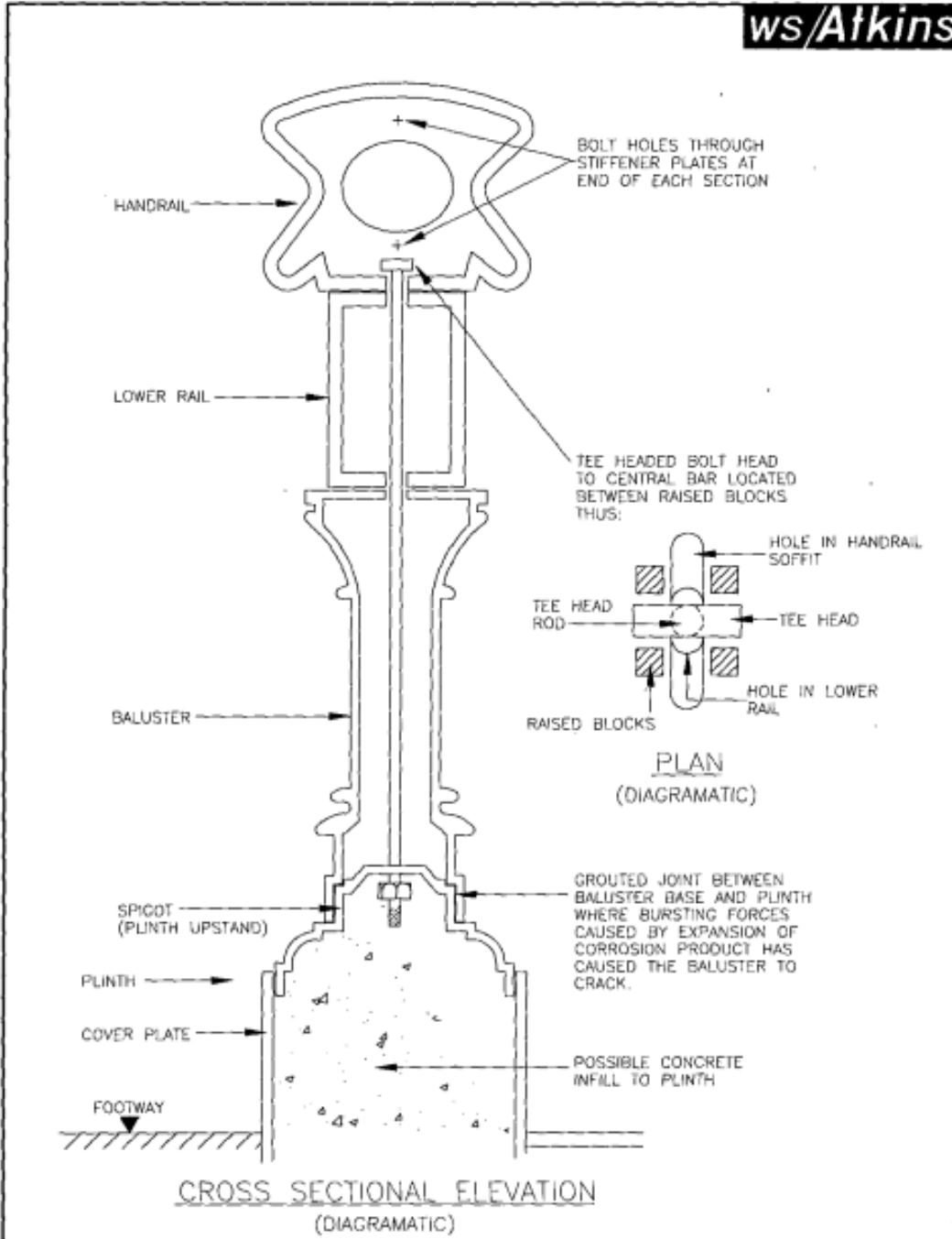


Figure 21. Scaffolding used on Southwark Bridge [6/6]

Appendix C As built drawings



WS Atkins Consultants Ltd. City of London Division Boston House 140 London Wall LONDON EC2Y 5JS Telephone: 0171 796 0000 Fax: 0171 796 0066	BLACKFRIARS BRIDGE PARAPETS EXISTING CONSTRUCTION	No. (5/A/0275/SK3)
		Date AUG '99
		Designed
		Drawn SEC
Client: Corporation of London	Scale NTS	Checked

Figure 22. Cross section parapet

Appendix D Baluster Major Defects

City of London: Projects Procedure Corporate Risks Register

Project Name: **Blackfriars Bridge Refurbishment**

Overall risk rating

Unique project identifier: **72800019**

Costed risk carried

Amber
£4,045,000.00

General classification										Mitigation actions					Ownership & Action					
Risk ID	Category	Description of the Risk	Risk Impact Description	Likelihood Classification	Impact Classification	Costed impact (£)	Risk score	Confidence in the estimation	Mitigating actions	Mitigation cost (£)	Likelihood Classification	Impact Classification	Costed impact after mitigation (£)	Mitigated Risk score	Date raised	Risk owner (Department/ External)	Risk owner (Officer/ External)	Action dependencies	Date Closed	Comment(s)
ID Number (Officer discretion on how it is created)	(1) Service Delivery/ Performance (2) Financial (3) Reputation (4) Legal/ Statutory (5) Safety/ Health (6) Objectives.	The Officers specific description of the risk to the project (and potentially to the Corporation as a whole).	if the risk is realised and becomes an issue needing to be resolved. This could describe a mix of time and milestone movement. Officer hours, change to scope, quality, reputation or financial cost.	Likelihood Classification the Officers judgment, previous experience or advice taken, of the risk occurring. On a 4 point scale from Rare to Likely.	of the risk should it be realised, measured on a 4-point scale from Minor to Extreme (using a Health and safety risk example below as a demonstration of how this may look)	the potential financial cost to resolve the risk in full should it occur. Estimated by the Officers judgment, from experience or advice taken. Some risks such as 'reputational damage' may be unquantifiable.	calculated from the grid using (E) and (F)	Not all risk estimations are comparable, some project elements may be more radical or novel with little basis for comparison within the Corporation. Officers have suggested noting this for Members and Senior Officers using a confidence mechanism, where risk owner give a confidence level in the risk item's description. (This would be expected to increase as the project progresses and investigations and surveys feed into the planning). Likewise the use of Quantity Surveyors early on in reviewing risk register elements should increase the confidence in the assessments made.	The actions or approach which could be taken to reduce or clarify the likelihood of a risk occurring or reduce/ change the severity of its impact should it occur. Mitigation could be to spend fees looking for asbestos or an early groundwork surveys, the results of which will further clarify the risks and could front-end particular actions in the project plan to prevent later expensive delays.	The cost of the risk mitigation works. Not all mitigation activities will have a cost associated with it.	Likelihood Classification the Officers judgment, previous experience or advice taken, of the risk occurring. On a 4 point scale from Rare to Likely.	of the risk should it be realised, measured on a 4-point scale from Minor to Extreme (using a Health and safety risk example below as a demonstration of how this may look)	The revised 'costed impact' of a risk if realised following the mitigation activities.	calculated from the grid using (E) and (F)			The stakeholder who would be responsible for the practical action to monitor and rectify the risk should it become an issue. In practice this is not always the project manager.	If there are any dependencies required to enable risk owner to take action	If action no longer relevant	
R1	(1) Service Delivery/ Performance	Access issues leading to the inability to operate continuously	PLA constraints, including Tideway enforcement	Likely	Extreme	£250,000.00	32		Early discussion and sequencing of works. Phasing contract works	£0.00	Likely	Extreme	£250,000.00	32	18/06/2018	DBE				Increase in prelims and interruption of works
R2	(1) Service Delivery/ Performance	Access issues leading to the inability to operate continuously	Tideway	Likely	Serious	As above	8		Early discussion and sequencing of works. Phasing contract works	£0.00	Likely	Serious	As above	8	18/06/2018	DBE				Increase in prelims and interruption of works
R3	(1) Service Delivery/ Performance	Access issues leading to the inability to operate continuously	TfL	Possible	Serious	As above	6		Early discussion and sequencing of works. Phasing contract works	£0.00	Possible	Serious	As above	6	18/06/2018	DBE				Increase in prelims and interruption of works
R4	(1) Service Delivery/ Performance	Access issues leading to the inability to operate continuously	Illuminated River	Unlikely	Serious	As above	4		Early discussion and sequencing of works. Phasing contract works	£0.00	Unlikely	Serious	As above	4	18/06/2018	DBE				Increase in prelims and interruption of works
R5	(1) Service Delivery/ Performance	Access issues leading to the inability to operate continuously	Network Rail	Unlikely	Major	As above	8		Early engagement	£0.00	Rare	Major	As above	4	18/06/2018	DBE				Increase in prelims and interruption of works
R6	(1) Service Delivery/ Performance	No suitable Location of site compound	Cost and programme.	Likely	Serious	Cost included in estimate	8		discussions with contractor / City Surveyor	£0.00	Likely	Serious	£0.00	8	18/06/2018	DBE				The option to build a high level compound has been allowed for.
R7	(2) Financial	TfL charge lane rental	Cost and programme.	Possible	Serious	£120,000.00	6		Review Blackfriars Bridge Act	£0.00	Possible	Serious	£120,000.00	6	18/06/2018	DBE				£800 per day is current cost. Initial estimate based on 150 days.
R8	(1) Service Delivery/ Performance	Events	LMS, river events	Likely	Minor	£20,000.00	4		forward programming	£0.00	Possible	Minor	£0.00	3	18/06/2018	DBE				Possible additional prelims
R9	(1) Service Delivery/ Performance	HVM Barriers	Access, impact on works, removal and renewal.	Likely	Major	£10,000.00	16		liaison with MET police	£0.00	Likely	Major	£0.00	16	18/06/2018	DBE				High level compound reduces impact of these.
R10	(2) Financial	Extent of know cast iron defects	Cost and programme.	Possible	Serious	£250,000.00	6		increase level of survey, conservative allowance for repairs	£0.00	Possible	Minor	£125,000.00	3	18/06/2018	DBE				When panels are disassembled/blasted there could be further damage uncovered.
R11	(2) Financial	Unknown defects	Cost and programme.	Possible	Major	£200,000.00	12		Inspection information	£0.00	Possible	Major	£50,000.00	12	18/06/2018	DBE				Regular inspections have been undertaken. Many defects decorative rather than necessary.
R12	(1) Service Delivery/ Performance	Finding a suitable contractor for competitive tender	cost and Value for money	Possible	Serious	£0.00	6		Early discussion. Phasing contract works and procurement strategy	£0.00	Possible	Minor	£0.00	3	18/06/2018	DBE				OJEU process likely to be necessary
R13	(1) Service Delivery/ Performance	EU Tender	programme	Possible	Major	£25,000.00	12		procurement strategy. Accurate estimating	£0.00	Possible	Major	£25,000.00	12	18/06/2018	DBE				OJEU process likely to be necessary, greater cost for tendering
R14	(4) Legal/ Statutory	Not gaining Third Party Approvals	LBC and others	Unlikely	Major	£10,000.00	8		early engagement with approving bodies	£0.00	Rare	Major	£5,000.00	4	18/06/2018	DBE				
R15	(5) Safety/ Health	site security/trespass	open site.	Possible	Serious	£10,000.00	6		ECI. Early drafting of Construction phase plan	£0.00	Possible	Minor	£10,000.00	3	18/06/2018	Contractor				
R16	(5) Safety/ Health	Terrorism	could provide new access opportunities for terrorists	Unlikely	Extreme	Included above	16		ensure existing mitigation is maintained. Liaison with police forces.	£0.00	Unlikely	Extreme	£0.00	16	18/06/2018	DBE				
R17	(5) Safety/ Health	Asbestos / other contaminants found	H&S, cost and programme	Rare	Major	£250,000.00	4		increase level of survey.	£0.00	Rare	Major	£15,000.00	4	18/06/2018	DBE				Bridge has been taken back to bare metal previously. No record of harmful materials still present. Asbestos survey could be carried out in advance
R18	(4) Legal/ Statutory	AECOM contract finishing	project programme goes beyond current AECOM commission	Likely	Serious	£50,000.00	8		review appointment / extend contract.	£0.00	Rare	Minor	£0.00	1	18/06/2018	DBE				
R19	(5) Safety/ Health	Utility strike	H&S, cost and programme	Unlikely	Major	£150,000.00	8		increase level of survey. Specifications	£0.00	Rare	Major	£20,000.00	4	18/06/2018	Contractor				Contractor made aware of services and to CAT scan before any excavations.
R20	(5) Safety/ Health	Failure of Temporary Works	H&S, cost and programme	Unlikely	Major	£100,000.00	8		selection of appropriate contractors. Quality based tender process	£0.00	Rare	Major	£10,000.00	4	18/06/2018	Contractor				
R21	(3) Reputation	Quality of workmanship	reputation, disruption, cost. Future maintenance issues	Likely	Major	£250,000.00	16		selection of appropriate contractors. Quality based tender process. Supervision and testing	£0.00	Rare	Serious	£25,000.00	2	18/06/2018	Contractor				Rigorous selection of Contractor
R22	(3) Reputation	Reputational damage	delays in doing the works, rust staining after works complete	Likely	Serious	£0.00	8		appropriate PR, liaison strategy.	£0.00	Likely	Minor	£0.00	4	18/06/2018	DBE				

