



Local Plans Sub (Planning and Transportation) Committee

Date: FRIDAY, 6 OCTOBER 2017
Time: 1.45 pm
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: Christopher Hayward (Chairman) Paul Martinelli
Deputy Alastair Moss (Deputy Alderman Gregory Jones QC
Chairman) Susan Pearson
Randall Anderson Dhruv Patel
Marianne Fredericks

Enquiries: Amanda Thompson
amanda.thompson@cityoflondon.gov.uk

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

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**
2. **MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To approve the minutes of the last meeting held on 22nd September 2017.
(TO FOLLOW)
4. **CITY OF LONDON LOCAL PLAN REVIEW: DRAFT CITY PLAN 2036**
Report of the Director of the Built Environment.

For Decision
5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

For Decision
(Pages 1 - 28)
6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

Committee(s)	Dated:
Local Plans Sub (Planning and Transportation) Committee	6 th October 2017
Subject: City of London Local Plan Review: Draft City Plan 2036	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Adrian Roche, Department of the Built Environment	

Summary

This report sets out a series of short discussion papers relating to key policy issues that will need to be addressed in the Local Plan. The views expressed by the Sub-Committee will be used to help inform the development of detailed policies on these topics. Further meetings of the Sub-Committee will be arranged later in the autumn to consider the proposed vision, objectives and policies for the Draft Local Plan.

Recommendations

Members are recommended to:

- Note the contents of this report and appendices; and
- Advice on the questions and proposals set out in appendices 1-6 to inform the preparation of the Draft City Plan 2036.

Main Report

Background

1. The previous meeting of the Sub-Committee on 22nd September 2017 heard an update on progress with the Local Plan review and agreed the broad approach that the Sub-Committee would take to the task of scrutinising the emerging Draft Local Plan. The Sub-Committee agreed that the structure of the Draft Local Plan should be based on the structure of the Draft Corporate Plan, and it reached some initial conclusions about the areas of the City which should be subject to spatial policies in the Draft Local Plan.
2. At the meeting on 22nd September 2017, the Sub-Committee also considered a paper which summarised in broad terms the potential policy approaches which could be taken in relation to office development and the protection of offices in the Draft Local Plan. The main purpose of this meeting is to consider a series of further papers relating to key policy issues that will need to be addressed in the Local Plan.

Key policy issues

3. Attached to this report as Appendices 1-6 are a series of short discussion papers that relate to the following topics:
 - Visitors and Culture;
 - Housing;
 - Public Transport, Movement and Healthy Streets;
 - Environmental Responsibility and City Greening;
 - Smart City and Utilities; and
 - Resilience
4. Each paper highlights a small number of key questions for consideration by the Sub-Committee. The views expressed by the Sub-Committee will be used to help inform the development of detailed policies on these topics.

Public Consultation

5. At the previous meeting on 22nd September, some concern was expressed about the relatively low level of response to the public consultation carried out at the Issues and Options stage of the Local Plan review in autumn 2016. It was pointed out that on past experience, there is likely to be a greater level of response when the Draft Plan is published, as this is the stage when individuals and organisations can see what the City Corporation is proposing and comment accordingly.
6. Nonetheless, officers are keen to explore some more innovative forms of consultation at the Draft Plan stage with the aim of reaching out to a wider audience. A report setting out a proposed consultation strategy for the Draft Plan will be presented to a future meeting of this Sub-Committee.
7. Members also expressed a desire to hold one or more of the future meetings of the Sub-Committee in a workshop format, potentially inviting key stakeholders when issues of interest to them are being discussed. Officers are considering how this might work and will update Members verbally at the meeting on 6th October.

Next steps

8. Further meetings of the Sub-Committee will be arranged to consider the proposed vision, objectives and detailed policies for the Draft Local Plan. It is likely that these meetings will take place in November and December, and potentially early in the New Year. The full Draft City Plan 2036 will then be reported to the Grand Committee and to the Policy and Resources Committee for approval to publish for consultation during the early months of 2018.

Corporate and Strategic Implications

9. The review of the Local Plan is being informed by the emerging draft Corporate Plan, as set out in this report, and will provide an opportunity to

complement key corporate objectives, such as developing Culture Mile and progressing the Future City agenda.

