



Local Plans Sub (Planning and Transportation) Committee

Date: WEDNESDAY, 18 JULY 2018
Time: 3.30 pm
Venue: COMMITTEE ROOMS - 2ND FLOOR, WEST WING, GUILDHALL

Members: Christopher Hayward (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Randall Anderson
Mark Bostock
Deputy Keith Bottomley
Marianne Fredericks
Alderman Gregory Jones QC
Dhruv Patel OBE

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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 meeting on 27 June 2018.

For Decision
(Pages 1 - 6)

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

Report of the Director of the Built Environment.

For Decision
(Pages 7 - 52)

5. **QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**

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

7. **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 Schedule 12A of the Local Government Act.

For Decision

8. **NON-PUBLIC MINUTES OF THE LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE**

For Decision
(Pages 53 - 56)

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

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

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Wednesday, 27 June 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)
Randall Anderson
Mark Bostock

Deputy Keith Bottomley
Marianne Fredericks

Officers:

George Fraser	- Town Clerk's Department
Paul Beckett	- Department of the Built Environment
Adrian Roche	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
John Harte	- Department of the Built Environment
Jonathan Blathwayt	- Department of the Built Environment

In Attendance:

Richard Desmond	- Northern & Shell
Tony McCurly	- Northern & Shell
Jonathan Marginson	- DP9
Lee Polisano	- PLP
Tina Qiu	- PLP

1. APOLOGIES

Apologies were received from Dhruv Patel.

2. MEMBERS' DECLARATIONS

There were no declarations.

3. MINUTES

The Sub-Committee considered the minutes from the last meeting, held on 5 June 2018.

RESOLVED – That the minutes be approved.

MATTERS ARISING

In reference to Item 8 on the agenda, a Member queried the inclusion of the item on the agenda, particularly noting that it was marked as non-public. It was commented that this would raise an issue around perception of the intentions of Northern & Shell. The Chairman noted the point made by the Member, but advised that other participants at the Pool of London Workshop in April 2018

had been given the same opportunity to present their views on the area to the Sub-Committee and had not taken up this offer. The Director of the Built Environment advised the Sub-Committee that this was simply an opportunity for individuals or groups to present their views on the future of the Pool of London area to help Members be better informed when at later meetings they consider and make decisions on planning policy. A second Member noted that similar briefings occurred on occasion without being subject to their own agenda item and noted that any policy decision-making on the subject would always be done in a public session. The Chairman asked if Members were content to note the concerns and, given the assurances that equal opportunity had been given to all interested parties, to proceed. Members were content, except one Member who reiterated their disapproval at the item's inclusion on the agenda.

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

The Sub-Committee considered a report of the Director of the Built Environment that proposed draft retailing policies for the new Local Plan.

The Director of the Built Environment provided Members with an update on the local plan.

Members discussed the draft policies outlined within report appendix 1:

Core Strategic Policy CSXX: Retailing

A Member asked how Principal Shopping Centres (PSCs) were being defined and asked if language could be included that explained this. (1)

In reference to paragraph 6, a Member asked what was meant by the phrase “detract from [...] vitality of PSCs”. The Director of the Built Environment explained that it was a judgement on whether a unit would detract from the success of other centres in its proximity. The Member noted that if this was a judgement, rather than something clearly defined, then this was an issue. The Director of the Built Environment explained that there were definitions, citing the 2,500m² size threshold for a Retail Impact Assessment.

A Member asked what was meant by “retail links” and the Director of the Built Environment explained that it referred to streets linking the PSCs and linking the PSCs with transport hubs or centres in adjoining boroughs. The Member emphasised the importance of using meaningful and clear language as far as possible.

A Member noted that there was further potential for coordination with the resident population of Islington to the North. A Member suggested that there was a danger of over-engineering retail planning strategies in specific areas, and the focus should be on ensuring optimum design with consideration to aspects such as delivery access and allowing a greater degree of natural growth.

A Member raised their concerns about the potential for policy to lead to homogenous clustering of chain coffee shops and fast food outlets. The Director of the Built Environment explained that A1 units concentrated in PSCs

included a wide range of shops offering 'comparison goods' shopping opportunities. The Member noted that the City of London was not a very large geographic area and argued that there should be some degree of flexibility to consider different A1 uses to meet resident needs.

Policy DM X.X: Principal Shopping Centres

Members discussed the issue of Office developers' reluctance to offer significant space for retail. A Member noted the issue of frontage length and noted that licenced premises with significant frontage can have a huge impact on the local vicinity. The Director of the Built Environment agreed to include policy encouragement for varied retail frontages (2). A Member queried the requirement of impact assessments from developers. The Director of the Built Environment explained that over a certain size an impact assessment was required. The Member explained that the assessment was a very important aspect to inform decision making.

Policy DM X.X Retail Links

In reference to retail links, a Member queried how these were encouraged with Islington borough. The Director of the Built Environment explained that a joint site visit was taking place in the week following the meeting, and that there had been collaboration with Islington around the Culture Mile. The Chairman of the Planning & Transportation Committee explained that he had had a discussion with his counterpart in Islington Council. Liaison with other boroughs is a statutory duty on the City as a planning authority under the duty to cooperate.

Policy DM X.X Ground floor retail provision elsewhere in the City

A Member asked whether the City Corporation's policy was to allow retail development only on the ground floor of office buildings. The Director of the Built Environment explained that retail development would be permitted on other floors if developers are able to demonstrate that there would be no adverse impact on the City's business role. The Chairman noted that there was still a lot of potential in the City with regards to retail. A Member emphasised the importance of developers being kept aware of what is permitted to ensure that potential is met.

Policy DM X.X: Specialist Retail Uses and Markets

A Member requested that this policy be separated into two individual policies, one for Specialist Retail, and one for Markets. The Sub-Committee agreed.

RESOLVED – That the policies set out within the report be agreed, taking into account Members' comments.

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

A Member explained that they had recently visited Cory who just appointed a new commercial director and were keen to increase freight on the River Thames. The Member explained that river freight had many benefits as an alternative to road freight, such as being more economical, less polluting and reducing road traffic. They suggested that it would be beneficial to consider the possibility of using Walbrook Wharf as a consolidation centre, and in general

terms a long-term vision for the increased use of river freight. The Director of the Built Environment confirmed that increased use of the river for freight was already a policy aim. The Member explained that Cory would also be willing to sponsor a conference with key stakeholders for all boroughs using the River Thames, focused on both cargo and leisure. The Chairman explained that the ideas were very promising and thanked the Member for their update.

6. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no urgent 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.	Paragraph(s) in Schedule 12A
9, 10	3

8. POOL OF LONDON PRESENTATION

The Sub-Committee heard a verbal presentation from local landowner Northern and Shell and their architects PLP that provided Members with a potential vision for redevelopment of the Pool of London area.

PLP presented a visualisation of their wider vision for the area and explained that this had previously been presented to Members, officers and others at the Pool of London workshop in April.

The Director of the Built Environment asked for clarification of the current status of the proposal. PLP explained that they were simply presenting a vision, and that no application had been submitted nor any action taken to proceed further than this.

A Member asked why the documents had been created, and PLP explained that they had been asked by Northern & Shell to provide a vision for the Pool of London alongside the redevelopment of Northern & Shell's site.

A Member asked if the Port of London Authority had been consulted on the vision, to which PLP confirmed that they had been, along with the Chairman and officers on previous occasions. The Member asked if any other stakeholders had been consulted, and PLP confirmed that they had not been.

PLP provided an update to Members on the historical development of the area that highlighted how trading on the riverside had reduced over time, and subsequently how the vibrancy of the area had dwindled. They explained that there was currently little activity in the riverside area. They explained that Lower Thames Street was even recommended in tourist literature as the main pedestrian route to the Tower of London rather than the Riverside Walk.

PLP argued that redevelopment of the Northern and Shell site as part of a more comprehensive redevelopment could help resolve servicing issues for several riverside sites along Lower Thames Street.

PLP suggested that more activities could be attracted to the riverfront through a greater mix of uses. They explained that a land use study carried out found that it was feasible to increase vibrancy at ground level without reducing employment space.

Northern & Shell explained that there was a unique opportunity to achieve change in the area, given that five of the buildings in the Pool of London Area were likely to have vacant possession in a similar timeframe. They noted that there was resistance to increased residential use within the City of London but suggested more flexibility on the riverside would be needed to make development economically viable without compromising the City's office provision. They suggested that the character of the Pool of London area was slightly different to that of the traditional City, and argued that this warranted the increased flexibility on development of ground level use by cafes and restaurants etc. to utilise a part of the riverside that is currently isolated. They emphasised that their ideas for the Pool of London represented nothing more than a vision and had not been submitted as a plan.

A Member explained that they were strongly in support of regeneration of the Pool of London and were interested to hear views on the appropriateness of the riverside sites for social housing. A Member interjected to raise concerns over the appropriateness of detailed discussions relating to specific sites, commenting that such detailed questions towards a developer's proposals were not appropriate for a non-public session of a sub-committee tasked with forming planning policy. The Member expressed concerns that the non-public session would prejudice members' ability to consider future planning applications. Northern & Shell explained that their intention was simply to present ideas to the Sub-Committee that they hoped would contribute to the policy debate. The Chairman recognised the danger of misconceptions in this regard, supported the Member's views on the importance of transparency and noted that all interested parties at the Pool of London workshop had been given equal opportunity to present ideas to the Sub-Committee and so no preferential treatment had been allowed to Northern & Shell. The Director of the Built Environment explained that this presentation aimed to inform the Sub-Committee's thinking as part of the local plan review process for the City as a whole and for the Pool of London in particular, emphasising that no detailed discussion over Northern and Shell's site proposals were appropriate.

A Member asked if this was the only option that would overcome the constraints on servicing. PLP explained that research they had conducted on Billingsgate found that large vehicles were forced to stop on the road, whilst only smaller vehicles could gain access to that part of the riverside. The inclusion of the cycle lane on Lower Thames Street was exacerbating the issue further. PLP considered there was a strong logic for basement servicing access for all the buildings in the area as part of a comprehensive approach.

The Director of the Built Environment noted that improving servicing was a clear policy objective.

Members agreed that the Pool of London area required addressing. The Chairman noted the comparison with the utilisation of the river on the South Bank and illustrated his dissatisfaction with the current state of the riverside in the area.

The Director of the Built Environment confirmed that officers would bring bullet-point policy options for the Local Plan Areas of Change (including the Pool of London area) to the Sub-Committee prior to recess. (3)

A Member requested that notes of the Pool of London workshop held in April be circulated, including details of attendees and parties that had been invited to speak to the Sub-Committee should they wish to. (4)

RESOLVED – That Northern & Shell and PLP be heard.

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

Members raised questions to the Sub-Committee whilst the public were excluded.

10. **ANY OTHER NON-PUBLIC BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There was one item of urgent business considered whilst the public were excluded.

The meeting closed at 11.56 am

Chairman

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Committee(s)	Dated:
Local Plans Sub (Planning and Transportation) Committee	18/07/2018
Subject: City of London Local Plan Review: Proposed draft policies	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Adrian Roche, Department of the Built Environment	

Summary

At previous meetings of this Sub-Committee, Members have considered emerging draft policies for the new Local Plan. Members made several comments and suggestions, which will inform the final version of the draft Plan that is presented to this Sub-Committee and to the Grand Committee. Three further sets of draft policies, relating to Offices, Tall Buildings and Protected Views and Design, are attached to this report.

Draft vision statements are attached relating to the proposed Key Areas of Change to be identified in the new Plan. Members are invited to comment on these vision papers to form the basis for drafting the policies for these areas.

In addition, a note of the discussions which took place at the Pool of London workshop in April 2018 are attached for Members' information.

Recommendations

Members are recommended to:

- Agree the proposed draft policies set out at Appendices 1-3 of this report;
- Agree the proposed vision papers for the Key Areas of Change at Appendix 4 of this report; and
- Note the contents of the note of the Pool of London workshop held in April 2018 at Appendix 5 of this report.

Main Report

Background

1. At the meetings of this Sub-Committee on 22nd September 2017 and 6th October 2017, Members agreed the broad structure of the draft Local Plan and considered policy directions for key policy areas. Officers are currently preparing draft policies, informed by the steer from Members and a range of other factors such as national policy, the London Plan, the evidence base and the outcome of the Issues and Options consultation.