R23	(5) Safety/ Health	Bridge strike	increased risk due to decreased headroom	Possible	Major	£1,000,000.00	12		navigation controls and signage.	£0.00	Rare	Major	£100,000.00	4	18/06/2018	DBE				Scaffold to be kept close to (or above) bridge soffit line.
R24	(1) Service Delivery/ Performance	Continuity of contractor	caused by the potential phase works / contract	Possible	Major	£500,000.00	12		procurement strategy. Accurate estimating	£0.00	Possible	Serious	£200,000.00	6	18/06/2018	DBE				Knowledge of availability of spans at tender stage
R25	(1) Service Delivery/ Performance	Procurement strategy	reputational, cost and programme	Possible	Major	£250,000.00	12		flexibility in procurement approach i.e. not fixed price	£0.00	Possible	Serious	£50,000.00	6	18/06/2018	DBE				
R26	(1) Service Delivery/ Performance	Continuity of personnel and supply	uncertainty of programme and phasing	Likely	Major	£50,000.00	16		procurement strategy. Buying materials upfront	£0.00	Possible	Serious	£0.00	6	18/06/2018	DBE				
R27	(4) Legal/ Statutory	Contractor dispute	cost reputation	Likely	Serious	£500,000.00	8		correct contractor selection and contract type. Good management of the contract	£0.00	Possible	Serious	£50,000.00	6	18/06/2018	DBE				Can be further mitigated by Performance Bond
R28	(4) Legal/ Statutory	Consultant dispute	cost reputation	Possible	Serious	£50,000.00	6		continued engagement with AECOM	£0.00	Unlikely	Minor	£0.00	2	18/06/2018	DBE				
						£0.00				£0.00			£0.00							
						£4,045,000.00				£0.00			£1,055,000.00							

Appendix 4 - Summary of a Charity Trustee's role - Bridge House Estates (1035628)

The City of London Corporation (the City) is the sole trustee of the charity, Bridge House Estates (the Charity). The City acts by the Court of Common Council and its committees to which functions of the charity have been delegated. All Members of the Court collectively perform that role to discharge the City's duties and exercise its powers as trustee. Each Member by virtue of their membership of the Court (and its relevant committees and sub-committees) has a duty to support the City to discharge its duties and in the exercise of its powers as trustee by faithfully acting in accordance with the terms of reference of the relevant committee or sub-committee, and the City's corporate governance framework. (Officers may also act under delegated authority).

All charity trustees must always act in the best interests of their charity and manage any conflicts of interest or loyalty accordingly. When Members of the Court (at the Court itself or across committees) are dealing with business associated with the Charity, they must ensure that the best interests of the Charity are paramount.

The City, as trustee of Bridge House Estates, has the following main duties:

1. To ensure the charity is carrying out its purposes for the public benefit.
2. To comply with the charity's governing documents and the law.
3. To act in the charity's best interests.
4. To manage the charity's resources responsibly.
5. To act with reasonable care and skill.
6. To ensure the charity is accountable.

The courts have developed principles of trustee decision-making which trustees should be able to show that they have followed. These are that in making decisions about their charity, trustees must:

1. act within their powers (i.e. consistent with the charity's objects and powers);
2. act in good faith, and only in the interests of the charity;
3. make sure they are sufficiently informed, taking any advice they need;
4. take account of all relevant factors;
5. ignore any irrelevant ones;
6. manage conflicts of interest;
7. make decisions that are within the range of decisions that a reasonable trustee body could make in the circumstances.

While the City is acting in its general corporate capacity as trustee of Bridge House Estates, the Charity Commission's guidance for local authorities acting as a charity trustee is helpful in providing clarification where an organisation, such as the City in this case, must balance its competing duties and interests (available on the Charity Commission's website at <https://www.gov.uk/government/publications/local-authorities-as-charity-trustees>; as is the Charity Commission's Conflicts of Interest Guidance, CC29 (also available on their website at: <https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29>).

The report presented to Court of Common Council on 16 January 2014 entitled "The role of the City of London Corporation as Trustee of the Bridge House Estates" clarifies the distinct functions and responsibilities of Committees that conduct business relating to the Charity as they existed at the time.

22 May 2017
Comptroller & City Solicitor's Department

Project Coversheet

[1] Ownership

Unique Project Identifier: 72800019 **Report Date:** 30/10/2019
Core Project Name: Blackfriars Bridge Parapet Refurbishment and Bridge Re-Painting
Programme Affiliation (if applicable): N/A
Project Manager: Thomas Creed
Next Gateway to be passed: Gateway 5 (regular) or Gateway 4c (Complex), depending on Member decision

[2] Project Brief

Project Mission statement: The project will repaint Blackfriars Bridge, including the gilding of embellishments where appropriate. This will significantly improve the aesthetics of the structure and protect its fabric.

The project will also repair the parapets to prevent future water ingress and protect the structure.

Definition of need: If the project is not progressed, the appearance of the bridge will further deteriorate and ultimately, the lifespan of the structure will be significantly reduced.

Reputational risk as the City would be seen to be failing to meet its obligations under the Blackfriars Bridge Act 1863 and the Corporation of London (Bridges) Act 1911 to maintain and repair the bridge.

Key measures of success:

- 1) Project to control water ingress in the structure.
- 2) Project to be completed within the budget allocated in the Bridge House Estates 50-year plan
- 3) Project to repaint the bridge, including the gilding of embellishments where appropriate; to protect the structure and improve it aesthetically.

[3] Highlights

Finance:

Total anticipated cost to deliver [£]: £7m to £12m

Total potential project liability (cost) [£]: £7m-£12m + risk (£4m)

Total anticipated on-going commitment post-delivery [£]: No Change

Programme Affiliation [£]: N/A

[A] Budget Approved to Date*	[B] New Financial Requests	[C] New Budget Total (Post approval)
£50,000	£70,000	£120,000
[D] Previous Total Estimated Cost of Project	[E] New Total Estimated Cost of Project	[F] Variance in Total Estimated Cost of Project (since last report)
£5,000,000	£8,570,000	£3,570,000
[G] Spend to Date	[H] Anticipated future budget requests	

£30,532	£8,450,000
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Headline Financial changes:

<p>Since 'Project Proposal' (G2) report: ▲£3,570,000 <i>Increase owing to better understanding of the full implications of the access restrictions, particularly because of the Tideway Tunnel works site. The increase in cost now means that the works must be procured through a full EU tender process.</i></p>
<p>Since 'Options Appraisal and Design' (G3-4) report: N/A</p>
<p>Since 'Authority to start Work' (G5) report: N/A</p>

Project Status:

Overall RAG rating: Amber
Previous RAG rating: Amber

[4] Member Decisions and Delegated Authority

N/A

[5] Narrative and change

<p>Date and type of last report: Gateway 1 / 2 March 2018</p>
<p>Key headline updates and change since last report. <i>Advice has been sought from specialist contractors and liaison with key stakeholders has led to a better understanding of the access issues faced.</i></p>
<p>Headline Scope/Design changes, reasons why, impact of change:</p>
<p>Since 'Project Proposal' (G2) report: No change in scope</p>
<p>Since 'Options Appraisal and Design' (G3-4 report): N/A</p>
<p>Since 'Authority to Start Work' (G5) report: N/A</p>

Timetable and Milestones:

Expected timeframe for the project delivery: 2-3 years

Milestones:

1) Tender Returns August / September 2019
2) Gateway 5 – October 2019
3) Estimated Completion on Site October 2020

Are we on track for this stage of the project against the plan/major milestones? Y

Are we on track for completing the project against the expected timeframe for project delivery? Y

Risks and Issues

Top 3 risks:

<i>Risk description</i>	Access issues – PLA / Tideway constraints
<i>Risk description</i>	HVM Barriers (uncertainty due to temporary nature)
<i>Risk description</i>	Terrorism – Creating new access points to the bridge

See 'risk register template' for full explanation.

Top 3 issues realised

<i>Issue Description</i>	<i>Impact and action taken</i>	<i>Realised Cost</i>
Access Issues	Restrictions have required different access solutions, leading to higher project costs and extended procurement timeframes	No costs realised to date (see above for budget variance)

Has this project generated public or media impact and response which the City of London has needed to manage or is managing?

Not to date but this may be necessary at a later date.

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Committee(s): Planning and Transportation Committee – For decision Streets and Walkways Sub-Committee – For information	Date(s): 30/10/2018 04/12/2018
Subject: Transport for London Bus Rationalisation Proposals Across London	Public
Report of: Director of the Built Environment	For Decision
Report author: Clive Whittle, Department of the Built Environment	

Summary

This report sets out the proposed response from the City Corporation to the consultation currently being carried by Transport for London (TfL) concerning proposals to make changes to their bus services across London. The majority of their proposals will take place in inner and central London, and if implemented, it will reshape the bus network to address the fall in demand for bus services and reduce bus journey times and poor reliability. The proposals will introduce a number of changes to make the bus network simpler and more efficient, such as by restructuring and curtailing some routes before they reach central London, changing some route frequencies, withdrawing some routes, and introducing one new route. The effect of this will be to reduce the number of bus kilometres travelled in central and inner London by 9 percent, giving TfL the opportunity and flexibility to reshape services where demand is increasing, such as in outer London where housing is on the rise.

The bus routes where changes are proposed which may affect City users are: route numbers 4, 26, 35, 40,45, 48, 67, 76, 100, 149, 172, 242, 341, 343, 388 and RV1. The proposed changes to these routes consist of shortening, extending, removing or rerouting, and changes to route frequencies. The effect of this will be to reduce congestion, which will reduce journey times and reduce the environmental impacts of motor vehicles. The majority of streets in the City will be unaffected by the proposals. However, on the streets affected, many will experience a reduction in the number of buses per hour travelling along them and a small number of streets will experience an increase in the number of buses per hour travelling on them.

It is recommended that the City supports TfL's proposed changes, with possible amendments as a result of the public consultation, because they are in line with the aims of City, in particular the draft Transport Strategy. The City's draft Transport Strategy, which is also included on this agenda, provides a '25-year framework for future investment in, and management of, the City's streets as well as measures to reduce the social, economic and environmental impacts of motor traffic and

congestion.’ ‘As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Improving the efficiency of buses and reducing the number of kilometres they travel will help to bring about reductions in traffic and congestion in the City, helping to improve air quality and make our streets safer.’

This consultation commenced on 28th September 2018 and closes on Friday 9th November 2018. As a consequence, this report is being presented to the Planning and Transportation Committee for decision because the deadline given for a response to the consultation does not leave sufficient time for this to be presented to the Streets and Walkways Sub-Committee.

Recommendation(s)

Members are asked to:

1. Note the report.
2. Support TfL’s proposed changes to bus services across London.

Main Report

Background

1. TfL are carrying out a consultation for proposals to make changes to 33 bus routes and introduce one new route across London, with the majority of changes taking place in central London. According to TfL the bus network is vital for London’s continued economic and social development, and it is the most accessible form of public transport, providing the widest and densest network of travel options. However, the way people travel around London is constantly changing and in central London there has been a 12 percent decline in bus use from 2014/15 to 2017/18 as people are finding new travel options that are quicker, easier and more convenient than using the bus. One reason for this is TfL’s investment in walking and cycling infrastructure, as well as improvements to the Overground and Tube network, which is affecting how people use the bus network.
2. TfL have identified parts of the bus network that are inefficient and unreliable, and acknowledge that the network can be over complicated in places. The proposals put forward have been developed to address these issues. Table 1, extracted from TfL’s consultation document summarises the changes and the routes affected.