Implications

10. The costs of preparing and consulting upon the Draft City Plan 2036 will be met from existing staff resources and the Department's Local Risk Budget. The further preparation of the Plan beyond the Draft Plan stage, including the Public Examination, may require additional financial resources. This will be addressed in future reports to the Sub-Committee and Grand Committee.
11. Production of the Draft Plan will be supported by the production of an Integrated Impact Assessment (IIA). An IIA combines a number of assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment and a Habitats Regulation Assessment;
 - Equalities Impact Assessment; and
 - Health Impact Assessment.
12. The IIA is an integral part of the plan making process and will help inform the detailed policies. A Draft IIA report will be produced to support the Draft City Plan 2036.

Appendices

- Appendix 1 – paper on Visitors and Culture
- Appendix 2 – paper on Housing
- Appendix 3 – paper on Public Transport, Movement and Healthy Streets
- Appendix 4 – paper on Environmental Responsibility and City Greening
- Appendix 5 – paper on Smart City and Utilities
- Appendix 6 – paper on Resilience

Adrian Roche

Development Plans Team Leader

T: 020 7332 1846

E: adrian.roche@cityoflondon.gov.uk

This page is intentionally left blank

Appendix 1 – Visitors and Culture

1. This paper summarises the potential policy approaches which could be taken in relation to visitors, arts and culture.

Context

2. Cultural facilities and events in the City attract millions of visitors each year, complementing the City's business role and contributing to its vibrancy. The City's historic environment and its cluster of tall buildings also attracts many visitors who come to enjoy the historic urban form, heritage assets and innovative modern architecture. There are now approximately 30 hotels in the City, with a cluster emerging near the Tower of London in recent years.
3. The context within which the City's cultural infrastructure operates has changed in recent years. There has been a growing recognition of the role that culture can play in creating an attractive and vibrant environment that will attract businesses and workers to the City. Cultural activities are increasingly seen as an important part of the City's world class offer to business and workers. Transport infrastructure such as Crossrail will bring increasing numbers of people into the City, as will the steady rise in visitor numbers both internationally and from the U.K.
4. Culture Mile aims to create a vibrant area which will capitalise on the existing cultural offer in the Barbican and surrounding area, with the relocation of the Museum of London to Smithfield and the proposed development of a Centre for Music on the Museum's current site being the key projects. The Beech Street/Long Lane axis is seen as instrumental to the creation of a more welcoming environment with a mix of supporting uses, including shops, restaurants and pop-up installations.

Current policy position

5. The current Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences. Policy DM 11.3 allows hotel development where it would not prejudice the business function of the City. The London Plan identifies the Barbican area as a strategic cultural area within London.
6. The City of London Cultural Strategy is being refreshed, with a more outward looking stance and recognition of the pivotal role culture can play in the life of the City. The City's current Corporate Plan and the draft Corporate Plan for 2018-23 highlight the importance of culture and visitors in the City. The draft Corporate Plan recognises the Square Mile as a focal point for world-class creativity and culture under the theme of shaping the City of the future.

Culture Mile

7. Culture Mile is an ambitious initiative to create an internationally distinctive cultural and creative destination in the north west of the City. This raises issues for the new Local Plan, most notably the extent to which unique planning arrangements will be necessary and desirable to facilitate a distinctive look and feel. The draft Cultural Strategy refers to the potential need to develop a wider spatial masterplan for the area.
8. Although the draft Cultural Strategy refers to unique planning arrangements in the area of Culture Mile, the consequences of such an approach need to be carefully considered as it could create a precedent for similar policy changes in other parts of the City. There is also a need to ensure that the City's cultural offer is not confined to Culture Mile and is accessible to workers, residents and visitors across the City.
9. **The Sub-Committee is asked to comment on the extent to which the Local Plan should consider a specific policy approach within Culture Mile which would be different to other parts of the City.**

Hotel Development

10. The London Plan encourages the provision of hotel bedrooms to meet demands from international and national visitors, with a target of 40,000 to be achieved by 2036. Earlier this year the GLA published projections of demand and supply for visitor accommodation in London, which indicated that there is a need for an additional 4,000 hotel bedrooms in the City between 2015 and 2041. Given that there are approximately 3,000 hotel bedrooms in the development pipeline, this level of provision is considered to be achievable.
11. Hotels provide benefits to City businesses as well as the visitor economy, and they can represent a suitable alternative use particularly of historic buildings. However, there has been concern that hotel development in the City has the potential to displace office floorspace needed for providing an adequate range and type of accommodation to enable the business City to successfully operate. In the period between April 2011 and March 2017 the largest losses of office stock in the City were to hotel use, although proportionally this amounted to less than 1% of the City's total office stock.
12. The Sub-Committee is asked to comment on:
 - a. **whether the Local Plan should seek to restrict hotel development to the minimum necessary to meet GLA projections/targets, or whether it should adopt a more supportive policy approach; and**
 - b. **whether hotel development should be encouraged/restricted in certain areas of the City or whether this should be left to market demand.**