2. Ten sets of policies have so far been considered at previous meetings of this Sub-Committee, namely Culture, Visitors and the Night-Time Economy; Circular Economy and Waste; Smart Infrastructure and Utilities; Climate Resilience and Flood Risk; Historic Environment; Healthy and Inclusive City; Housing; Safe and Secure City; Open Spaces and Green Infrastructure; and Retailing.
3. Members made various comments and suggestions, which will be reflected in the amended versions of those policies when the full draft Local Plan is reported to this Sub-Committee and to the Grand Committee in autumn 2018.

Draft policies

4. The following sections of the Local Plan has now been drafted and are attached as Appendices 1-3 of this report:
 - Offices;
 - Tall Buildings and Protected Views; and
 - Design
5. Members should note that the Local Plan is not being drafted in the order that policies will appear in the final version, other than the City-wide policies which are being prepared ahead of the area-specific policies.
6. Members are asked to consider the proposed policy wording and to advise of any additions, deletions or other amendments that should be made before the relevant policies are presented to the Grand Committee.
7. The Sub-Committee previously indicated that it wished to consider the detailed wording of all the policies in the draft Local Plan but not the supporting text. Members are therefore asked to focus comments on the wording in the policy boxes. However, the supporting text is also presented to help explain the reasoning behind the proposed policies, and may assist with understanding the terminology used in some of the draft policies.

Key Areas of Change vision papers

8. When the broad structure of the draft Local Plan was considered by this Sub-Committee on 22nd September 2017, Members agreed that it would be desirable to continue to prepare area-based policies for areas of the City where significant change is anticipated during the Plan period. It was also agreed to re-name the Key City Place policies in the current Local Plan as Key Areas of Change to better reflect their purpose.
9. The table below summarises which areas of the City the Sub-Committee considered should be identified as Key Areas of Change in the draft Plan.

Key City Places in current Local Plan	Key Areas of Change previously agreed by this Sub-Committee
The North of the City	Smithfield and Barbican (Culture Mile)
Cheapside and St Paul's	
Eastern Cluster	Eastern City Cluster
Aldgate	Aldgate and Tower
Thames and the Riverside	Blackfriars Pool of London

10. During the Sub-Committee meeting held in September 2017, a discussion took place about whether an area in the West of the City should be identified as a Key Area of Change. No decision was reached at that meeting, but officers were asked to give further consideration to the matter and to report back to Members. In the intervening period the City Corporation has moved forward with plans to develop a new Court Building and City Police building at Fleetbank House, which will bring significant changes to the Fleet Street area. Major occupiers will also be relocating from Fleet Street to other parts of the City, leaving large buildings which require re-use. Officers have therefore come to the view that there is now a clear justification for identifying a Key Area of Change centred on Fleet Street in the draft Local Plan.
11. Attached to this report as Appendix 4 are short papers for each of the Key Areas of Change previously agreed plus Fleet Street. The papers provide background context, outline the proposed spatial extent of each area and set out in bullet point format a draft vision for each area. Members are asked to agree the attached papers as a basis for preparing the detailed policies for the Key Areas of Change, which will then be presented to the Sub-Committee for consideration at the September meeting.

Pool of London Workshop

12. At the Sub-Committee meeting on 27th June, Members asked for a note of the discussions which took place at the public workshop on the Pool of London on 20th April. This is attached as Appendix 5 to this report and outlines the key presentations and comments from individual discussion tables, together with a list of attendees.

Next steps

13. Officers are in the process of drafting the final sections of the draft Local Plan, which will be presented to the Sub-Committee in September. It is intended to bring the full Plan back to the Sub-Committee for approval before it is reported to the Grand Committee in the autumn so that it can be published for public consultation alongside the draft Transport Strategy in November 2018.

Corporate and Strategic Implications

14. The review of the Local Plan is being informed by the emerging draft Corporate Plan and will provide an opportunity to complement key corporate

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

Appendices

- Appendix 1 – draft policies on Offices
- Appendix 2 – draft policies on Tall Buildings and Protected Views
- Appendix 3 – draft policies on Design
- Appendix 4 – vision papers for the Key Areas of Change
- Appendix 5 – note of the public workshop on the Pool of London on 20th April

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Appendix 1 – draft policies on Offices

Context

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.

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 XX).

The City was home to 17,980 businesses¹ and 483,000 workers² 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 employees³.

The intense concentration of business occupiers in a small physical area is a key part of the attraction for companies looking to move into the City as it offers them economies of scale and scope. The agglomeration, or clustering, effect is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business.

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 office employment in the City of London will grow by over 60,000 from 2016 to 2036⁴. London's rapidly growing population will also create the demand for more employment and for the space required to accommodate it.

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 London's continued growth as a global financial and business centre.

¹ ONS Business Activity 2016

² Business Register and Employment Survey, 2017

⁴ London Office Policy Review 2017

Core Strategic Policy CS XX: Offices

To ensure the City of London provides additional 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 gross during the period 2016 to 2036, to meet the long term economic needs of the City and accommodate projected employment growth.
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

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.

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.

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" companies⁵, 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.

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 SMEs⁶. 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.

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

⁵ London Office Snapshot, Colliers Jan 2017

⁶ Supporting Places of Work: Incubators, Accelerators and Co-working Spaces.

major overhead for new businesses and rents in the City can be prohibitive to new occupiers⁷.

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 DM XX: Office Development

1. Office development should:
 - Be of a high quality of 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

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. In order for the City to remain resilient to change, 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.

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.

Proposals for new office development should demonstrate design quality and flexibility and include a suitable mix of complementary commercial or other uses

⁷ Clusters and Connectivity: The City as a Place for SMEs, City of London, March 2016

appropriate to the site and location. This will improve the attractiveness, adaptability and resilience of City office stock.

Policy DM XX: 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

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.

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.

Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy XX 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

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.

The loss of office floorspace at ground and lower ground levels may improve the vibrancy of an area by introducing more active frontages and so will not normally be

resisted. 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.

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. Proposals must also be supported by evidence that the continued office use of the site would be unviable in the longer term. The loss of office floorspace at ground and lower ground levels to provide small-scale complementary commercial or supporting uses will not need to be supported by this additional information.

Marketing of the building should be undertaken for a minimum period of 18 months. The City Corporation needs to be satisfied that the site/building has been offered at a 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.

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.