Table 1

	Central London Route changes
Frequency reduction	53*, 58*, 149**, 205*, N205*, 242*, 388*, 476*
Frequency increase	26, 35, 46, 149**, 242**
Curtailment (shortening a route)	3, 11, 14, 19, 45, 53*, 59*, 67, 134, 171, 172, 388*, 476*
Route restructuring	4, 9, N9, 22, 40, 55, 76, 100, 205*, N205*, 242**, 341, 343
Withdrawal	48, 271 (night service) , RV1
New route	311 (new route)
Total	Note some routes appear twice above, there are 34 individual routes affected

*Some routes appear in multiple categories

** Route 149 and 242 have reductions and increases in frequency

3. The effect of the proposed changes would be to reduce the number of bus kilometres travelled of around 9% in central and inner London, and from discussion with TfL, the number of buses in the City would reduce by around 5%. However, an increase in bus passenger journey times of around one percent is anticipated, although there may be greater increases for some passengers and the number of passengers on each bus is expected to increase. Some passengers will also have to change buses to reach their destination, and TfL say they have designed the proposals to keep this to a minimum. In addition to this, where it is necessary for passengers to change buses, TfL have ensured this will be in locations where there are good passenger facilities, information and pavements with enough space to accommodate the increase in passengers.
4. The Mayor for London introduced the Hopper fare earlier this year, which allows bus passengers to make multiple journeys within an hour for no extra cost. This means that most passengers that will have to change buses as a result of these proposed changes will not incur any additional cost.
5. The Mayor for London's Transport Strategy states the importance of making the most of the flexibility of the bus network, and a reduction of bus services in central and inner London will enable improvements and extra capacity to be provided in outer London where housing is increasing and demand is expected to grow.
6. The proposals align with the City of London Corporation's draft Transport Strategy, which provides a '25-year framework for future investment in, and management of, the City's streets as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.' 'As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer.'

7. It is recognised that a reduction in bus services and kilometres travelled will mean that some bus users in the City will have to wait longer for services and some will have to change buses to reach their final destination, increasing journey times and inconveniences. This could mean that some bus users may choose to use other modes of travel or not make certain journeys if that is a viable option. Most bus users will not incur any additional cost as a result of these proposals as the recently introduced Hopper fare allows bus passengers to make multiple journeys within an hour for no extra cost.

The consultation commenced on 28th September 2018 and closes on Friday 9th November 2018. Appendix 1 shows TfL's consultation material and Appendix 2 shows TfL's supporting material.

Current Position and Proposed Changes

8. The bus routes where changes are proposed which may affect City users are: route numbers 4, 26, 35, 40,45, 48, 67, 76, 100, 149, 172, 242, 341, 343, 388 and RV1. The proposed changes to these routes consist of shortening, extending, removing or rerouting, and changes to route frequencies.

A summary of the proposed changes are as follows:

- Bus numbers where rerouting is proposed are: 4, 40, 76, and 341.
 - Bus numbers where shortening of the current routes are proposed are: 45, 67, 172 and 388.
 - Bus numbers where extensions to current routes are proposed are: 100 and 343.
 - Bus numbers where an increase in current service frequencies are proposed are 26, 35 and 48.
 - Bus numbers where a decrease in current service frequencies are proposed are: 388 and 242, although please note that a section of the number 242 will also have an extra peak journey.
 - Bus number 149 has an increase in service frequency proposed at peak times and a decrease in service frequency proposed at evenings and on Sundays.
9. Some streets in the City will have a change in the number of buses per hour travelling on them as a result of the proposals. These roads are: Blackfriars Bridge, New Bridge Street, Farringdon Street, New Fetter Lane, Fleet Street, Ludgate Hill, Queen Victoria Street, Bishopsgate, New Change, Cheapside, Queen Victoria Street, London Wall, Moorgate north, Leadenhall Street, London Bridge, Fenchurch Street, and Dukes Place / Bevis Marks.
 10. Fetter Lane / New Fetter Lane and Fenchurch Street will no longer be served by buses and the reduction in the number of buses on Moorgate/Princes Street, Poultry and Queen Victoria Street will result in fewer buses travelling through Bank Junction.

11. Plan 1 attached shows the current number of buses per hour on the City's streets and Plan 2 shows the proposed number of buses per hour as a result of the changes. Appendix 3 shows the proposed changes to bus routes in detail. Appendix 4 shows the proposed changes in the numbers of buses per hour on the affected streets in the City.

Options

12. Option 1: To support the proposals. Making bus services simpler and more efficient will help to reduce the social, economic and environmental impacts of motor traffic and congestion in the City, which aligns with aims of the City's draft Transport Strategy.
13. Option 2: To support TfL's proposals, with possible amendments as a result of the public consultation. This would meet local needs whilst ensuring the social, economic and environmental impacts of motor traffic and congestion in the City is reduced, which aligns with aims of the City's draft Transport Strategy.
14. Option 3: To oppose the proposals. This could encourage TfL to not implement the proposals as described if clear reasoning is given to support this viewpoint, which could mean the current situation will continue. If this were to happen, it would not help to support a reduction of congestion or pollution in the City, which does not align with the Corporation's Corporate Plan or its draft Transport Strategy.

Proposals

15. The recommended course of action is Option 2 - to support TfL's proposed changes to the bus services, with possible amendments as a result of the public consultation. This would enable the City Corporation to support local needs whilst ensuring the social, economic and environmental impacts of motor traffic and congestion in the City is reduced, which aligns with aims of the City's draft Transport Strategy. A reduction in bus numbers and kilometres travelled across inner and central London, whilst still providing the necessary level of service for the current demand will help to reduce traffic levels in the City, improve air quality and make our streets safer. This fits in with the aims stated in the City's draft Transport Strategy. In addition, TfL's proposed changes will help the City Corporation with regards to their overall traffic management duties of securing the efficient use of the road network, expeditious, safe and convenient movement of traffic, and avoiding congestion and disruption.

Corporate & Strategic Implications

16. The City of London Corporation's Corporate Plan 2018-23 sets out its vision. TfL's proposals would contribute to the following aims:
 - Contribute to a flourishing society
 - Support a thriving economy
 - Shape outstanding environments

17. The City of London Corporation's draft Transport Strategy, is one of a suite of strategies that help to deliver the City of London Corporation's Corporate Plan. The draft Transport Strategy provides a '25-year framework for future investment in, and management of, the City's streets as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.' 'As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer.

18. The strategy states 'We will support TfL's ambitions to adjust bus services in Central London, taking account of the forecast fall in demand following the opening of the Elizabeth Line. We will work with TfL to improve bus journey times to and connectivity through the Square Mile by:

- Reviewing bus routing and frequency throughout the City to optimise routing.
- Introducing targeted junction improvements to enhance bus priority.
- Identifying opportunities to improve bus priority when developing and implementing Traffic Management and Healthy Streets plans.'

19. This will help the City contribute to a flourishing society by:

- Making streets safer and reducing the number of traffic related deaths and serious injuries.
- Enabling people to walk and cycle and reducing the negative health impacts of transport.
- Ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together.

A thriving economy will be supported by:

- Enabling the City to continue to grow and accommodating the associated increase in demand for our limited street space.
- Improving the quality of streets and transport connections to help attract talent and investment.
- Helping create a smarter City, that supports and enables innovative transport technology and other mobility solutions.

This will help to shape outstanding environments by:

- Advocating for improved local, national and international transport connections.
- Reducing motor traffic levels to enable space to be reallocated to walking, cycling, greenery and public spaces.
- Improving air quality and reducing noise from motor traffic.
- Ensuring streets are well maintained and resilient to natural and man-made threats.

Implications

20. TfL has a legal duty to eliminate unlawful discrimination, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not, under section 149 of the Equality Act 2010. In accordance with this, TfL has carried out an Equalities Impact Assessment, which they will update as appropriate following the consultation. Further details of this can be found on page 7 of Appendix 1.

Conclusion

21. Supporting TfL's proposals for making changes to the bus network across London will, if implemented, result in a reduction in bus numbers and kilometres travelled across inner and central London, whilst still providing the necessary level of service for current demand. This will help to reduce traffic levels in the City, improve air quality and make our streets safer. This aligns with City of London's draft Transport Strategy, which provides a '25-year framework for future investment in, and management of, the City's streets as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.' 'As the City grows it will be essential to reduce motor traffic and facilitate the movement of people by the most efficient modes of transport. Reductions in traffic will also help improve air quality and make our streets safer.

22. However, it is not known how their proposals will affect the City's community. Supporting TfL's proposals, subject to the results of the public consultation will therefore enable the City Corporation to support local needs whilst ensuring that the aims of the City's draft Transport Strategy is still met.

Appendices

- Appendix 1 – Transport for London's consultation document
- Appendix 2 – Transport for London's Supporting information
- Appendix 3 – Proposed changes to bus services in the City in detail
- Appendix 4 – Proposed changes in numbers of buses per hour on the affected streets in the City

Clive Whittle

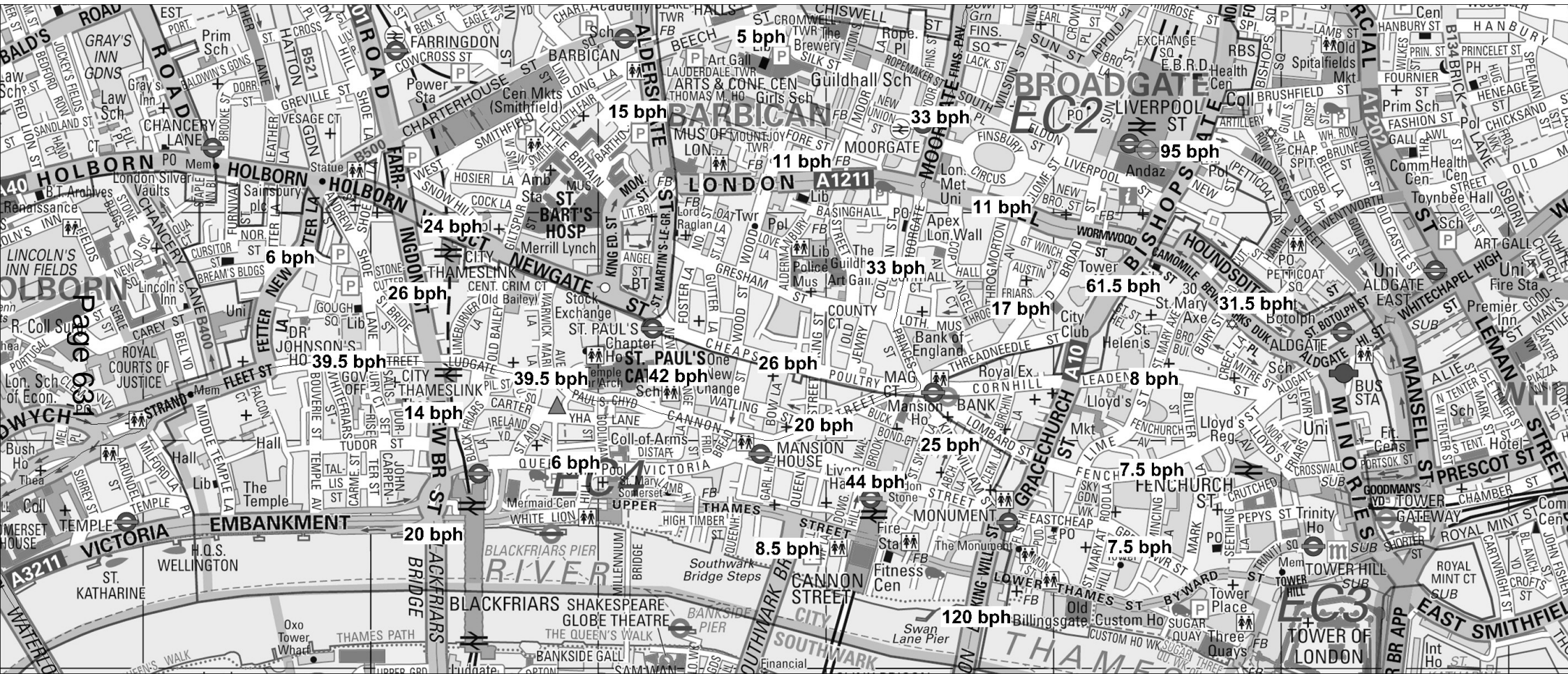
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E: clive.whittle@cityoflondon.gov.uk

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City of London - Current No. of Buses Per Hour by Street, in Each Direction



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Appendix 1



(<http://Have your say>)

Central London Bus Services Review

Closes 9 Nov 2018

Opened 28 Sep 2018

Contact

consultations@tfl.gov.uk

Overview

We are proposing to make changes to 33 bus routes, including alterations to night services and the introduction of a new route. These routes run across London, but the majority of changes take place in inner and central London.

These proposed changes would help to make the bus network simpler and more efficient and would ensure our resources are invested in the right locations.

These proposals are subject to a public consultation and we are keen to hear your thoughts on how these changes could impact on you.

The closing date for comments is **Friday 9 November 2018**.

Contents

What is proposed?

How will passengers be affected?

When would these changes start?

Have your say

What is proposed?

The way people travel around London is constantly changing. We need to have a public transport system that adapts to varying demand, while supporting economic growth and allowing Londoners to live, work and enjoy life in the Capital.

Buses play a unique role in the life of London. They are the most accessible form of public transport and they provide the widest and densest network of travel options for distances that are too long to walk or cycle. Good reliable bus services are fundamental to how our customers move around the city.

The bus network is crucial to London's continued economic and social development, and will be vital in meeting the Mayor's Transport Strategy target of 80 per cent of journeys being made using sustainable transport options by 2041.