Cultural and Community Facilities

13. The current Local Plan seeks to protect visitor, arts and cultural facilities but does not specifically identify uses or facilities worthy of protection. There have been comments in response to consultation on the Local Plan and some recent development proposals to the effect that greater policy protection should be given to cultural and community uses that are valued by local people and/or have historic significance within the City. Examples cited include the Silver Vaults in Chancery Lane and historic public houses, but other City-related uses such as Livery Halls could be argued to be equally worthy of protection. The introduction of specific policy protection for such uses could limit the ability of landowners to bring forward redevelopment proposals.
14. **The Sub-Committee is asked to comment on whether it considers that the Local Plan should provide stronger policy protection for existing cultural and community facilities, and whether the policy should address the protection of uses which have a historic or cultural association with the City, such as Livery Halls or the Silver Vaults.**

This page is intentionally left blank

Appendix 2 – Housing

1. This paper summarises the potential policy approaches which could be taken in relation to residential development.

Context

2. The City has a long-standing residential community which adds vibrancy and character to the City and encourages vitality and supports retail businesses. The provision of additional housing in the City contributes to meeting the London wide need for housing, including the need for housing for City workers. Accommodation includes provision for permanent residents, temporary sleeping accommodation, student accommodation and housing for the elderly. Residential accommodation is concentrated in the City's housing estates at the Barbican, Golden Lane, Middlesex Street and Mansell Street estates. Accommodation outside the estates has been directed, through planning policy, to a number of identified areas around the edges of the City, to avoid locating accommodation where it could disrupt the City's business function.
3. The City's residential population is very small in comparison to the daily working population. The GLA's 2015 projections suggest that the City's population will increase from approximately 8,000 in 2014 to 9,705 by 2026. Although the housing stock has increased in recent years and stands at around 7,000 units, the residential population has not increased proportionately, due to many homes being used as second homes by people who consider their main residence to be outside the City.
4. The nature of London's residential market is gradually evolving, with inflated prices and lack of supply making it difficult for many people to get a foothold on the property ladder. There is an acknowledged need for more affordable housing across London. Alternative types of housing are emerging such as communal living arrangements with bedrooms, Pocket living flats which are well-designed but do not meet London Plan space standards and build-to-rent developments which provide purpose-built rental accommodation.

Current policy position

5. The current Local Plan seeks to protect existing residential accommodation and to meet the London Plan's former target for the City of 110 additional units per annum. This target has subsequently increased to 141 additional homes per annum (a figure that has yet to be incorporated into the City's Local Plan), and is likely to change again in the forthcoming Draft London Plan. New housing should be located on suitable sites in or near the residential areas identified in the Local Plan.
6. The current Local Plan seeks the provision of 30% affordable housing on-site. Alternatively, 60% affordable housing may be provided off-site, or equivalent cash-in-lieu, if it is demonstrated that on-site provision is not viable.

7. Policies seek to protect the existing housing stock and the amenity of existing residents, while ensuring office development is not compromised by residential development. There are also policies relating to housing standards, temporary sleeping accommodation and student housing.

Housing delivery

8. Housing delivery in the City is currently well ahead of the 141 units a year target and is likely to remain so in the next few years as a result of major schemes under construction, particularly the Barts Square and Sugar Quay developments. In the longer term, the capacity of the City to accommodate new housing may reduce, particularly as the stock of older domestic scale office buildings suitable for conversion or redevelopment to residential has diminished.
9. The Mayor has recently undertaken a review of London's Strategic Housing Land Availability Assessment (SHLAA) and this will form the basis for the revised housing targets set for the City and all the London boroughs in the forthcoming Draft London Plan. Draft targets from the SHLAA are due to be sent to the City and London Boroughs shortly.
10. At the outset of work on the new Local Plan, the City Corporation commissioned a Strategic Housing Market Assessment to consider future housing needs. This suggested that there is an annual need for 126 residential units a year. The Government has recently published a new national housing need methodology for consultation, and using this methodology the annualised housing need in the City would be 120 units a year, lower than the current target for the City in the London Plan.
11. **The Sub-Committee is asked to comment on whether it considers that a lower housing target should be sought from the GLA, or whether the Local Plan should seek to provide the minimum level of housing required by the London Plan, or whether there is any desire to provide more housing as a contribution to meeting London's wider housing needs.**