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 DM XX: Temporary Alternative ‘Meanwhile’ Use of Offices

1. Temporary use from 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

Where office buildings or sites are vacant, and development is not expected in the short term, 'meanwhile' 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

'Meanwhile' uses will be granted for a maximum of 36 months, after which the use will revert to office use. Applications to extend the period of the 'meanwhile' use or make it permanent will be considered at the time in the policy context of the Local Plan objective to protect existing office use.

Appendix 2 – draft policies on Tall Buildings and Protected Views

Core Strategic Policy CS XX: 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:
 - a. the potential effect on the City skyline, the wider London skyline and historic skyline features;
 - b. the character and amenity of their surroundings, including the relationship with existing tall buildings;
 - c. the significance of heritage assets and their settings;
 - d. the provision of a high quality public realm at street level; and
 - e. 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 should provide for permeability at street level and incorporate areas or facilities at upper levels which are accessible to the public and 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 of 309.6m AOD.
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

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.

Tall buildings are defined as those exceeding 75m AOD in height. Figure XX 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 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.

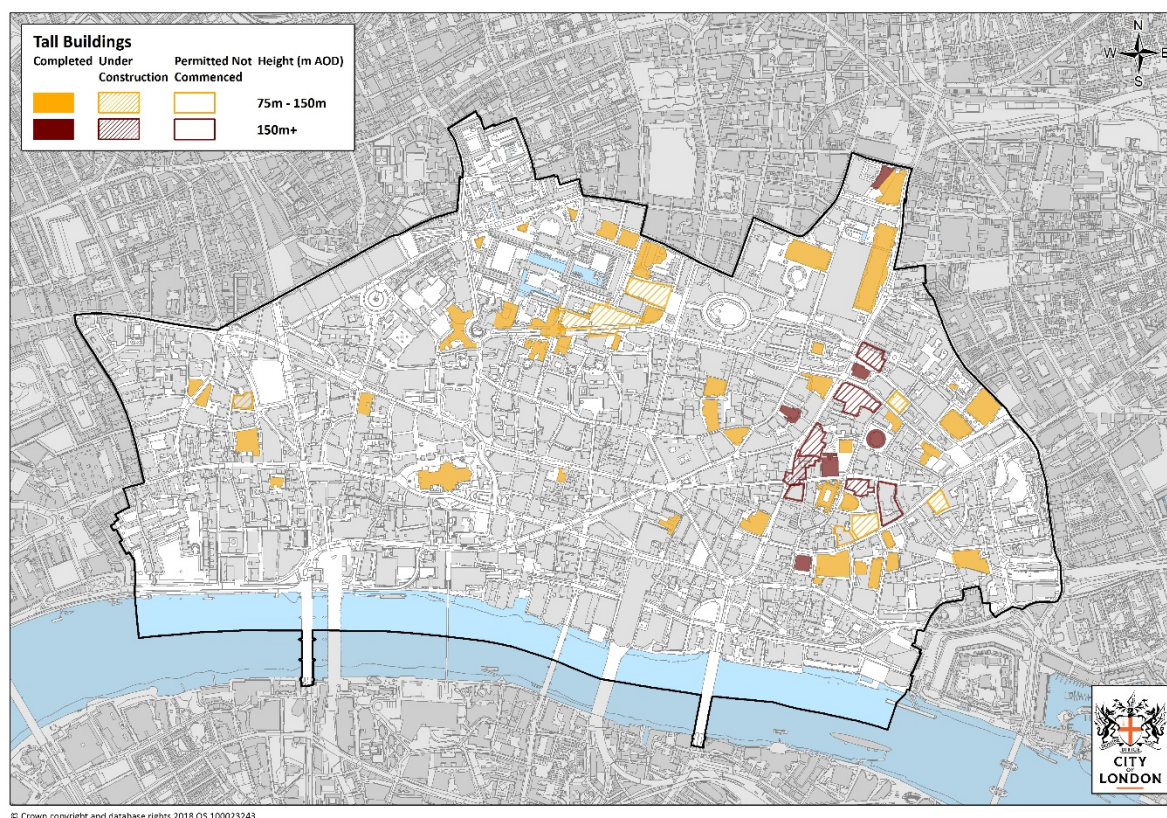


Figure XX: Tall buildings distribution in the City of London March 2017

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.

The Eastern 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 XX (Eastern City Cluster) provides more details about the considerations that apply to new tall building proposals in that area.

Outside of the Eastern City Cluster, there is limited scope for new tall buildings due principally to conservation area and views protection considerations. Figure XX

identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies.