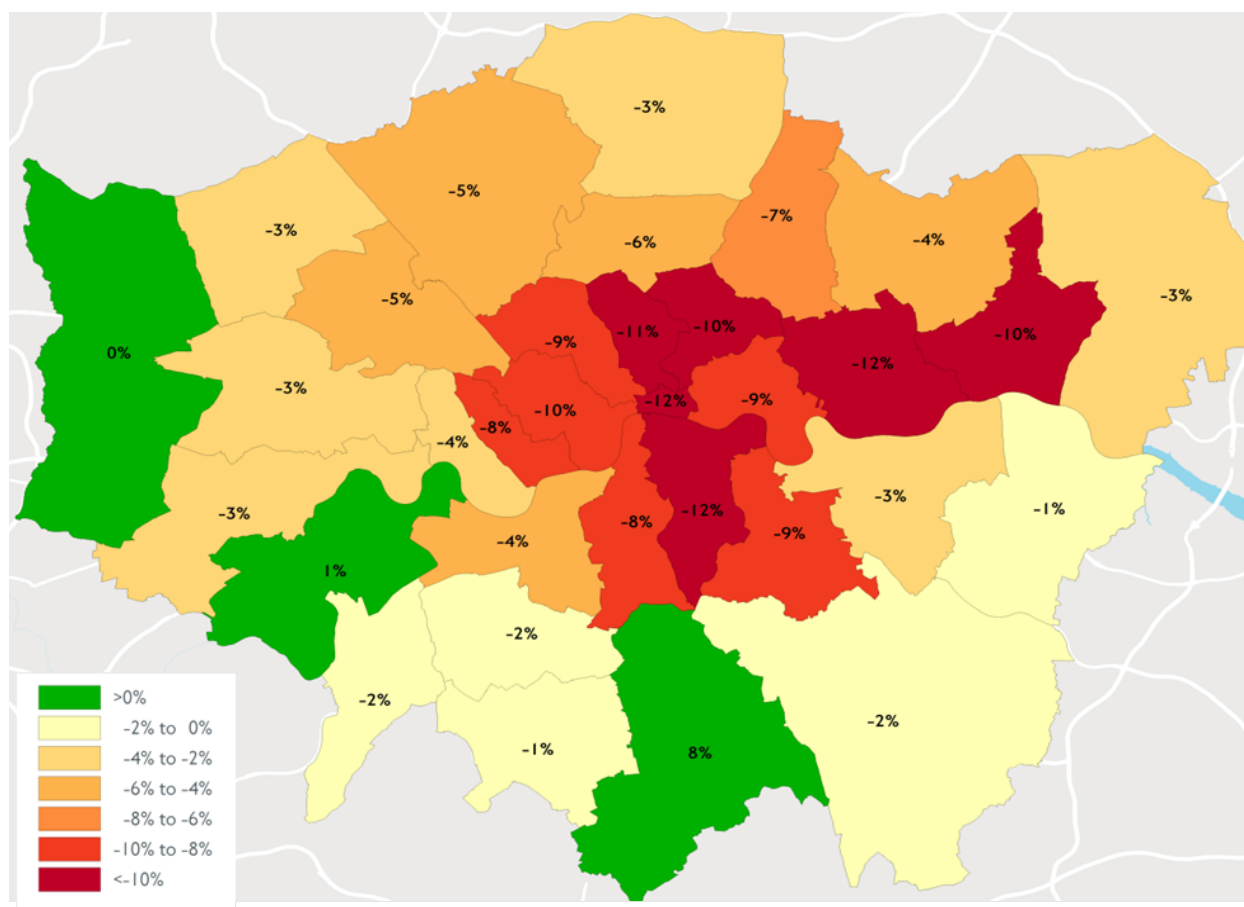
In 2016 the Mayor introduced the Hopper fare which has already helped millions of passengers make affordable bus journeys across London. The Hopper fare allows Londoners to make multiple journeys within one hour at no extra cost.

The Mayor's Transport Strategy also stated the importance of making the most of the flexibility of the bus network to reduce and remove existing services where they are no longer required in central and inner London and use this capacity to provide new or improved services in outer London.

Our investment in walking and cycling infrastructure, as well as improvements to the Overground and Tube network, is starting to change how our customers use the bus network.

Our customers are now finding that they have a number of new travel options that are quicker, easier and more accessible when compared to their existing bus journeys. This change in bus use is most pronounced in Central London and the map below illustrates how many people are using our buses and how this has changed considerably during the period 2014/15 – 2017/18.

Map 1 Change in bus capacity utilisation by Borough, 2014/15 – 2017/18



We are taking steps to address this decline in bus use in Central London. One way to address this is to improve our customer experience by tackling bus journey times and reliability. In Central London we are looking to prioritise buses on our roads. These measures will help make bus services better to use, but we recognise that more needs to be done to re-shape and improve the bus network in Central London.

To further address the fall in demand and improve customer experience we need to tackle specific challenges that exist with the bus network. These challenges include:

1. **Parts of the network are inefficient** - We are not currently making the best use of the bus network with some parts of Central London experiencing an over supply of buses when compared to customer demand. For example there are over 100 buses an hour travelling through Kingsway, with many buses running with significant excess capacity.
2. **Some services are unreliable** – By running too many excess buses we add to the problem of congestion on London’s roads. Congestion not only slows down bus journey times but can also make our services less reliable. When services are slow and unreliable customers will look for alternative means of transport.
3. **Our network can be over complicated** - where we have multiple routes serving the same area our customers can find it difficult to understand their best travel option. Customers need to understand which route offers them the fastest and most reliable service to their destination.
4. **Our resources are not deployed where they are needed most** – One of the strengths of the bus network is that it can be adaptable and flexible when the needs of our customers change. This flexibility will allow us to reduce or remove services where demand is falling, while affording us the opportunity to re-shape the network where we see an increase in demand e.g. in Outer London where growth in housing is on the rise.

To start to address these challenges we are proposing to make changes to 34 bus routes, including alterations to a small number of night services and the introduction of a new route. These routes run across London, but the majority of changes take place in inner and central London.

These proposed changes would help to make the bus network simpler and more efficient and would ensure our resources are invested in the right locations.

These proposals are subject to a public consultation and we are keen to hear your thoughts on how these changes could impact on you. You can respond to the consultation and let us know your views on the proposed changes by completing the questionnaire on this website.

You can also submit a response by writing to us via email or post. Our email address is consultations@tfl.gov.uk and our postal address is FREEPOST TFL CONSULTATIONS.

The closing date for comments is **Friday 9 November 2018**.

Please get in touch using the details above if you would like this information in alternative formats.

The following sections describe our proposals in more detail.

How will passengers be affected?

We are planning to reshape the bus network to make it simpler and more efficient. We propose to do this by:

- Restructuring routes
- Curtailing i.e. shortening routes
- Withdrawing 3 routes, or
- Increasing or decreasing the frequency of the routes in scope

We are also proposing to introduce one new route.

Where we propose to shorten or withdraw a route, customers will need to change on to an alternative service to reach their intended destination. This can be done at no extra cost due to the Hopper fare, as long as the change is made within one hour of departure. We anticipate that only a small proportion of interchanges would fall outside of an hour, well under 1% of trips.

A summary of the routes in scope and the change that we propose can be seen below:

	Central London Route changes
Frequency reduction	53*, 59*, 149**, 205*, N205*, 242*, 388*, 476*
Frequency increase	26, 35, 46, 149**, 242**
Curtailment (shortening a route)	3, 11, 14, 19, 45, 53*, 59*, 67, 134, 171, 172, 388*, 476*
Route restructuring	4, 9, N9, 22, 40, 55, 76, 100, 205*, N205*, 242**, 341, 343
Withdrawal	48, 271 (night service) , RV1
New route	311 (new route)
Total	Note some routes appear twice above, there are 34 individual routes affected

*Some routes appear in multiple categories

** Route 149 and 242 have reductions and increases in frequency

The impact of these changes would be an overall reduction in central and inner London bus kilometres of around 9 per cent. We anticipate that there would be a marginal increase in customer journey times of around 1 per cent. There may be greater increases for some of our customers and we would like to hear about any issues with your journey in your consultation response.

Where we propose a curtailment, route restructuring or withdrawal, some customers will need to change bus to reach their destination. We have designed these proposals to keep the number of these customer interchanges to a minimum.

To help ensure customers can interchange safely we:

- Carefully plan interchanges and bus stop arrangements to make changing bus as simple as possible;
- Focus any new route interchanges at locations that already provide good passenger facilities e.g. shelter, quality of information, and pavements wide enough to accommodate additional customers;

- Work with boroughs to enhance signage, wayfinding and the public realm at existing and new interchanges if required; and
- Brief bus drivers to ensure they are able to assist customers where new interchanges have been introduced.

We recognise that customers who would need to interchange may have some specific views on how this will impact on their journeys. We are keen to understand any journey specific issues that may arise. This feedback can be shared through the consultation process.

Overall, the routes that we propose changing cover nearly 500km of road in London. Of this, just 0.4 per cent of these roads (around 2km) would no longer be served by buses as a result of our proposed changes.

Impact on protected groups

We have undertaken an Equality Impact Assessment (EqIA). The EqIA examines what impact (positive or negative) all of the proposed route changes have on customers with characteristics protected by the Equality Act.

We consider the impacts of bus service change proposals on equality groups throughout the planning process, ensuring, where possible, effective mitigations are in place where no viable alternative is available. This EqIA can be found here

https://consultations.tfl.gov.uk/buses/central-london/user_uploads/central-london-bus-service-change-proposals-eqia.pdf

We would like to hear your view on our EqIA and the mitigations it suggests. A question on the EqIA is included in our consultation survey.

Many of the proposed changes are connected so we have grouped them to make it easier to understand what is proposed. Using the links below you can find out more about each proposal.

[Tottenham Court Road \(/buses/911d09c6\)](/buses/911d09c6)

- Route 14
- Route 134

King's Road, Piccadilly, Shaftesbury Ave (/buses/f28a1e04)nue (/buses/f28a1e04)

- Route 9 and Route N9
- Route 11
- Route 19
- Route 22
- Route 311

Whitehall and Westminster Bridge (/buses/16b1c48f)

- Route 3
- Route 53

Waterloo to Fleet Street (/buses/917a3e5f)

- Route 4
- Route 172
- Route 341

Euston Road (/buses/86debfba)

- Route 59
- Route 476

Marylebone Road (/buses/0dc6c7c4)

- Route 205 and Route N205

Kingsway (/buses/5bb9bb24)

- Route 171

Kingsland Road (/buses/a543b5a7)

- Route 67
- Route 149
- Route 242

Blackfriars and London Bridge (/buses/32943d3b/)

- Route 35
- Route 40
- Route 45
- Route 46
- Route 76
- Route 100
- Route 388
- Route 343
- Route RV1

London Bridge and Hackney Road (/buses/07b2b33c)

- Route 26
- Route 48
- Route 55

Holloway Road (/buses/1e22c2e8)

- Route 271 (night service)

When would these changes start?

If we decide following consultation to go ahead with these proposals then they could be introduced in spring 2019.

Have your say

We would like to know what you think about our proposals for the central London bus network

We will analyse and consider all of the responses received to the consultation, and publish our response in due course. We make our final decisions based on feedback received through the consultation alongside technical constraints and requirements, including financial, legal, safety and technical issues.

The timing and implementation of all the proposed changes are, of course, subject to the outcome of this consultation, further approvals and the availability of funding.

Please give us your views by completing the online survey below by **Friday 9 November 2018**.

Alternatively, you can:

- Email us at consultations@tfl.gov.uk (<mailto:consultations@tfl.gov.uk>)
- or write to us at FREEPOST TFL CONSULTATIONS

You can also request paper copies of all the consultation materials and a response form by emailing consultations@tfl.gov.uk, writing to FREEPOST TFL CONSULTATIONS, or calling 0343 222 1155. Please get in touch using the details above if you would like information in alternative formats.

Have your say

Online Survey

(<https://consultations.tfl.gov.uk/buses/central-london/consultation/>)

Related

Route RV1 - Review of Usage and Service Planning
(https://consultations.tfl.gov.uk/buses/central-london/supporting_documents/routerv1reviewofusageandserviceplanning.pdf)
963.6 kB (PDF document)

Central London Bus Services Consultation - Supporting Material (updated 4 October 2018) (https://consultations.tfl.gov.uk/buses/central-london/supporting_documents/centrallondonbuservicesconsultationsupportingmaterial.pdf)

527.6 kB (PDF document)

Central London Bus Service Change Proposals - EQiA
(https://consultations.tfl.gov.uk/buses/central-london/supporting_documents/centrallondonbuservicechangeproposalseqia.pdf)
778.4 kB (PDF document)

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All Areas

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Central London Bus Services Consultation – Updated Supporting Material

October 2018

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1. Introduction

This report supports our Central London Bus Services Consultation, which you can respond to by completing the questionnaire on our consultation hub [here](#)¹

You can also submit a response by writing to us via email or post. Our email address is consultations@tfl.gov.uk and our postal address is FREEPOST TFL CONSULTATIONS.