Affordable housing

12. While the current Local Plan indicates that affordable housing should be provided on site in line with London Plan policy, in practice it is almost always provided outside the City in neighbouring boroughs using cash-in-lieu payments from housing and office developments within the City. To date this approach has been accepted by the GLA as a sensible response to the scarcity of land and the high cost of developing housing in the City, but there are growing concerns at the failure to deliver new affordable housing on sites within the City.
13. The Mayor has recently published a new Affordable Housing and Viability SPG which places greater emphasis on the delivery of affordable housing on-

site, requires a higher contribution towards affordable housing of 35% and a tighter regime for the assessment of developer viability appraisals.

- 14. The Sub-Committee is invited to comment on whether the Local Plan should continue the current approach or provide a stronger policy steer requiring affordable housing to be provided on-site.**

Location and type of residential accommodation

15. The current Local Plan guides residential development to the ten areas considered suitable for housing, based on minimal disruption to the business City and the expectation that clustered accommodation can benefit from better amenity and access to services. This approach has been largely successful, although it has proved difficult to eliminate disturbance to residents in the designated areas from facilities serving the night-time economy.
16. An issue for the new Plan is whether we should continue to cluster residential accommodation in specified areas or whether it should in principle be allowed throughout the City. Current policy also prevents permanent residential accommodation from being provided in the same building with other land uses.
- 17. The Sub-Committee is asked to comment on whether housing development should continue to be focused in the identified residential areas, or whether there is any desire to be allow residential units to be provided in other parts of the City perhaps within mixed-use developments?**
- 18. The Sub-Committee is also invited to comment on whether the Local Plan should provide greater protection for residential amenity (including noise and daylight and sunlight) and how this can be achieved whilst also delivering the aims of a business City and an increasingly active night-time economy.**
19. In terms of the types of housing required, the City's SHMA indicates a need for both housing suitable for families and for smaller households. The Local Plan will also need to consider whether specific provision should be made for older people and for students. The Plan will also need to consider the approach to short-term lettings. Legislation allows homeowners to let their properties for up to 90 days in a calendar year without the need for planning permission. Beyond 90 days permission is required. Current policy restricts short-term lets and does not allow a mix of short-term lets and permanent residential within the same building.
- 20. The Sub-Committee is asked to comment on whether the Local Plan should seek to meet specific housing needs and whether a more flexible approach should be taken to short-term lets.**

This page is intentionally left blank

Appendix 3 - Public Transport, Movement and Healthy Streets

1. This paper summarises the potential policy approaches which could be taken in relation to movement and transport in the City.

Context

2. To maintain its role as the world's leading financial and business centre, the City needs to keep moving. The transport demand in the City is high as 90% of City employees use public transport or active modes of travel to commute, and the City's workforce is projected to increase further. The City has the highest density of public transport provision in Britain and is part of an extensive regional public transport network.
3. Transport and the public realm is vital to the City's connectivity so we need to maximise their potential in order to ensure a permeable and accessible City that is safe and easy to move around within.
4. The nature of movement and transport in the City is evolving; with a rapid increase in more sustainable travel patterns and modes of transport such as cycling. It is important to ensure transport systems can accommodate the demands of different types of movement and the overall volume of use safely.

Current policy position

5. The current Local Plan contains a range of policies that aim to further improve the sustainability and efficiency of travel in, to, from and through the City. The policies seek to enhance the environment for pedestrians, cyclists, public transport users and for essential motor vehicle users. Improving safety, accessibility and inclusivity are sought through the Local Plan policies and the development of area-based enhancement strategies.
6. The Local Plan currently safeguards land for Crossrail and the Bank Station/Northern Line upgrade. It also reflects the Mayor's safeguarding direction for use of Walbrook Wharf as a waste handling site and as a river wharf. It specifies that new 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. The current Local Plan also includes some local cycle parking standards and sets out which developments will need to be supported by Transport Assessments and Travel Plans.
7. The City is preparing a Transport Strategy which will set out policies and proposals for managing all forms of transport in the City and complement the Mayor's Transport Strategy. This Strategy will be able to deal with a range of issues which are beyond the scope of the

Local Plan, but the Local Plan will need to provide a framework for dealing with the transport implications of new development, including matters such as freight and servicing and cycling provision.