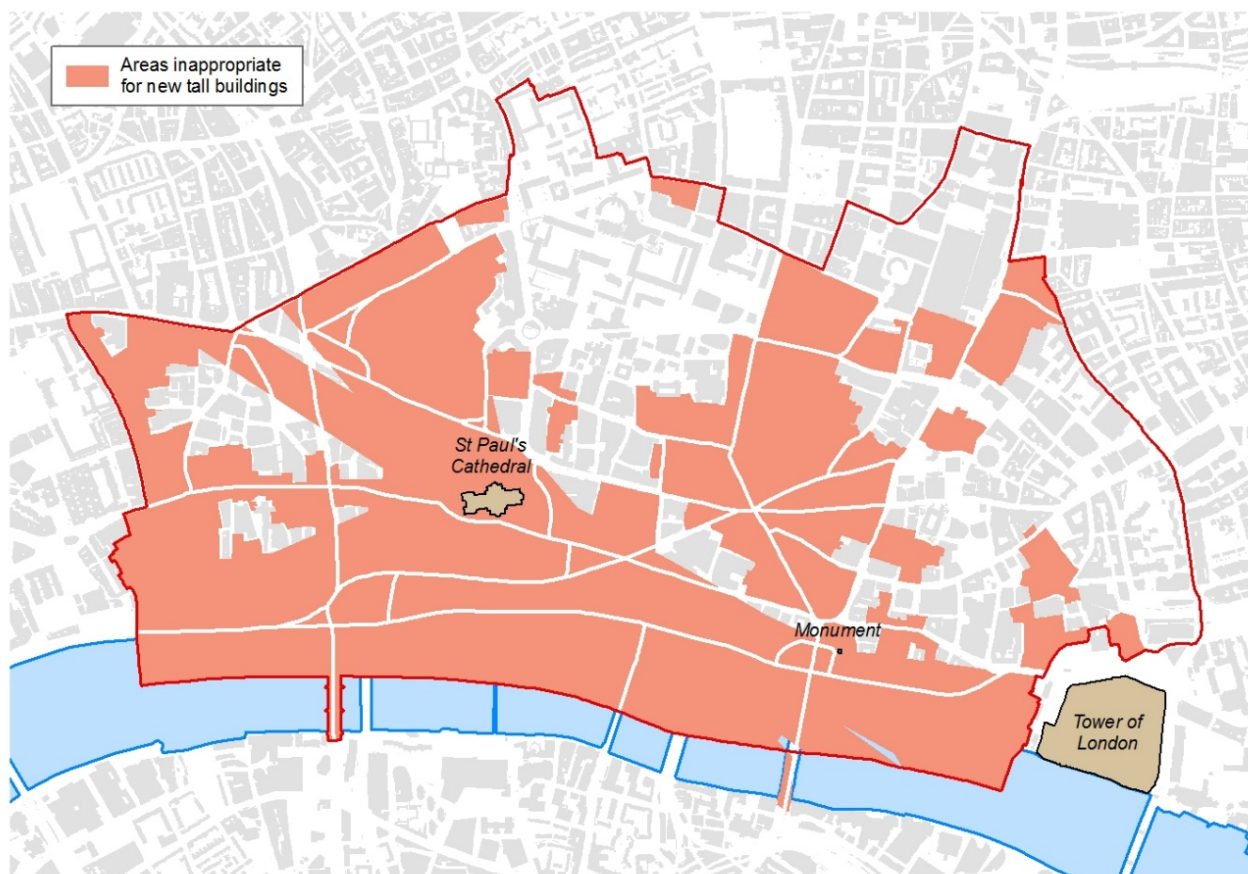


Figure XX: Areas inappropriate for new tall buildings

How the policy works

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.

Tall building proposals must comply with 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.

The development of tall buildings must take account of the policies elsewhere in this plan and City Corporation guidelines in 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.

Proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. The City Corporation will also 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.

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, including features such as public viewing galleries or educational facilities.

Core Strategic Policy CS XX: 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

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.

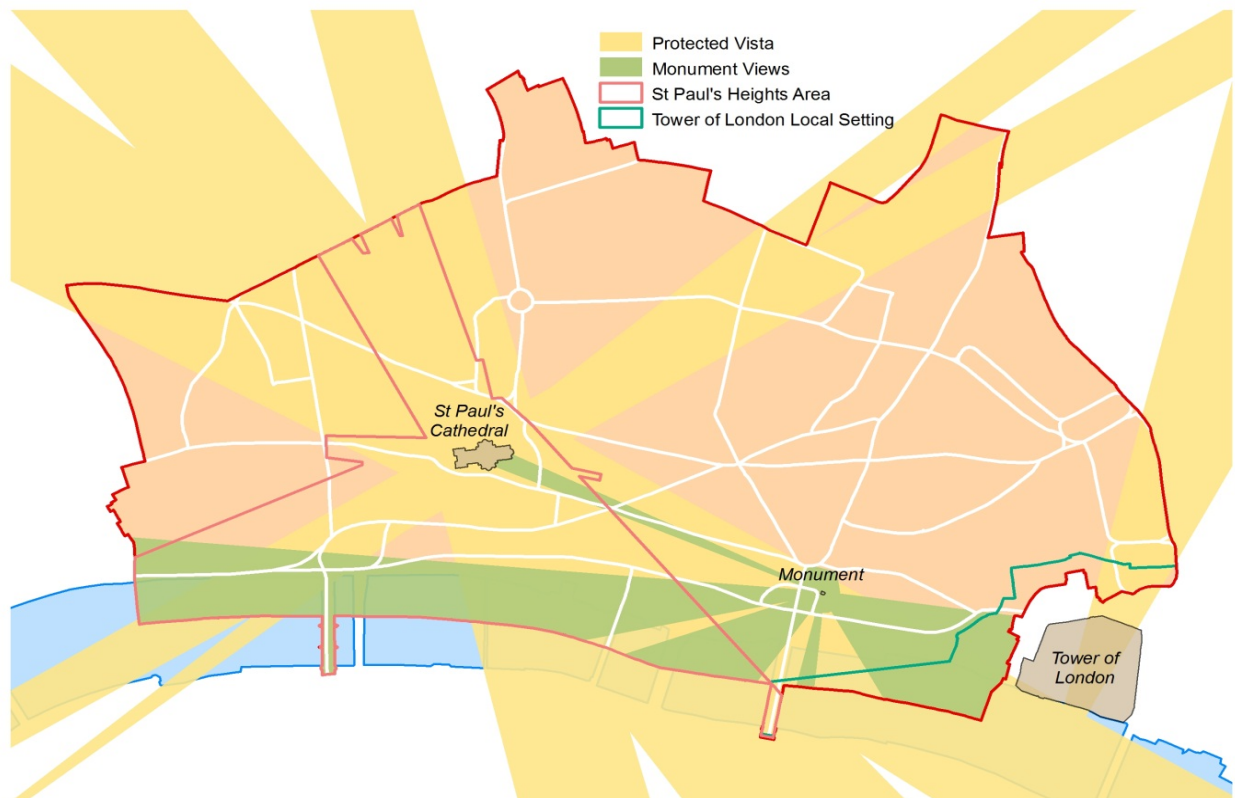


Figure XX: Areas covered by protected views

How the policy works

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.

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.

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.

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.

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 a forthcoming update to the Protected Views SPD.

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.

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.

Appendix 3 – draft policies on Design

Context

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.

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.

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.

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.

Core Strategic Policy XX: Design

The City Corporation will promote innovative and high-quality urban design and sustainable buildings, streets and spaces and contribute towards a zero emission City by:

1. Requiring all development to demonstrate the highest feasible and viable environmental standards;
2. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces;
3. Seeking design solutions that make effective use of limited land resources;
4. Maximising active frontages at street level and providing for public and private amenity space at upper levels;
5. Requiring the design of buildings, streets and spaces to meet the access needs of all the City's users;
6. Ensuring new development is permeable and respects, maintains and restores the City's characteristic network of streets and alleyways;
7. Delivering improvement in the environment, micro climate, amenities and enjoyment of open spaces, play areas, streets, lanes and alleys through public realm enhancement schemes;

8. Requiring signs and advertisements to respect the restrained character of the City;
9. Ensuring that lighting is in keeping with the character of surrounding buildings and streetscape; and
10. Ensuring that the building design concept is maintained from permission to completion of a project.