2. Methodology and findings

In this report you will find a summary of our analysis of key bus services or corridors in central London.

We identified any change in bus usage by looking at historic and current demand for buses and matching this with the service we currently provide in central London.

We have two primary data sets which we use to measure capacity, one is called Keypoints and the other is ODX.

Keypoints data is a roadside loading survey conducted by surveyors counting the number of customers boarding, alighting and on-board each bus at a number of key points along the route.

ODX uses Oyster card data gathered from customers touching their Oyster or contactless card when they board the bus. It also infers a proportion of alighting trips based on other Oyster transactions. The data is scaled to take account of trips that can not be inferred (either the system knew a customer boarded the network but the algorithm was unable to conclude an alighting point, or if a non-contactless method were used).

This data lets us see where we are providing buses with excess capacity - unused sitting or standing space.

We have used this information to develop our proposed changes to our central London bus network. These changes were appraised by balancing the cost or saving against the customer benefit or disbenefit attributable to each proposal. This also takes into account changes in revenue.

¹ You can respond to the survey here: tfl.gov.uk/central-London-bus-consultation

3. Re-shaping the bus network

London's bus network has evolved over a number of years to accommodate the changing needs of the city. As travel demands change, we need to reshape the bus network to meet customer requirements and to support the goals of the Mayor's Transport Strategy (MTS). The MTS outlines the policies² and proposals that we, and London Boroughs, will deliver to ensure our bus services are faster, more reliable and effectively integrated with London's rail and Tube network.

Through our bus priority programme, we are taking action to improve bus journey times and reliability in central London. This programme includes plans to deploy bus priority measures such as 24 hour bus lanes, and bus and cycle-only corridors.

However, our data shows there has been a fall in demand for buses in central London as customer transfer to the new and upgraded rail network and to cycling and walking.

Excess bus provision has several disadvantages: it adds to congestion on London's roads, negatively affects London's air quality, can lengthen bus journey time (where bus-on-bus congestion occurs) and is an inefficient use of our resources.

Where demand has fallen we now need to take action to ensure our resources are being used effectively, that bus capacity matches demand, and that we do not add to congestion on London's roads by running excess services.

One of the strengths of the bus network is that it is adaptable and flexible when customer needs change. This flexibility allows us to reduce or remove services where they are no longer required, while also affording us the opportunity to reshape the network where there is an increase in demand, for example in Outer London.

Our proposals in the Central London bus consultation align with the strategy described on pages 156-8, and proposal 57³ of the MTS.

During our review and proposal development we balanced the costs, customer numbers, revenue and customer benefit against one another. As a complete package we forecast our proposals to save around £12 million per annum (net), this includes changes in revenue generation which may occur as an outcome of our proposals. Any savings realised as a result of these proposals will be reinvested into improving the transport network for the millions of people who rely on it everyday.

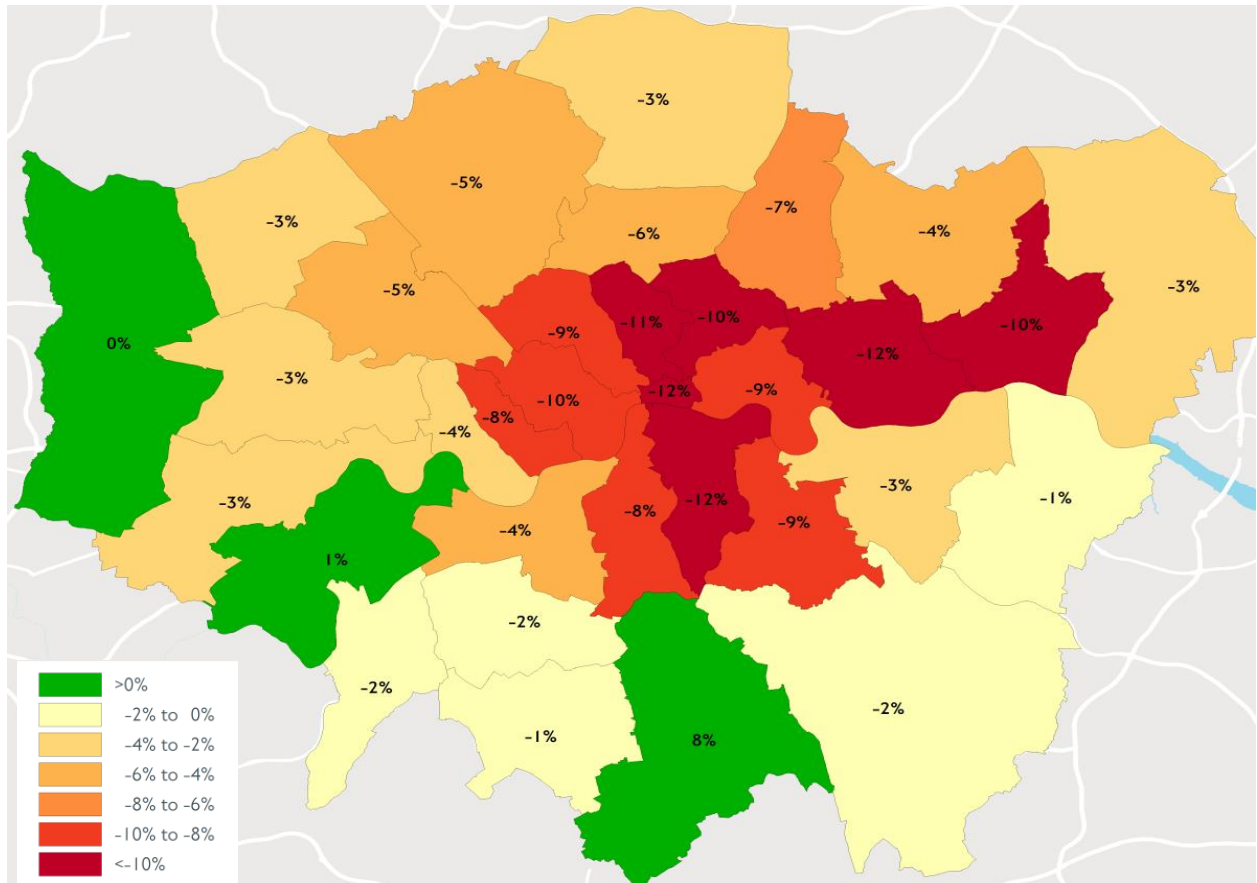
² Mayors Transport Strategy 2018, Page 155, Policy 15, you can read the full MTS here: tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy

³ Mayors Transport Strategy 2018, Page 158, Proposal 57

4. Why we reviewed central London

Central London is where there is the greatest opportunity to improve bus journey times and reliability. Through these service changes, our ambition is to make central London buses simpler to use, while also helping to improve air quality and reduce congestion on London's roads.

Demand in central London has declined over the past four years. The majority of this has happened in the past two to three years. Across central London since 2014/15 we have seen a decline in bus use by between eight-12 per cent. Figure 1 shows the spatial distribution of this on a London-wide scale.



Map – Change in capacity utilisation by Borough, 2014/15 – 2017/18

Changes by route

5. Tottenham Court Road – Routes 14 (24 hour) and 134 (24 hour)

Route 14 runs between Putney Heath and Warren Street Station (University College Hospital). Demand for route 14 has been declining. In July 2017 and January 2018 frequency was reduced on this route to better match demand.

Our data shows us that demand for route 14 is greatest at South Kensington (Onslow Square) towards Warren Street, when at its busiest time 7.9 buses per hour are required, and 8 are scheduled. However, it also shows that demand drops off between Tottenham Court Road and Warren Street (University College Hospital), where 20 buses per hour are required and 33 are scheduled.

In parallel with this, we are withdrawing route 10 between Marble Arch and the British Museum/Russell Square.⁴ This will however leave the British Museum without a service.

As demand for the 14 between Tottenham Court Road and Warren Street (University College Hospital) has declined we propose to fill the gap created by the withdrawal of route 10 with route 14.

Customers wishing to travel between Tottenham Court Road and Warren Street can interchange and use routes 24 or 29 to reach their destination.

Route 134 runs between North Finchley Bus Station and New Oxford Street. The busiest parts of the route are Highgate station and Highgate Wood towards Tottenham Court Road during the morning peak, where between 9 and 10 buses per hour are required to meet demand (10 buses per hour are scheduled).

Our proposals

To better match capacity to demand and to maintain a service to the British Museum we propose:

- Change route 14 so that it no longer runs between University College Hospital and Tottenham Court Road station and instead provide a link to the British Museum and Russell Square via Great Russell Street
- This means route 14 no longer serves Goodge Street station, Warren Street station, Euston Square station and University College Hospital
- Change route 134 so that it no longer runs between Tottenham Court Road station and University College Hospital
- The 134 will no longer serve Gower Street, Tottenham Court Road or Bloomsbury Street

Impact of change

These changes will improve the resilience and reliability of route 134 and N134 and allow us to retain a route serving the British Museum. Proposed changes would make a net saving of £550,000 per annum.

⁴ We consulted on this change in late 2015, you can find further details here: <https://consultations.tfl.gov.uk/buses/7-10-98/>

As a result of our proposal some customers would need to change bus, where previously their journey was direct. This will affect:

- Four per cent, 503 trips daily on route 14
- Eight per cent, 2,055 trips daily on route 134

Route 134 Customers can make these journeys by interchanging with routes 24 or 29.⁵

6. Kings Road to Shaftesbury Avenue corridor – Routes 9 and N9

Piccadilly and Pall Mall became two-way for all traffic from November 2011. Following this change, route 9 was re-routed via Pall Mall in February 2012. However, since the change in route the number of journeys made on route 9 has decreased, by 2,500 a day.

In April 2017 the frequency of route 9 was reduced from 10 buses per hour to eight buses per hour to match customer demand.

Our data has shown us that since 2012 there has been an increase in demand at stops at Green Park and Trafalgar Square of around 1,000 journeys. However, during this time we have also seen a total of 3,571 fewer journeys made to/from stops on Pall Mall.

Therefore a total of around 2,500 fewer trips are made on route 9 as a result of the re-routing via Pall Mall.

Our proposals

To better match demand for services we propose to:

- Re-route the 9 and N9 via Piccadilly Circus in both directions

Impact of change

We believe this will simplify the local network, while increasing frequency along Piccadilly for common destinations. We do not propose to change the frequency of either route 9 or N9. Proposed changes would increase revenue by around £50,000 per annum

Customers who currently use stops on Pall Mall (1,114 daily trips) will have to walk 340 metres to Piccadilly. Our proposal will make the journey time up to a minute slower; however this is unlikely to have an impact on bus reliability.

7. Kings Road to Shaftesbury Avenue corridor – Routes 11, 19, 22 and 311

Route 11 runs between Fulham Town Hall and Liverpool Street station, route 19 runs between Finsbury Park Interchange and Parkgate Road. Both routes are long and run across zone 1, making them susceptible to variable traffic conditions which reduces their reliability.

⁵ Customers interchanging more than an hour after departure, would not be covered by the Hopper fare and would have to pay an additional fare. The maximum daily cap for bus fares is £4.50. We will investigate opportunities to minimise this impact on customers.

Routes 11 and 19 parallel each other between Beaufort Street and Sloane Square. We found significant surplus capacity on route 19 between Battersea Bridge and Holborn, especially on the King's Road where route 11 overlaps route 19. A maximum of 19 buses per hour are required to meet demand during the AM peak, 37 are currently scheduled.

The busiest point on route 19 is Islington Town Hall towards Battersea Bridge where 9.8 buses per hour are required to meet demand, 10 are scheduled.

The busiest point on route 22 is Chelsea Old Town Hall towards Putney Common in the afternoon peak where 7.4 buses per hour are required to meet demand, 8 are scheduled.

During the busiest hour a total of 6.3 buses are required to meet demand departing Sloane Square northbound in the AM peak on routes 19 and 22, where 15.5 buses per hour are scheduled. At this time sufficient capacity is provided on route 22 to meet the demand on both bus routes.

Our data demonstrates that route 11 is operating with surplus capacity. At its busiest point, Chelsea Old Town Hall, during the morning peak a maximum of 4.6 buses per hour are required to meet demand, 6 buses are currently scheduled.

Our proposals

To better match capacity to demand and maintain connections from the King's Road to Oxford Circus we propose to:

- Introduce a new route, the 311, between Fulham Broadway and Oxford Circus via Victoria station
- Change route 11 so it will no longer run between Fulham Town Hall (for Fulham Broadway station) and Victoria
- Change route 22 so it no longer runs between Green Park and Oxford Circus and instead extend it from Green Park to Piccadilly Circus, Charles II Street
- Change route 19 so that it no longer runs between Holborn and Battersea Bridge
- Create a new stand at Victoria for route 11 on Buckingham Palace Road, north of Victoria Street – using an existing bus stop
- Repurpose a route 171 bus stand at Holborn, New Oxford Street for route 19
- Repurpose a route 11 bus stand at Fulham Broadway stand for route 311
- Repurpose a route 22 bus stand at Oxford Circus, Henrietta Place for route 311

Impact of change

By making these changes we will provide new connections between Buckingham Palace Road and Mayfair/Oxford Circus. This will also improve resilience and reliability on routes 11 and 19 by reducing the length of their routes.