Public Transport

8. The Draft Mayor's Transport Strategy is currently out for consultation, with a final version due to be published in 2018. This strategy aims to change the way people choose to travel so that, by 2041, 80% (today 64%) of all Londoners' trips will be made on foot, by cycle or by public transport.
9. The London Plan sets out that London's Transport should have an efficient and effective transport system which actively encourages more walking and cycling and makes better use of the River Thames.
10. The completion of Elizabeth Line (Crossrail) Stations in 2018/19 will result in increased numbers of people on the City's streets. The Northern Line/Bank Station upgrade and completion of the Thameslink programme will also add capacity to the City's public transport network.

Movement & Healthy Streets

11. There was clear support at the Issues and Options consultation for improving connectivity and sustainable transport, improving public transport, and encouraging both walking and cycling. There was also support for restrictions on vehicular movements in some areas and at certain times and public realm enhancements.
12. Air quality concerns within the City and across London are helping to drive a take up of alternative fuelled vehicles, including electric cars, buses and taxis. The Mayor will introduce an Ultra-Low Emissions Zone in London in 2020. From 2018 all new taxis will need to be zero emission capable and requirements for zero emission private hire vehicles will be introduced. Meeting the Mayor's ambitions will require the provision of new infrastructure, including off-street, and potentially on-street, electric vehicle charging points. Detailed policy considerations will be addressed in the emerging City Transport Strategy and the Mayor's Transport Strategy, but the Local Plan will also need to provide a framework for requiring the necessary infrastructure through new development.
13. **The Sub Committee is asked to comment on the extent to which the Local Plan should support the installation of electric vehicle charging points, both off-street and on-street, in the City?**
14. The City of London Freight & Servicing SPD was published for consultation between 7th August and 30th September 2017 and provides guidance that supports the policies in the current Local

Plan. Further development and intensification will increase demand for the movement of goods into and out of the City, and minimising the impact of delivery and servicing trips is therefore a significant challenge. The draft SPD proposes a number of changes to the way that deliveries and servicing are carried out, including the potential for re-timing deliveries so they do not impact on the working day. Changes to the Local Plan could facilitate further innovation in servicing and deliveries and provide the policy framework for requiring change from City developers.

15. **The Sub Committee is asked to indicate whether it wishes the new Local Plan to go further than the existing Plan in terms of requiring off-peak servicing and deliveries, including night-time deliveries outside the main residential areas.**
16. Further intensification of development in the City will result in increased numbers of workers coming into the City on a daily basis. The opening of Elizabeth Line stations will increase pedestrian footfall from these stations to other parts of the City. Investment in the City's cultural offer through Culture Mile and other initiatives will also attract greater number of visitors. The increased activity will result in increasing numbers of pedestrians on City streets and measures will be needed to provide safe and attractive walking routes. This could include a greater emphasis in the Local Plan on permeability in new buildings, requiring public access to the ground floor, creating new pedestrian routes through buildings and timed closures of the most congested streets.
17. **The Sub Committee is asked whether it would support stronger policies to promote and require permeability in new developments.**
18. The Bank on Safety scheme has highlighted the significant change that can be delivered through innovative transport measures. Timed closure of the junction has reduced traffic levels, increased the capacity for pedestrians, improved local air quality and reduced noise. Bank Junction has the potential to deliver a major new public space at the heart of the City. Similar approaches elsewhere in the City equally have the potential to deliver significant improvements whilst not adversely affecting the City's business function.
19. **The Sub Committee is asked to consider whether the Local Plan should promote further timed closures, where appropriate, of City streets.**
20. In recent years there has been a significant growth in cycling in the City, driven in part by the Mayor's policies to promote cycling, including through the creation of new Cycle Super Highways. City occupiers are demanding additional provision for cycle parking and associated facilities within new developments to meet the demands

of their workforce. More facilities are required to accommodate the rapid growth in cyclists within the City in order to enable safe and responsible cycling whilst retaining road capacity for other users. On-site cycle parking must be provided in all developments, including for visitors to developments. Further provision is likely to be required on-street, but there is potential for conflict with the aim of reducing street clutter to facilitate pedestrian movement.

21. **The Sub Committee is asked whether the Local Plan should promote further provision of cycling facilities, such as requiring developers to submit a cycling plan detailing how they will meet needs within and around their buildings.**

Appendix 4 – Environmental Responsibility and City Greening

1. This paper summarises the potential policy approaches which could be taken in relation to environmental responsibility and City greening.