Reason for the policy

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. To create a zero-emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.

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.

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.

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.

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.

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 DM X.1: Sustainability Standards

All development must demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development.

Proposals for major development¹ will be required to

- achieve a BREEAM rating of “excellent” or “outstanding” against the current, relevant BREEAM criteria, 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

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

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.

¹ Major development is defined as >1000sq m or >10 residential units. Substantial refurbishments with a total gross floorspace of >1000 sq m will be classified as Major development.

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

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.

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.

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.

Policy DM X.2: New Development

New development, including alterations and extensions to existing buildings, should be of a high standard of design and architectural detail and avoid harming the townscape and public realm.

The design of all new development must ensure that:

1. 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.
2. Appropriate, high quality and durable materials are used.
3. The design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm.
4. 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.
5. 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.
6. 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.
7. There is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening.
8. Buildings are inclusive and accessible to all.

Reason for the policy

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.

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.

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 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.

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 roads. Servicing entrances should be carefully designed to minimise adverse effects on the townscape.

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.

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.

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.

Ventilation or extraction systems should be routed internally and extensive or unsightly external ducting will be resisted. 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.

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 DM X.3: 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. Public realm schemes should 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.
- 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 installation of art works and interactive art spaces where possible
- The wellbeing of users in relation to air pollution, noise, temperatures, shading and micro climate

Reason for the policy

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.

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

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.

All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City.

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.

Further information on design and requirements for the public realm is available in the City Public Realm Supplementary Planning Document.

Policy DM X.4: Permeability

1. Development should contribute towards the improvement of pedestrian permeability in the City:
 - Providing good quality, safe and low pollution pedestrian connections between spaces.
 - Respecting, maintaining and where feasible restoring, the City's characteristic network of streets 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. The City Corporation will seek improved way-finding through public realm improvements.
3. Developments should not worsen pedestrian permeability nor lead to the loss of routes and spaces that enhance the City's function, character and historic interest.

Reason for the policy

The intensification of the use of office buildings and the increase in the City's working population are putting added pressure on the capacity, convenience, comfort and safety of the 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.

Travelling by foot is the most popular and sustainable way of moving around the City. 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.

Major development will be expected deliver net gains in the public realm, through the establishment of new pedestrian routes around and through the buildings. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected, and permeability of the City compromised. Suitable security strategies will need to be in place within those buildings to incorporate this.

Improved accessibility for pedestrians will help to create a fully inclusive approach for the City.

Policy DM X.5: Terraces and Viewing Galleries

Roof terraces will be permitted providing:

1. 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; and
2. There would be no immediate overlooking of residential premises or significantly adverse impacts on residential amenity; and
3. Historic or locally distinctive roof forms, features or structures are retained and enhanced; and
4. There would be no adverse impact on protected views; and
5. The design and layout of the terrace maximises the potential for urban greening.
6. Emissions from combustion plant will not affect users of the roof garden.

The provision of free to enter, publicly accessible areas will be required as part of all tall building developments, with public viewing galleries where appropriate.

Reason for the policy

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.

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.

Roof terraces and gardens should be publicly accessible where possible and entrances should not result in safety or security concerns 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. 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.

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.

Policy DM X.6: 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.

Reason for the policy

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.

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.

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. The design of new shopfronts should include a signage zone that is consistent across a parade of shops of matching or similar design.

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.

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.

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.

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 DM X.7: 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

In order to protect and enhance the dignified 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.

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.

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. Digital advertising is not appropriate in the City's historical context. 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.

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.

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.

Appropriate action will be taken to have unauthorised advertisements removed.

Policy DM X.8: Daylight and sunlight

1. 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, will be resisted.
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

The City is an urban centre with a very high density of buildings and in some areas groupings of tall buildings. The impact of this height 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 from developers that maximise the natural light potential.

The amount of daylight and sunlight received has an important effect on the general 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

The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out several methods of assessing changes in daylight and sunlight arising from new developments. 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.

When considering proposed changes to existing lighting levels, the City Corporation will take note 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.

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 DM X.9: Lighting

- Lighting should be sensitively co-ordinated with the overall design of any new development. Applicants for a major scheme must consider the lighting strategy early in the design process.
- 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.
- External lighting of heritage assets within the City must be sympathetic to the wider context in terms of tone and brightness.
- The external lighting of buildings should contribute positively to the unique character and grandeur of the City townscape by night.

Reason for the policy

The City Corporation is developing a Lighting Strategy which can contribute 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 light 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.

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. When done sensitively, 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.

The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate only where it adds to the overall experience of the area, celebrating the unique atmosphere of the area, and providing orientation and way-finding after dark.

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.

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.

Detailed information on requirements for lighting can be found in the City Lighting Strategy.

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Appendix 4

Aldgate and Tower Key Area of Change

Context

This area contains a mix of uses, including offices, Sir John Cass Primary School, Mansell and Middlesex Street housing estates, part of Petticoat Lane market, hotels and tourist activity associate with the Tower of London. There have been considerable improvements to the area in recent years, with the Aldgate Gyratory being removed and replaced with a large public square created stimulating further change.

Major hotel and office development is under construction on Minories, an application has been submitted for redevelopment of the Mansell Street Estate and several large office sites currently have development potential. These proposals and opportunities will impact the use and environment of the area.

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.

Spatial Extent

This area is positioned in the east of the City between the City's eastern cluster of tall buildings and Tower Hamlets. The southern edge of the area is adjacent to the Tower of London and on the northern edge is the Middlesex Street estate.

Vision

- The area will be promoted and protected as a mixed use area which balances the competing needs and requirements of residents, students, workers and visitors. Diplomatic use and associated commercial activity will be encouraged.
- The needs of residents, particularly those on Middlesex Street and Mansell Street Estates will be addressed, maximising employment, health, education, recreation, retail facilities and opportunities.
- Provision will be made to meet the needs of visitors to the area, particularly around Aldgate Square and the Tower of London, , and appropriate hotel provision provided. Cultural events, open space improvements and appropriate signage and wayfinding will be progressed.
- Transport connections and pedestrian links will be improved by encouraging permeability, improving Aldgate Bus Station, and improving signage to and from Liverpool Street and Cheapside. Links to an enhanced riverside walkway in the Pool of London will be improved.
- There will be enhancement of the public realm, particularly near the school and housing estates to reduce the effects of pollution.