These changes will maintain sufficient capacity to meet demand between the King's Road and Holborn, while retaining a bus service between Mayfair and the King's Road. These proposed changes could realise a net saving of £1,450,000 per annum.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Ten per cent, 1800 trips on route 11
- Five per cent, 500 trips on route 22
- Eighteen per cent, 5,200 trips on route 19

A total of 3,500 of these trips can be made by interchanging once, 1,200 can be made by walking up to 650 metres to the King's Road and 550 would require interchanging twice.

8. Whitehall and Westminster Bridge – Routes 3 and 53

Route 3 parallels route 159 between Trafalgar Square and Brixton, with the exception of the section between Parliament Square and Lambeth Road. Route 53 parallels routes 453 for 8.9km between Whitehall and Deptford.

Across these four routes we have identified excess capacity between County Hall and Whitehall due to a slowing of bus speeds over the past few years. Currently we schedule 58 buses per hour between these two points. We have found that a maximum of 22 is required.

Routes 53 and 453 share a long parallel between Trafalgar Square and Deptford and route 53 is long and susceptible to delays and unreliability. During the morning peak a maximum of 22.4 buses are required to meet demand at the busiest point on these two routes, between Bricklayers Arms towards Trafalgar Square. We currently schedule 24 buses.

A maximum total of 14 buses are required to meet demand in the peak hour at Lambeth North, we currently schedule 24. Demand west of Lambeth North is significantly lower due to changes to the road layout at Parliament Square.

Our proposals

We believe the following changes will make best use of our resources and remove underutilised buses from London's roads:

- Change route 3 by stopping it at Whitehall Place instead of Trafalgar Square. Route N3 would remain the same as now
- Change route 53 to no longer run between Whitehall and County Hall
- Renumber the night service as the N53 but otherwise retain the current night service route and frequency
- Reduce frequencies on route 53 from every 7.5 minutes to every 8 minutes, whilst retaining an additional westbound journey in the morning

Impact of change

These changes will improve the operational resilience and reliability on route 53. These proposals would realise net savings of £1,000,000 per annum.

To facilitate the route 53 proposals we will alter the stand location for route 341 at Waterloo from Addington Street to Waterloo Road. This will mean that stops on York Road, Bayliss Road and Lower Marsh would no longer be served by route 341. Currently, 350 customers make trips to or from the affected stops, all of which can be made with interchange onto route 76.

As a result of our proposals some customers on route 53 would need to change bus, where previously their journey was direct. This will affect two per cent, 740 trips daily. All of which can be made by changing bus onto route 453.

9. Waterloo to Fleet Street – Routes 4, 76, 172 and 341

Routes 4, 26, 76, 172 and 341 currently run between Waterloo and Fleet Street. Routes 76 and 341 run 24 hours a day and route N26 runs between Trafalgar Square and Chingford. A maximum of 16.5 buses per hour are required to meet demand between Waterloo and Aldwych, 34 are currently scheduled.

Demand on routes 4, 26, 76, 172 and 341 has decreased significantly between Waterloo and Fleet Street. Our 2014 bus usage data survey showed the morning peak hour load departing Waterloo was around 1,870, but by 2016 it had fallen to 1,383, a decrease of 487 customers or 26 per cent across the four routes.

Connections between Angel Islington and Fleet Street/Waterloo are slow and indirect. There is no direct connection between Farringdon and Angel, Islington.

Route 4 is well used between Islington and the Barbican but demand quickly reduces south of this point. The number of longer trips between Waterloo/Fleet Street and areas north of Angel are low.

Our proposals

To better match capacity to demand and provide a direct link between Farringdon station and Islington we propose:

- Re-route the 341 via Farringdon Road
- Change route 4 so that it no longer runs between Waterloo and New Change and extend it to Blackfriars via Queen Victoria Street
- Change route 172 so it no longer runs between Clerkenwell Green and Aldwych
- Re-route the 76 via London Wall and New Change
- Alter the stand location for route 341 at Waterloo from Addington Street to Waterloo Road

Impact of change

If implemented these changes would provide 22 buses per hour between Waterloo and Fleet Street during the morning peak on routes 26, 76 and 341.

These proposals would create new links between Blackfriars and Islington, and provide faster journey times between Waterloo and Islington by up to 2 minutes in each direction on route 341.

Proposed changes would also improve the operational resilience and reliability of route 4. They would make a net savings of £615,000 per annum.

The proposed change to route 76 would remove a unique bus movement from Bank junction, which could give more time for pedestrians to cross. This is a City of London aspiration.

This would also support our proposed changes to routes 45 and 388 which will remove a connection for customers at London Wall and New Change.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Six per cent, 1,300 trips on route 4
- Three per cent, 580 trips on route 76
- Three per cent, 400 trips on route 172

- Seven per cent, 1,380 trips on route 341 – most of these are within 450 metres walking distance of their end destination, Farringdon Road

These changes would also break the direct bus link between southeast London and Fleet Street. However, customers who will travel between southeast London and Fleet Street will be able to change bus at Elephant & Castle onto route 63 which will take them to Fleet Street/Ludgate Circus. Our data shows this will be a faster journey.

10. Euston Road – Routes 59 and 476

Routes 59 and 476 both run between Euston Road between King's Cross and Euston Bus Station. Route 59 runs between Streatham Hill and King's Cross, route 476 runs between Euston Station and Northumberland Park.

During our review we found that there is excess capacity on the Euston Road between King's Cross and Euston Bus Station, along which routes 30, 59, 73, 91, 205, 390 and 476 run. Routes 59 and 91 closely parallel each-other between King's Cross and Aldwych. While routes 73 and 476 parallel each-other between Stoke Newington and Euston Station.

We found that at its busiest point at Kennington, route 59 requires a maximum of 10.8 buses per hour to meet demand, 13 are currently scheduled.

On route 73, a maximum of 12 buses per hour are required to meet demand at Angel, 15 are scheduled.

On routes 73 and 476 a maximum of 11 buses per hour are required to meet demand at King's Cross, 22.5 are scheduled.

Our proposals

To better match capacity to demand we propose:

- Change route 59 so that it no longer runs between King's Cross and Euston Bus Station
- Remove two additional journeys on route 59 towards Euston in the morning peak and an additional journey towards Brixton in the evening peak
- Change route 476 so that it no longer runs between Euston Bus Station and King's Cross Station
- Reduce frequencies on route 476 from every 8 to every 10 minutes, Monday to Saturday daytimes, to better match demand
- Repurpose a route 476 bus stand at Euston Bus Station for route 59
- Repurpose a route 59 bus stand at King's Cross, York Way for route 476

Impact of change

We believe these changes will better match capacity to demand, with a total of 30 buses per hour now traveling on Euston Road. They will also improve resilience and reliability of routes 59 and 476.

These proposed changes would make net savings of £1,200,000 per annum.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Two per cent, 620 trips daily on route 59
- Three per cent, 580 trips daily on route 476

11. Marylebone Road – Routes 205 and N205

Route 205 runs between Paddington Station and Bow Church. It serves Marylebone Station by running via Melcombe Place in both directions. Route 453 parallels route 205 between Marylebone Station and Great Portland Street.

During 2016/17 our data shows daily usage on route 205 increased by three per cent between Mondays to Friday. However, it decreased by one per cent on Saturdays and by two per cent on Sundays. The usage increase on weekdays is largely due to significant frequency decreases on routes 25 and 18 which both share long parallels with route 205. During this same time we saw daily usage on route N205 has increased by five per cent on weeknights, and decreased by 12 per cent on weekend nights. A factor in decreasing demand for night services is the introduction of the Night Tube towards the end of the first year of the data collection.

Our proposals

To better match capacity to demand we propose to:

- Re-route the 205 and N205 direct via Marylebone Road, so it would no longer serve Melcombe Place.
- This would mean that the 205 and N205 would no longer serve stops at Marylebone station
- Decrease the frequency of service on Monday to Saturday from every 8 minutes to every 9 minutes, to better match demand

Impact of change

We believe these proposals will improve journey times. Proposed changes would make a net saving of £235,000 per annum.

Customers waiting at stops 1584 and 1589 on Marylebone Road will see an increase in frequency for journeys between Baker Street and Warren Street due to route 205 serving these stops instead of stops at Marylebone station.

There would be a decrease in journey times for approximately 2,670 through-customers daily, and a frequency increase for the approximately 1,180 customers who currently travel between stops on Marylebone Road and common sections of routes 18 and 27. About 1,290 customers daily would have to walk approximately 180 metres to stops on Marylebone Road.

Reliability of both routes 205 and N205 will be improved by these proposed changes. By running via Marylebone Road, rather than Marylebone Station, the return running time for the bus should be reduced by up to three minutes.

There will be a decrease in capacity between Marylebone Station and Great Portland Street and an increased walking distance by 180 metres for customers boarding or alighting at Marylebone Station.

Our data shows us that re-routeing the N205 via Marylebone Road would negatively affect 65 customers on weekend nights and a smaller number on weeknights. However, we believe the change in route would benefit approximately 330 weekend customers.

As a result of our proposals no customers would need to change bus and all trips would end within walking distance of their previously journey.

12. Kingsway – Route 171

Route 171 parallels routes 1, 68, 168 and 188 between Elephant & Castle and Holborn and along the Kingsway. Routes, 1, 68, and 171 have corresponding night routes (N1, N8 and N171) route 188 is a 24-hour route. Since 2015/16 we have seen weekday usage decreased on routes 1, 168, 171 and 68.

The majority of this lost demand has been during off-peak and we have seen the greatest loss in demand during weekends. In April 2017 we reduced frequency to match the drop in demand. Conversely, during this time we have seen demand rise slightly on route 188.

Our data shows around 10 buses per hour of excess capacity are currently operated between Elephant & Castle and Holborn along the Kingsway during the peak hour. A maximum of 29.1 buses are required to meet demand at Aldwych, 39 are currently scheduled.

Our proposals

To better match capacity to demand we propose to:

- No longer run route 171 between Elephant & Castle and Holborn. The service will continue to run between Elephant & Castle and Bellingham
- Bring into use a spare 2-bus stand on Borough Road, South Side, accessed by Newington Causeway

Impact of change

We believe that withdrawing route 171 between Elephant & Castle and Holborn will better match capacity to demand and improve resilience and reliability. Route 171 is currently very long with cycle times of up to 200 minutes.

This proposal would realise net savings of £710,000 per annum.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect eight per cent, 2,100 trips daily.

13. Kingsland – Routes 67, 149 and 242

Route 67 runs between Wood Green and Aldgate, route 149 runs between Edmonton Green and London Bridge. They parallel each other between South Tottenham and Shoreditch High Street station.

Route 242 runs between Homerton Hospital and St Paul's. It parallels the 67 and 149 between Dalston Junction and Shoreditch High Street station. It further parallels the 149 between Shoreditch and Threadneedle Street.

Route 67 provides unique connections to Aldgate from Shoreditch and Kingsland Road and is also the only route to run on Commercial Street.

All three routes provide unique links across Shoreditch. Route 67 serves Commercial Street, the 149 serves London Bridge, and the 242 serves Cheapside.

While capacity is generally well matched to demand across those routes, we found that there is excess capacity between Dalston Junction and Liverpool Street where all three routes converge and parallel one another. During the morning and evening peaks a maximum of 14 buses per hour are required, where 26 buses per hour are provided.

Our proposals

To better match capacity to demand we propose to:

- Change route 67 so that it no longer runs between Dalston Junction station and Aldgate
- Divert route 242 at Shoreditch to run via Commercial Street to Aldgate
- Change frequencies on the on route 149 to
 - Increase Monday to Saturday frequencies in the middle of the day from every 8-9 minutes to every 6 minutes
 - Decrease evening frequencies from every 8 minutes to every 10 minutes
 - Decrease Sunday frequencies from every 8 minutes to every 10 minutes
- We would also change frequencies on the 242 to
 - Decrease Monday to Saturday daytimes from every 7-8 minutes to every 10 minutes
 - Decrease evenings and Sundays from every 6 minutes to every 12 minutes
 - Introduce an extra peak journey on the Liverpool Street to Shoreditch to Kingsland Road section

Impact of change

We believe these changes will improve the resilience and reliability of routes 67 and 242. These proposed changes would realise a net saving of £1,800,000 per annum.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Twelve per cent, 2,200 customers on route 67
- Thirteen per cent, 1,930 customers on route 476

14. Blackfriars and London Bridge – Routes 35, 40, 45, 46, 343, 388 and RV1

Routes 35, 40, 45, 388 and RV1, all cross the Thames via either Blackfriars Bridge, Waterloo Bridge or London Bridge:

- Route 35, a 24-hour service, runs between Clapham Junction and Shoreditch High Street
- Route 40 runs between Dulwich Library and Aldgate
- Route 45 runs between King's Cross and Clapham Park

- Route 46 runs between Lancaster Gate and St Bartholomew's Hospital
- Route 343 runs between London Bridge, City Hall and New Cross
- Route 388 runs between Stratford City and Elephant & Castle
- Route RV1 runs between Covent Garden and Tower Gateway Station

Through our review we identified excess capacity across routes 17, 45, 46, and 63 at King's Cross, where at the busiest time nine buses per hour are required to meet customer demand, and 18 buses per hour are scheduled.