Context

2. The main driver for sustainable development is climate change, 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 which positively addresses environmental challenges.
3. Social and environmental responsibility is high on the agenda for the emerging millennial workforce; therefore a working environment that supports these goals is essential to attract the City's future businesses.
4. The London Plan and the Mayor's Sustainable Design and Construction SPG provide a framework for taking forward this agenda but this must be implemented at a local level taking account of the City's specific circumstances.

Current policy position

5. The current Local Plan has a suite of policies which promote sustainable development, environmental protection and resilience to climate change. Alongside this, policies on waste and flood risk detail how the City Corporation is fulfilling its statutory duties as Waste Planning Authority and Lead Local Flood Authority.

Environmentally Responsible Design

6. BREEAM assessments and energy strategies are the main tools used by developers and local planning authorities to assess the impacts that development will have on the environment. Current City Local Plan policy has been successful in achieving BREEAM "Excellent" ratings for the City's buildings, and energy strategies demonstrate increasingly energy efficient and low carbon building designs.
7. We will continue to require BREEAM "Excellent" or "Outstanding" for the City's buildings but may wish to develop more specific greening and smart energy policies for the City. Current London Plan Policy requires all new residential development to be zero carbon now and this will be extended to cover commercial buildings from 2019, subject to the London Plan review. Where developments are unable to fulfil these targets on-site, a contribution to the City's Carbon Offsetting Fund will be required. This fund will be ring-fenced for carbon reduction projects elsewhere.
8. Carbon reduction must be achieved whilst avoiding negative air quality impacts, ultimately leading to a Zero Emissions City. A trajectory to zero

emissions would identify where technology, behaviour changes and policy interventions will contribute and what part new development and infrastructure should play in this. The City's Carbon Offsetting Fund could be used to support strategic projects which help reduce energy use and carbon emissions in line with the trajectory.

9. **The Sub Committee is asked to endorse a strategic approach which sets a trajectory to achieve a Zero Emissions City and continues to require high environmental standards for the City's buildings.**
10. It is imperative that greening, smart energy solutions and resilience to flooding and overheating are designed into the City's buildings and public realm from the outset of the design process rather than being considered when designs are already decided and it is more difficult to make changes. To facilitate this, it is proposed that these issues be incorporated into the building design policies within the Plan.
11. **The Sub-Committee is asked whether it agrees that the design policies should incorporate environmentally responsible design rather than including a separate set of policies on climate change and sustainability.**

Urban Greening

12. Local Plan policies have been successful in securing green roofs throughout the City, an approach that has won a 2017 National Award for Excellence from the RTPI. Other forms of greening, however, are less common. A step change in greening of buildings would bring benefits for air quality, noise, temperature moderation, rainwater attenuation, biodiversity enhancement and the physical and mental health of workers, residents and visitors.
13. This could be achieved through a new policy requiring a certain proportion of greenery within new development. The Mayor's Draft Environment Strategy indicates that a new Urban Greening Factor (UGF)¹ for London is being developed for potential inclusion in the London Plan. UGF is a standardised method of assessing greening for different building types, which could be adapted to reflect the nature of development within the City.
14. **The Sub Committee is asked to indicate whether it supports an approach that would seek to deliver a significant increase in greening of the City's buildings and public realm.**

Waste Planning

15. As Waste Planning Authority (WPA) the City Corporation has a duty to plan for all waste that is generated in the City. This includes household,

¹ https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

commercial and industrial, construction and demolition, hazardous and radioactive wastes.

16. There is one safeguarded waste transfer site in the City at Walbrook Wharf but no waste treatment facilities, therefore Waste Planning Authorities elsewhere must provide facilities for treatment of the City's waste. Other Waste Planning Authorities are increasingly restricting waste management capacity to discourage imports of waste from outside their areas and to release brownfield land for other uses, such as housing.
17. Waste prevention and circular economy principles form an essential element of future waste management and must be considered in the design of buildings. This could include on site waste treatment, such as anaerobic digestion of food waste, in large developments, reducing the need for transport of waste off-site. This will enable City businesses to fulfil their Corporate Social Responsibility objectives and residents to play their part in waste minimisation.
18. **The Sub-Committee is asked to indicate whether it supports a Local Plan policy that would promote on-site waste treatment on major development sites.**
19. Co-operation with other WPAs is essential in planning for efficient and effective treatment of the City's remaining waste. The London Plan requires that the City identifies capacity to manage 100,000 tonnes of waste (subject to review) either in the City or elsewhere in London. The City Corporation has an agreement with the London Borough of Bexley to meet this apportionment within the current Plan period, and participates in a partnership arrangement of WPAs known as the South East London Joint Waste Planning Group. The NPPF requires Local Planning Authorities to co-operate on strategic planning matters including waste planning.
20. **The Sub-Committee is asked to endorse this co-operative approach to waste planning.**

This page is intentionally left blank

Appendix 5 – Smart City and Utilities

1. This paper summarises the potential policy approaches which could be taken in relation to Smart City and utilities provision.