Blackfriars Key Area of Change

Context

The area contains a mix of uses, including offices, the City of London School, the Mermaid Conference Centre, a public Car Park, Blackfriars Millennium Pier (river transport) and London Blackfriars Station. Most development is post-war, with large footprint buildings, little or no active frontages and a lack of open space. This area is bounded by major through routes which generate pollution and form 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. Development of the Thames Tideway Tunnel will create a new public space to the west of Blackfriars Bridge. The height of any new buildings is limited by strategic and locally protected views.

Spatial Extent

The area is bounded to the north by Queen Victoria Street, the south by the River Thames, the west at Victoria Embankment next to Blackfriars Bridge and to the east by the City of London School close to the Millennium Bridge. Blackfriars Bridge forms an important connection between the City and Southwark and Blackfriars Station is a major tube and mainline train station.

Vision

- The area has the potential for substantial redevelopment or refurbishment of existing post-war buildings to provide new high-quality office and commercial accommodation within an improved public realm and enhanced pedestrian permeability.
- The new public open space at Blackfriars Bridge foreshore to be created through the Thames Tideway project, will introduce additional greenery to the riverside and provide a new place for relaxation and recreation.
- The riverside walkway will be improved to link with the new open space and provide an attractive pedestrian route between Blackfriars Bridge and Millennium Bridge. New active frontages will be provided along the walkway.
- Public realm improvements will be promoted along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. Pedestrian links across Upper Thames Street will be improved to link the riverside to the rest of the City.
- Cultural events, arts and play in public spaces will be encouraged

City Cluster Key Area of Change

Context

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 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. 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 (22 Bishopsgate, 100 Bishopsgate, the Scalpel and 6-8 Bishopsgate). Further tall buildings have been permitted but not yet commenced (1 Undershaft, 1 Leadenhall and 100 Leadenhall). 20 Fenchurch Street lies just outside of the currently identified cluster. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.

Projected employment growth will lead to a significant increase in footfall on streets that are already crowded at peak times. Servicing this concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation.

The Cluster is not only a significant employment and tall buildings location, it contains a number of other land uses: open spaces, retailing (including at Leadenhall Market) and historic churches. It forms a focus of the annual Sculpture in the City exhibition.

Spatial Extent

The City Cluster is centred on Leadenhall Street and broadly encompasses Gracechurch Street and Bishopsgate to the west, Fenchurch Street to the south (extending to include 20 Fenchurch Street), Houndsditch to the north and Aldgate to the east. It is an area within which tall buildings are considered appropriate when they don't have a significant effect on strategic and locally protected views and the setting of important heritage assets. The area is informed by technical work undertaken to develop the City's 3D modelling. It

Vision

- The area will continue to provide high quality office and commercial development, with significant growth in employment and floorspace.
- New tall buildings of world class architecture will be permitted in appropriate locations.
- New buildings will provide flexible/social co-working spaces, incorporating a range of complementary uses.
- New approaches to freight and servicing will be adopted, including the use of physical and virtual consolidation, which complements and enables further growth.

- Development will contribute towards significant improvements in the public realm, with more attractive, comfortable streets that are pleasant and safe for pedestrians. Delivery will be through the area enhancement strategy.
- Development will contribute to the delivery of area-wide security measures to ensure that the Cluster remains safe and secure.
- Timed closures of streets to vehicles will enable better pedestrian movement within and to and from the area.
- Street level uses of buildings will be encouraged to enhance vibrancy and viability, extending beyond the traditional working week to embrace weekends to diversify the City, its economy and community.

Fleet Street Key Area of Change

Context

The Fleet Street Area is the former home of the British press but has changed in character since the newspapers moved out. The western extent of the street adjoins the legal quarter at the Temples and the Royal Courts of Justice. Fleet Street is a Principal Shopping Centre 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 which are key considerations in future change. Fleet Street is the processional route through the City and a gateway into the City from the West End. It provides iconic views of St Paul's Cathedral, with clear sky behind the Cathedral Dome. Fleet Street is heavily trafficked, with narrow footways and a poor-quality environment.

The area will experience significant change in the short to medium term as some existing major occupiers relocate to other parts of the City, leaving large buildings which require re-use. Proposals for a new court building and police facilities at Fleetbank House will also bring change.

Spatial Extent

The area stretches from Ludgate Circus in the east along Fleet Street up to the boundary with Westminster in the west. It includes buildings to the north of Fleet Street as far north as New Street Square. To the south it includes Fleetbank House and down to Tudor Street; it does not include the Temples, which is not expected to experience significant change.

Vision

- The predominant land use will remain as offices, with a greater variety and flexibility of space on offer. Large buildings becoming vacant will be re-purposed to provide office accommodation and complementary uses, including leisure.
- Fleet Street's role as a centre for the legal profession will be enhanced by provision the new court building and HQ for the City of London Police. These new buildings will act as a catalyst for further public realm and environmental enhancements.
- The Principal Shopping Centre will be improved, with a high-quality retail offer centred on A1 uses and extension of the retail offer into the evening and weekends.
- Further modest residential development which complements the existing residential cluster will be permitted, provided it does not adversely affect commercial activity, including the retail use of Fleet Street.
- The character of the courts and alleyways that lead off Fleet Street will be preserved and enhanced, referencing the area's historic role as the centre of the newspaper industry.
- Public realm and transportation improvements will be delivered along the length of Fleet Street, creating a more attractive and welcoming environment for residents, workers and visitors.

Pool of London Key Area of Change

Context

The area contains predominately office and commercial uses. Although there is residential use and small-scale retail in the south-east corner close to the Tower of London, there are no identified residential on this part of the riverside. Current Local Plan policy includes a presumption against further residential development. There are no tube/train stations within the area but is well served by public transport just outside the area, including London Bridge Station, Tower Gateway (DLR) and Monument Tube. River passenger services operate from Tower Pier. To the north, Lower Thames Street acts as a significant barrier to movement to and from the rest of the City and air quality is poor. The opening of the London Bridge staircase has encouraged more pedestrians to come down onto the riverside, but the public realm is tired and uninspiring and does not reflect the importance of this area as a window or gateway to the City.