- Routes 45 and 46 provide a southbound link from bus stop D at King's Cross station to Gray's Inn Road/Chancery Lane station. Approximately 335 customers depart from this stop on this corridor in the busiest hour. Our data shows us that an additional journey on route 46 would provide sufficient capacity without route 45.
- Approximately 710 customers arrive at King's Cross on routes 17, 45 and 46 from the Chancery Lane/Gray's Inn Road corridor at the busiest hour. Our data shows that the existing frequency on route 46 - of six buses per hour - and on route 17 - of seven buses per hour - would provide sufficient capacity to meet demand if route 45 did not serve this section.
- Routes 45 and 63 run in parallel between Elephant & Castle and Charterhouse Street; providing links between this section and King's Cross. Approximately 325 customers arrive, and 470 depart from King's Cross on routes 45 and 63 during the busiest hour. Our data shows that existing frequency on route 63, of eight buses per hour, provides sufficient capacity to meet demand without route 45.

In the morning peak hour approximately 670 customers travel northbound on routes 35 and 40 between Walworth Road and Newington Causeway/Borough High Street. In the evening peak hour approximately 620 customers travel southbound. We have identified surplus capacity between Newington Causeway and Borough High Street, where a combined frequency of 33.5 buses per hour is provided by routes 35, 40, 133 and 343 in the busiest hour and a frequency of 18 buses per hour are required to meet demand.

Approximately 1,250 customers travel on routes 45, 63 and 388 on the Elephant & Castle to Blackfriars Road in the busiest hour. Our data has shown us that we have surplus capacity currently provided on the Blackfriars Road – Farringdon Street corridor. A maximum of 17 buses per hour during the peak are required, while 22 are currently scheduled across routes 45, 63 and 388.

The busiest point on route 388 is at Brick Lane towards Stratford City in the evening peak where 4.9 buses per hour are required. Demand on route 388 is largely focussed to the east of Liverpool Street. Approximately 7,500 customers travel on the section between Liverpool Street and Stratford, whereas 1,300 customers travel within the section between Liverpool Street and Blackfriars, and between this area and the section to the east of Liverpool Street. A further 3,200 customers travel within the section between Blackfriars and Elephant & Castle and between this section and the rest of the route.

Surplus capacity is currently provided on the Blackfriars Road – Farringdon Street corridor, where a combined frequency of 22 buses per hour is provided on routes 45, 63 and 388 and a frequency of 17 buses per hour is required to meet demand.

Surplus capacity is currently provided on the Newington Causeway – Borough High Street corridor, where a combined frequency of 33.5 buses per hour is provided on routes 35, 40, 133 and 343 in the busiest hour and a frequency of 18 buses per hour is required to meet demand.

Demand on route 388 is largely focussed to the east of Liverpool Street. Approximately 7,500 customers travel on the section between Liverpool Street and Stratford, whereas

1,300 customers travel within the section between Liverpool Street and Blackfriars and between this area and the section to the east of Liverpool Street.

A further 3,200 customers travel within the section between Blackfriars and Elephant & Castle and between this section and the rest of the route. Route 388 has suffered with reliability issues since its extension to Elephant & Castle in part due to variable traffic conditions on Blackfriars Road and Blackfriars Bridge.

The total cost of operating the RV1 is about £3.3 million per year. Fares revenue is about £650,000 per year, meaning there is a subsidy of £2.6 million a year for the route, about £3.23 for each customer journey. Usage has fallen from c. 25,000 customers per week in March 2016 to c.17,000 per week during the summer of 2017. Our review has shown us that usage of the RV1 is now running at about 70 per cent of the previous year. The forecast for the change in usage following the frequency decrease was about 60 per cent of previous levels but it takes about a year for full effects to be realised. As such the change is in line with forecast decrease in usage on the route.

We have provided a complete report on the RV1 which is available on our website [here](#).⁶

Our proposals

To better match capacity to demand we propose:

- Change route 45 so it no longer runs between Elephant & Castle and King's Cross
- Introduce an extra morning journey to St Bartholomew's Hospital on route 46
- Change route 388 so it no longer runs between Liverpool Street station and Elephant & Castle, and decrease its frequency from every 10 minutes to every 12 minutes
- Change route 40 so it no longer runs between Elephant & Castle and Aldgate but instead extend it to Clerkenwell Green
- Increase peak frequencies on route 35 to buses from every 10 minutes to every 7-8 minutes, as well as introducing an additional return journey
- Extend route 343 from Tooley Street via Tower Bridge to Aldgate
- No longer run route RV1

Impact of change

These proposals will provide new connections between

Heygate Street/Rodney Road/Thurlow Street and Tower Hill/Aldgate. East Dulwich and Blackfriars Road If implemented these changes would realise a net saving of £2,065,000 per annum. These changes will remove a bus service from Fenchurch Street.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Fifteen per cent, 2,500 trips on route 40
- Thirteen per cent, 2,700 trips on route 45
- Twenty-nine per cent, 3,550 trips on route 388
- Forty-four per cent, 1,750 trips on route RV1⁷

⁶ A complete report on the RV1 is available here: https://consultations.tfl.gov.uk/buses/central-london/supporting_documents/routerv1reviewofusageandserviceplanning.pdf

15. Blackfriars and London Bridge – Route 100

Route 100 operates between London Wall, Museum Of London and Shadwell Station. Over the last three years, daily usage has decreased by 46 per cent to approximately 2,830 journeys on Mondays to Fridays. Usage has also decreased, by 38 per cent to approximately 1,660 journeys on Saturdays, and by four per cent to approximately 1,140 trips on Sundays.

The busiest point is Vaughan Road in Wapping where four buses per hour are required to meet demand during the morning peak towards the Museum of London, five buses per hour are provided. Our data also demonstrates that our proposal to withdraw the 388 between Elephant & Castle and Finsbury Square will see demand on Vaughan road increase.

In a 2017 public consultation to change route 100 so it terminated at Museum Of London, a number of stakeholders requested that the route end at St. Paul's station, instead of Museum Of London.

At the time no additional stand space was available at St. Paul's, which meant we were unable to make this change as requested by people responding to the public consultation. However, our proposed changes to route 242 would free-up stand space to allow the extension of route 100 to go ahead.

Our proposal

- Extend route 100 from the Museum of London to St. Paul's station, King Edward Street

Impact of change

Our proposal is dependent on our proposed changes to route 242 progressing, however, if implemented extending route 100 to St Paul's station would create a new link to St. Paul's Station, improving the interchange for onward travel at St. Paul's. Proposed changes would increase revenue by £22,000 per annum.

Extending route 100 from Museum of London to St. Paul's station adds an extra two to four minutes to journey time. As the route currently has good reliability, and there is room within existing resources to make this change without greatly increasing overall journey times, we have no concerns about negative impacts on the reliability of this route due to this change.

Due to highway constraints in Shadwell and Wapping, single deck buses will be specified.

16. London Bridge to Hackney Road – Routes 26, 48 and 55

Routes 26, 48 and 55 and all run between Hackney, Well Street and Shoreditch High Street

- Route 26 runs between Hackney Wick, and Waterloo
- Route 48 runs between Walthamstow Central and London Bridge
- Route 55 runs between Leyton Bus Garage and Oxford Circus, Harewood Place
- Route N55 runs between Oxford Circus, Harewood Place and Woodford Wells

⁷ This relates to the number of trips affected that can not be made on other routes

Routes 48 and 55 parallel each other between Lea Bridge Road, Bakers Arms and Shoreditch High Street. Route 26 parallels route 48 between Hackney, Well Street and Bishopsgate, and route 55 between Hackney, Well Street and Shoreditch High Street.

Across routes 26, 48 and 55 up to 18.1 buses per hour are required in the morning peak hour at Hackney Road towards central London, 22 are scheduled. During the evening peak across the same routes, 16.2 buses per hour are required traveling towards Hackney Central, 22 buses per hour are provided.

Across routes 48 and 55, a maximum of 8.3 buses per hour are required in the morning peak towards central London between Hackney Town Hall and Lea Bridge, 19 are scheduled. During the evening peak up to 7.4 buses per hour are required towards Lea Bridge Road on routes 48 and 55, currently 16 buses per hour are scheduled.

At the busiest point, nearly 60 per cent of all customers arrive and depart using route 55 during the busiest hour, making it the most popular service. The remaining 40 per cent of customers are evenly split between routes 26 and 48.

Route 48 is the only service that connects Walthamstow Central to central London via Bakers Arms. This generates nearly 5,000 direct customer journeys between Walthamstow Central and Shoreditch High Street.

The busiest point on route 26 is Hackney Road, Queensbridge Road towards Waterloo in the morning peak, where 4.6 buses are required to meet demand and six buses are scheduled. Route 26 experienced a drop in usage across all days over since 2013/14 with an 18 per cent decrease on weekdays, and a nine per cent decrease on weekends.

The busiest point on route 48 is Hackney Road, Queensbridge Road towards Walthamstow in the evening peak, where five buses per hour are required to meet demand, and six are scheduled. Since 2013/14 usage on route 48 has dropped by 21 per cent on weekdays, 17 per cent on Saturdays and 13 per cent on Sundays. With the exception of 2016/17 where usage was broadly stable, there have been consistent declines in usage.

The busiest point on route 55 is Hackney Road, Queensbridge Road towards Oxford Street in the morning peak, where 11.2 buses per hour are required to meet demand, 12 buses per hour are scheduled.

Our proposals

To better match capacity to demand:

- We will no longer run route 48
- Re-route the 55 away from Leyton High Road and extend to Walthamstow Central Bus Station via the current route 48 - this would maintain the link between Walthamstow Central and Central London
- Increase frequencies on the 26 to from every 10 mins to every 7.5 mins Monday to Saturday

Impact of change

Our proposals provide a total of 21 buses per hour on Hackney Road. They would retain a bus service between Walthamstow Central and Shoreditch High Street, with adequate capacity.

These proposals would release stand space at Leyton Green for future network planning and resilience.

If implemented, these proposals would realise a net savings of £2,662,000 per annum.

As a result of our proposals some customers would need to change bus, where previously their journey was direct. This will affect:

- Eighteen per cent, 4,000 trips on route 48⁸

A total of 2,300 of the route 48 customers originate from north of Hackney Central Station and the remaining 1,700 originate between Hackney Town Hall and Cambridge Heath Station. Customers wishing to travel towards London Bridge would need to walk 200 metres along Shoreditch High Street and interchange using routes 35, 47 or 149.

17. Holloway Road – Route 271 Night Service

Route 271 runs 24 hours a day between Highgate and Finsbury Square. The busiest point on the night service is at Old Street roundabout on weekend nights when 0.7 buses are required, 2 buses are scheduled.

Our proposal

- Withdraw the night service on all nights

Impact of change

Removing the service would mean that Canonbury Road, and part of New North Road and Highgate Hill would not be served directly by the night bus network. The number of weeknight customers who board and alight at affected stops are:

- Canonbury Road – 30 trips
- New North Road – 27 trips
- Highgate Hill – 42 trips

Customers who board and alight on New North Road are within 400 metres of alternative night routes on the southern section of New North Road and Essex Road. Customers on Canonbury Road are within 400 metres of night routes on Essex Road, St Paul's Road and Upper Street.

Customers on Highgate Hill are within 400 metres of night routes at Archway and Highgate Village; apart from 9 of the 42 boarders and alighters who are within 650 metres of other services.

This proposal would realise a net savings of £190,000 per annum.

Our proposal will require 69 per cent, 160 customers on weeknights to change bus, where their previous journey was direct.⁹

⁸ This relates to the number of trips affected that can not be made on other routes

⁹ This relates to the number of trips affected that can not be made on other routes

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Appendix 3

Proposed Changes to Bus Services in City of London in detail

Bus route number 4 currently runs from Archway through part of the City using Goswell Road, Aldersgate Street, St. Martin's Le Grand, Cheapside, New Change, Cannon Street, St. Paul's Churchyard, Ludgate Hill and Fleet Street, before heading out to Waterloo. The proposals would remove the section of route running from St. Paul's Churchyard to Waterloo and instead replace it with a new section running from New Change into Cannon Street, Friday Street then Queen Victoria Street to Blackfriars.