Context

2. To support and maintain its role as the world's leading financial and business centre, the City needs to ensure provision of excellent utilities infrastructure. Total City employment is forecast to increase from 505,000 in 2016 to 575,000 by 2036. Furthermore, resident population is projected to rise to 10,400 by 2036, a 26% increase from 2016. This highlights the need for upgrading and expansion of the City's utility infrastructure.
3. The dense concentration of businesses means that high demand is focused in a restricted geographical area. Energy demands are increasing, particularly to provide upgraded ICT systems required by the City's financial and business services, and air conditioning to counter increased warming. The growth of electric powered vehicles, including zero emission taxis, will lead to further significant energy demands.

Current policy position

4. The current Local Plan seeks to facilitate the provision of new utilities infrastructure, to minimise the demand for power, water and other utility services, and to protect existing essential infrastructure. This is to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.
5. The policy highlights the need for capacity projections to take account of climate change impacts, as well as identifying a range of infrastructure requirements to be delivered alongside and prior to occupation of new developments in the City.
6. Developers are required to demonstrate that there will be utility infrastructure capacity both on and off the site, to serve the development during construction and operation. Developers are also required to utilise existing pipe subways where possible to avoid any further congestion of the sub-surface or lengthy disruption to the highway and street network

Utilities infrastructure provision

7. The City relies on a range of utilities to function as a global financial and business centre, and to meet the needs of its residents, businesses, students and visitors. However, the sub-surface is congested with cable routes which results in less space for accommodating new infrastructure.

8. With the City's need to be digitally well-connected and responsive, the demand for utilities infrastructure will inevitably increase. An assessment of a building's connectivity could be encouraged by requiring a wired certification such as WiredScore, which rates commercial buildings on their connectivity ranging from internet speed to mobile connections. It helps ensure that buildings will fit the needs of tenants today and in the future.
9. Current developments are required to provide basic infrastructure in terms of digital connectivity which then enable occupiers to install the actual connections after the building's completion. The Local Plan could require that full fit out be provided at the development stage so that buildings are ready to move into by potential occupiers. Although this would have benefits for occupiers, it could be difficult to implement in schemes that are not pre-let and where the specific requirements of the end occupier are therefore unknown at the time of completion.
10. The Sub-Committee is asked whether it agrees that the Local Plan should:
 - a. **Seek ways of securing high quality, innovative digital connectivity to ensure the City remains a world leading international financial centre;**
 - b. **Require the provision of digital infrastructure within new buildings prior to occupation, beyond that which is currently provided.**
 - c. **Introduce a wired certification to rate the connectivity of commercial buildings. If so, should this be Citywide or just focused in the Eastern City Cluster?**

Pipe subways

11. The current policy has had limited success because the costs associated with the construction of new pipe subways is considerable and they involve land that is usually not within the control of individual landowners.
12. While some funding of pipe subways could come forward through private investment, it is likely that public funding would be needed to significantly expand the current network. It is considered that the focus should therefore be on linking up existing pipe subways in the City to provide a strategic cohesive approach to utilities provision. The Local Plan could include a policy to require or encourage developments to link up to existing pipe subways where feasible.
13. **The Sub-Committee is asked whether it agrees that the Local Plan should require existing pipe subways to be utilised and linkages between pipe subways where feasible.**

Smart City initiatives

14. The rapid advancement of technology in areas such as robotics and artificial intelligence is likely to have profound impacts on all large cities. It is not possible as yet to fully understand what the implications will be for the City of

London, nor how such changes should be reflected in land-use policies. Ensuring that the City's utilities infrastructure is fit for purpose and forward looking, particularly in terms of IT connectivity, should provide the digital framework within which Future or Smart City innovation can take place. It is, therefore, considered that the new Local Plan should be supportive of the use of innovative technologies to address urban problems such as congestion and pollution, reflecting the leadership role which the City Corporation is taking on these issues.

15. **The Sub-Committee is asked to comment on the role that the Local Plan can play in stimulating and supporting the Future/Smart City agenda in the City.**

This page is intentionally left blank

Appendix 6 – Resilience

Context

1. Resilience is the idea of encapsulating all the potential risks to the City and trying to implement policy that would not only help to prevent these, but would also assist the City to recover from an incident as soon as possible.
2. Resilience can cover topics as far ranging as anti-terrorism, cyber-security, natural disasters, flood risk, and energy security. Many of the topics covered by the term resilience are beyond the realm of planning control in a narrow sense, but there are linkages and cross over with land-use issues on many subjects. This paper deals with some of the key elements underpinning resilience in the City and it is intended that these would be taken forward as a series of inter-related policies in the new Local Plan rather than as a single policy.

Current Policy Position

3. The current Local Plan addresses resilience across several different sections of the Plan. These include policy CS3 Safety and Security, which addresses issues around counter terrorism, traffic management and the night time economy.
4. Policy requires that mixed uses within the same development are self-contained. Developers are required to implement security measures recommended by the City of London Police and the City Corporation. Policy requires risk assessments to be produced for any new areas that have potential to become crowded and to assess the impacts that security measures might have on the public realm.
5. Night time economy issues are also addressed within wider safety and security considerations in the Local Plan. The policy deals with issues regarding residential amenity and the requirement for Management Statements, seeking to differentiate between planning responsibilities and licensing responsibilities.
6. The current Local Plan seeks to minimise the risks of flooding from the Thames and from surface water or groundwater flooding. Sustainable Drainage Systems are also required on major new developments to help reduce rain water runoff.
7. Through planning policy the City looks to reduce energy use in new developments, promoting high levels of energy efficiency through requirement for high BREEAM ratings, as well as encouraging connection to decentralised energy and district heating.

Resilience and Planning

8. Planning policy has a role to play in ensuring that the built environment contributes to a strong and resilient City. Existing policies have been successful in making buildings more secure and public areas safer but there is scope for policy to be better co-ordinated to ensure that the various components work together more closely.
9. There is a potential tension between the desire for the City to be resilient to risks whilst remaining an inclusive area that is a pleasant environment for workers, residents and visitors. Hostile vehicle mitigation, for example, can provide greater safety and security but this might be at the expense of pedestrian permeability and access.
10. **The Sub-Committee is invited to comment on how the balance between the aims of a resilient City and an inclusive City should be reflected in policy. Should there be a greater emphasis on requiring developers to provide resilience for their buildings and contributing to wider resilience in the public realm?**
11. The City's buildings, infrastructure and public realm must be resilient to the weather conditions likely to be encountered in the future. This could include more frequent heavy rain storms, periods of relative drought and warming exacerbated by the Urban Heat Island effect.
12. City greening has a major role to play in tackling these challenges but other design solutions such as solar shading and flood resilient layouts for buildings are equally important.
13. As Lead Local Flood Authority the City Corporation is responsible for the City's Flood Risk Strategy and is a statutory consultee on the SuDS and Drainage Plans for all major development. Concentrating on major development will have some impact but a more comprehensive approach to SuDs which encompasses smaller developments and the public realm could be more effective in safeguarding the future City from extremes of weather. This would, however, involve additional work processing the relevant applications.
14. **The Sub Committee is asked to comment on**
 - a. **whether the requirement for SuDS should be extended to all development as well as public realm and transportation improvements, and**
 - b. **whether additional emphasis should be placed on greening and climate resilience in buildings and in the public realm.**
15. Energy security and resilience are a topic of growing importance. As businesses become more energy hungry through increasing IT capacity and companies work in an increasingly inter-connected business environment there is greater importance in safeguarding energy supplies against localised black-outs.

16. Many City businesses currently safeguard against energy supply problems through on-site back-up generators, which are often diesel fuelled and add to air pollution. A possible solution is to promote decentralised energy generation linked with combined heat and power, such as exists at Citigen. Larger district heating/cooling networks can help mitigate energy demands, but are costly and time-consuming to implement. Smart-grid technology may also be a way to help manage energy demand and reduce the risks of unexpected surges in demand and ensuring there is available supply.
17. **The Sub-Committee is asked to comment on whether enabling infrastructure such as district heating networks and smart grid transmission and distribution equipment should be considered as essential for the City's future and built into the Local Plan.**

This page is intentionally left blank