Bus route number 26 runs from Hackney to Waterloo, through the City along Norton Folgate, Bishopsgate, Threadneedle Street, Queen Victoria Street, Cannon Street, St. Paul's Churchyard, Ludgate Hill, and Fleet Street, then heading on to Waterloo. The proposals would increase the frequency of this service from every 10 minutes to every 7.5 minutes, Monday to Saturday.

Bus route number 35 runs from Clapham Junction to Shoreditch, through the City along London Bridge, King William Street, Gracechurch Street, Bishopsgate, Norton Folgate and on to Shoreditch. The proposals would increase the peak frequencies of this route to every 7.5 minutes.

Bus route number 40 runs from Aldgate to Dulwich, through the City from Dukes Place at Aldgate along St. Botolph Street, Middlesex Street, Aldgate High Street, Fenchurch Street, Gracechurch Street, King William Street and across London Bridge to head to Dulwich. The proposals would change this route to run from Clarkenwell through the City along Farringdon Street, New Bridge Street and over Blackfriars Bridge before re-joining the previous route at Elephant and Castle then head to Dulwich.

Bus route number 45 runs from Kings Cross to Clapham, through the City along Farringdon Street, New Bridge Street and over Blackfriars Bridge to Clapham. The proposals would remove the section of the route entirely and the route 45 would only run from Elephant and Castle to Clapham.

Bus route number 48 runs from Walthamstow to London Bridge, through the City along Norton Folgate, Bishopsgate, Gracechurch Street, King William Street, across London Bridge to London Bridge Station. The proposals would remove this route completely.

Bus route number 67 runs from Aldgate Station out of the City along Aldgate High Street before continuing on its route to Lordship Lane, Wood Green. The proposals would shorten this route, so that it runs from Lordship Lane to Dalston Junction, which would remove the City this section of the route.

Bus route number 76 runs from Tottenham Hale to Lower March by County Hall, through the City along Moorgate, Princes Street, Queen Victoria Street, Cannon Street, St. Paul's Churchyard, Ludgate Hill, Fleet Street and into Strand. The proposals would re-route this bus from Moorgate into London Wall, Aldersgate Street, St. Martin's-le-Grand, New Change, then back into Cannon Street where it resumes its usual route.

Bus route number 100 runs from Shadwell to London Wall (museum of London), through the city along Minories, Goodmans Yard, Mansell Street, Middlesex Street, Minories, St. Botolph Street, Dukes Place, Bevis Marks, Wormwood Street, London Wall to the Museum of London. The proposal would extend this from the Museum of London to St. Paul's Station along Aldersgate Street and St. Martin's-le-Grand.

Bus route number 149 runs from Edmonton to London Bridge bus station, through the City along Norton Folgate, Bishopsgate, Gracechurch Street, King William Street and across London Bridge to London Bridge Bus Station. The proposals would see the route remain unchanged, however, the frequency of the service would increase in the middle of the day on Mondays to Saturday from every 8-9 minutes to every 6 minutes. Evenings and Sunday services would decrease from every 8 minutes to every 10 minutes.

Bus route number 172 currently runs from Clarks Green to Brockley, through the City from Clarks Green using Farringdon Street and Fleet Street before heading onto Waterloo and beyond. The proposals would remove the section of this route from Clarks Green to Fleet Street, which will remove the entire City section of this route.

Bus route number 242 runs from Homerton to King Edward Street near St. Paul's, through the City from Shoreditch High Street along Norton Folgate, Bishopsgate, Threadneedle Street, Poultry, Cheapside then into King Edward Street near St. Paul's Station. The proposals would remove the City section of the number 242 route listed above and replace it with a new section that will run outside of the City from Shoreditch High Street into Commercial Street, then into Whitechapel High Street before entering the City along Aldgate High Street and finishing at Aldgate Station. The proposals will also decrease the frequencies of this service on Monday to Saturday daytimes from every 7-8 minutes to every 10 minutes, and in evenings and on Sundays from every 6 minutes to every 12 minutes. However, an extra peak journey will be introduced on the Liverpool Street to Shoreditch to Kingsland Road section.

Bus route number 341 currently runs from County Hall to Upper Edmonton, through part of the City using Fleet Street / Fetter Lane / New Fetter Lane / Holborn and then out onto Grays Inn Road. The proposals would change this route to Fleet Street / Farringdon Street, then Farringdon Road before rejoining the previous route at Roseberry Avenue. This means that Fetter Lane, New Fetter Lane and Holborn will not be served by the 341 bus route.

Bus route number 343 runs from New Cross to City Hall, without running through the City at all. However, the proposals would extend the route from City Hall across Tower Bridge and into the City along Minories to Aldgate High Street. The return route would use Minories, Goodman's Yard and Mansell Street to get to Tower Bridge.

Bus route number 388 runs from Stratford to Elephant and Castle through the City along Norton Folgate, Bishopsgate, Wormwood Street, London Wall, Aldersgate Street, St. Martin's-le-Grand, New Change, Cannon Street, Friday Street, Queen Victoria Street and then onto Blackfriars Bridge before heading to Elephant and Castle. The proposals would see this route terminate at Wormwood Street (Liverpool Street bus station) rather than Elephant and Castle. However, this route will temporarily terminate at Finsbury Circus until Liverpool Street bus station opens in 2019. The route frequency would also decrease from every 10 minutes to every 12 minutes.

Bus route RV1 runs from Tower Gateway to Covent Garden, through the City along Minories, Goodman's Yard and Mansell Street, before heading out across Tower Bridge and continuing to Covent Garden. The proposals would remove this route entirely.

Additional Information: the proposals will also mean that two pairs of bus stops in Fenchurch Street would no longer be served by a bus route; however, they are within 300 metres of stops on Gracechurch Street, Leadenhall Street, and Eastcheap and Great Tower Street.

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Appendix 4

Proposed changes to the numbers of buses per hour on City's streets (in each direction where applicable)

Road Name	Current number of buses per hour	Proposed Change in number of buses per hour (each direction)
Blackfriars Bridge	20	-4.5
New Bridge Street	14	+1.5
Farringdon Street	26	+1.5
New Fetter Lane	6	-6
Fleet Street	39.5	-4
Ludgate Hill	39.5	-4
Queen Victoria Street (West Mansion House)	6	0
Queen Victoria Street (East Mansion House)	20	+6
Holborn Viaduct	24	0
Bishopsgate (North Liverpool Street)	95	-12.5
Bishopsgate (South Liverpool Street)	61.5	-11
New Change	24	+2
Cheapside	26	-8
Southwark Bridge	8.5	0
Cannon Street	44	0
Great Tower Street	7.5	0
London Wall (West of Moorgate)	11	+2
London Wall (East of Moorgate)	11	-6
Aldersgate	15	0
Beech Street	5	0
Moorgate (North of London Wall)	33	0
Moorgate (South of London Wall)	33	-8
Leadenhall Street	8	0
King William Street	25	0
London Bridge	120	-11.5
Old Broad Street	17	0
Fenchurch Street	7.5	-7.5
Dukes Place / Bevis Marks	31.5	-0.5
Cornhill	?	0

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PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
1.	9 January 2018 23 January 2018 26 March 2018 8 May 2018 29 May 2018 10 July 2018 26 July 2018 11 Sept 2018 8 Oct 2018	<p>Ludgate Circus</p> <p>The Director of the Built Environment advised that an additional letter would be prepared as a matter of urgency, and gave her assurance that the issue would be treated as a priority.</p>	Steve Presland / Ian Hughes	Further meeting to be scheduled in DECEMBER 2018/early 2019 following installation of cycle SCOOT.	<p>Completed – Letter sent on 9 January and circulated to Members on 10 January.</p> <p>Meeting between Chairman, Deputy Chairman and TfL representatives took place on Tuesday 23rd January to discuss this issue.</p> <p>The meeting between TfL and CoL safety officers to conduct H7S audit (informal) needs to take place prior to committee and the data exchange be completed.</p> <p>Data was exchanged, and CoL have provided written comments back to TfL on their data just before the Easter break. We would expect TfL to respond within the next two weeks.</p> <p>Following a further meeting with TfL in the following</p>

					<p>actions were agreed:</p> <ul style="list-style-type: none">• TfL Road Safety Auditor to produce collision 'stick diagrams' for the Ludgate Circus junction to identify any prominent accident types.• CoL requested official TfL presence from Enforcement Team to assist in undertaking cycle behaviour training at the junction.• CoL highlighted that it would be beneficial to understand the number of informal / formal movements being undertaken at the junction and by what mode e.g. pedestrian, cycle, car. This will require surveys being conducted on the Ludgate Circus junction. Furthermore, as there is no data prior to the construction of this junction a secondary junction of similar nature will be required to be surveyed
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					<p>to provide a comparison. TfL to investigate practicality and cost of surveys and report back.</p> <p>UPDATE: Members informed at 8 Oct meeting that updates had been received from TfL on their actions as follows:</p> <ul style="list-style-type: none">• Collision diagrams had been provided and these highlighted that the main cause was left turning vehicles in conflict with pedestrians crossing informally.• TfL agreed to allow the City to use their Enforcement Team to assist in undertaking cycle behaviour training at the Ludgate Circus Junction.• TfL agreed to look in to the cost of surveys on the junction and report back.• A review of signal timings at the junction would take place in the next few months.
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					City Officers to continue to press TfL to identify ways in which these informal crossing routes could be made safer and more pedestrian friendly.
2.	9 January 2018 23 January 2018 20 February 2018 26 March 2018 8 May 2019 29 May 2018 10 July 2018 26 July 2018 11 Sept 2018 8 Oct 2018	Lane Rental In response to a question concerning 'lane rental', officers advised that the Government was currently consulting on this initiative and undertook to report back to the Committee following the outcome of this.	Ian Hughes	DECEMBER COMMITTEE	The consultation has now closed and DfT are analysing the feedback. As a minimum, they will need to publicise a decision before the current Lane Rental trials with TfL and Kent County Council expire in March 2019. UPDATE: DfT have now published their guidance on such schemes – Officers to report in Dec on the implications.
4.	9 January 2018 20 February 2018 26 March 2018 29 May 2018 10 July 2018 26 July 2018 11 Sept 2018 8 Oct 2018	Blackfriars Bridge Underpass A Member expressed concern regarding the poor state of the underpass at Blackfriars Bridge and asked who was responsible for the cleaning and maintenance of it. Officers advised that there were overlapping responsibilities between the	Steve Presland	ONGOING	A detailed response was sent to the Member on 09/01/2018. The City are Monitoring it, increasing inspections, scheduled and adhoc cleaning as required is now in place. Put a request in with TfL with a view to arranging a site meeting to agree an allocate clear responsibilities and explore CoL taking over TfL responsibilities.

		<p>CoL and TfL and discussions were taking place with TfL to address the problem.</p> <p>A Member questioned why Transport for London were reluctant to allow the CoL Corporation to take over responsibility for the underpass and asked if officers had engaged at a senior level.</p> <p>Members expressed concern at the state of the underpass and the fact that people were likely to try and cross the road as an alternative to using it which was extremely dangerous.</p>			<p>Officers undertook to report back on the options available.</p> <p>Members noted Officers had reached an agreement with TfL who had agreed to replace the tiles in the Blackfriars Bridge underpass and review the lighting there. Officers would undertake a deep cleanse of the underpass and invite local ward Members and the Chairman and Deputy Chairman of the Port Health and Environmental Services Committee to visit. Members could then consider whether a programme for routine deep cleansing of the underpass would be feasible going forward.</p> <p>UPDATE: Members were informed that TfL had undertaken tar repairs in the underpass and that a deep clean of the area had been undertaken by City Highways. TfL had undertaken to look at the issue of rough sleeping here alongside the City's outreach team.</p> <p>New LED lighting was also to be installed in the underpass.</p>
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5.	26 March 2018 9 May 2018 29 May 2018 10 July 2018 26 July 2018 11 Sept 2018 8 Oct 2018	<p>Wind Measurement on Tall Buildings</p> <p>Question – when will the promised "before and after construction" wind measurements on 20 Fenchurch St be made available.</p> <p>Officers advised that a number of extra trees had been planted outside 20 Fenchurch Street and agreed to produce a full report in due course of relevant and predicted readings.</p>	Gwyn Richards	December 2018	UPDATE: A report to be brought to the December meeting of the Committee.
6.	26 July 2018 11 Sept 2018 8 Oct 2018	<p>Fumes</p> <p>A Member recognised that where there were occasions when the design of a particular building indicated ground level kitchen vents, planning conditions on how any smells would be dealt with were typically placed on these. However, he felt that there were occasions where smells still caused a problem despite this and questioned whether, in such</p>	David Horkan/Rachel Pye	November 2018	Planning and Environmental Health to produce a report to Committee on the standards and procedures for dealing with the extraction of fumes to restaurants & cafes?

		circumstances, those conditions were checked and / or how did Officers enforce them?			
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