There is a mix of listed buildings (St Magnus the Martyr Church, All Hallows by the Tower Church and Custom House are Grade I listed; Adelaide House and Old Billingsgate Market are Grade II listed), older office buildings on the riverside, with more modern office and residential buildings. There is a Scheduled Ancient Monument under Billingsgate Market and the eastern part of this area adjoins the Tower of London World Heritage Site and falls within the setting of the Tower. There is limited retail or ground floor vibrancy. A number of buildings are likely to see vacant possession in the next 2-3 years providing an opportunity to deliver substantial improvements to this area.

Development proposals need to take into account the strategic views of St Paul's and the Tower of London and protected local views from the Monument.

Spatial Extent

The Pool of London is bounded to the north along Lower Thames Street and Byward Street, the south along the River Thames, the west at London Bridge and to the east at Petty Wales close to the Tower of London. The eastern part of this area lies within the setting of the Tower of London.

Vision

- Establish the area as an iconic riverside gateway to the City of London.
- Non-listed buildings on the riverside will be redeveloped and listed buildings refurbished to provide new high-quality office and commercial accommodation within an improved public realm.
- The emphasis on office-led commercial development will continue, but Members may wish to consider the potential for limited residential use.
- Servicing of buildings will be improved, including through the development of shared servicing bays and access points and collaborative management.
- Public realm enhancement will provide for greater pedestrian permeability and additional greenery to provide a place for relaxation and recreation. Vehicle

access to the riverside walk will be restricted and existing private car parking areas opened up and integrated into the public realm.

- Air quality along Lower Thames Street will be improved through joint working with TfL, with new greenery introduced to make it a more attractive environment for pedestrians, cyclists and motor vehicles.
- Crossing points over Lower Thames Street will be created and links between the riverside walk and streets, lanes and alleyways north of Lower Thames Street improved.
- Existing pedestrian routes from Lower Thames Street to the river will be enhanced and new routes created between and through buildings fronting the river.
- There will be greater use of ground floors for retail, leisure and cultural areas. New public roof terraces and spaces will be provided as buildings are redeveloped and refurbished, creating a vibrant and attractive environment.
- River flood defences will be improved, and river walls raised to meet Environment Agency requirements.

Smithfield and Barbican Key Area of Change

Context

This is a vibrant mixed-use area that contains the highest concentration of residents in the City, primarily in the Barbican and Golden Lane Estates, a growing cultural presence focused on the Barbican, the regionally important St. Bartholomew's Hospital and Smithfield Market. The development of Culture Mile, relocation of the Museum of London to Smithfield and development of a Centre of Music, combined with the opening of Farringdon Crossrail Station will mean the area will undergo significant change. Part of the area has been designated as a Low Emissions Neighbourhood and work is underway to deliver air quality improvements, focussed on improvements to Beech Street.

Spatial Extent

The Smithfield and Barbican area is positioned in the north of the City and shares a boundary with Islington. The area is bounded by Smithfield Market to west, the Golden Lane Estate to the north, Moorgate Station to the east and London Wall and St. Bartholomew's Hospital on the southern edge. The area includes Culture Mile; the proposed Culture Mile Spine will run through Smithfield and the Barbican and over to the east of the area. Secondary walking routes running north-south will be enhanced.

Vision

- The area will grow into a cultural destination of international importance, improving the public realm through the development of art/cultural events and pleasant green areas to relax in while also improving the environment for residents.
- The Museum of London will be relocated to Smithfield and a new Centre for Music is proposed for on the existing museum site.
- Improvements to the Beech Street Tunnel and the Culture Spine will reduce traffic, improve air quality, increase retail activity and improve green infrastructure and the public realm.
- Routes, wayfinding, lighting and signage will be improved throughout the area and with the rest of the City.
- Small start-up businesses and creative enterprises will be encouraged, particularly around Culture Mile.
- The cultural and commercial heritage of Smithfield and the Barbican and Golden Lane Estates will be protected and the amenity and quality of life for residents respected.
- Creative and cultural links with neighbouring areas will be promoted.

Appendix 5
City of London Local Plan Review
Pool of London Workshop, 20 April 2018

Introduction

As part of the Local Plan Review process a Pool of London public workshop was held on Friday 20th April 2018. A list of attendees is included in Appendix 1.

Presentations

At the workshop City planners set out the aims and context for the workshop on the Pool of London:

- **City of London: The City's Local Plan and the Pool of London**
The City of London Development Plans Team explained the Local Plan Review and planning policy context up to 2036. Key issues for the Pool of London were discussed, including identifying the Pool of London as a Key Area of Change.

Several key stakeholders presented their broad ideas:

- **Port of London Authority (PLA)**
The PLA explained the Thames Vision, their six key goals which included reducing road freight, the protection and promotion of safeguarded wharves, biodiversity, sport and recreation and how the numbers of passenger trips on the river is set to double to 20 million by 2035.
- **Historic Royal Palaces (HRP)**
HRP set out their vision for the area, addressing the need to improve access routes to and from the Tower of London some of which are currently clear or attractive. They expressed a desire to link the World Heritage Site with the Riverside Walk and wider City to aid visitors who often struggle to locate the entrance to the Tower.
- **Northern & Shell**
A proposed vision was presented for the Pool of London, outlining its historical development, existing context and future opportunities, including promoting active frontages for the riverside buildings.
- **City Rivergate**
The presentation set out the challenges, conflicts and opportunities including proposals for a 'high-line' walkway on Lower Thames Street and a boardwalk along the riverfront.

Round Table Discussions

Following the presentations, round table discussions took place looking at use of the river, land use, public realm and connectivity. Key points raised were:

Use of the river

- The PLA had carried out a risk assessment, which revealed the Pool of London area (along with King's Reach) to be the most congested sections of the Thames in central London. Approximately 30 cruise ships a year sail up to central London and provision could be made for smaller cruise ships to berth in the Pool of London.
- Additional pier capacity is needed as Tower Pier is heavily used and operating at or over capacity.
- The area by Tower Pier is used by cruise ships for embarking and disembarking which results in congestion around the entrance to the Tower of London which adversely affects pedestrian flows in the vicinity. However, to enlarge Tower Pier would be difficult so other sites should be considered by the creation of another pier. Funding from TfL for improvements to Tower Pier would be limited and would need to be sought elsewhere, e.g., through developer contributions.
- A significant constraint is that the river is shallower along the Northbank than it is near HMS Belfast on the Southbank. Mitigation in the form of dredging would be required to accommodate larger cruise ships.
- There is potential to provide a permanent mooring for HMS President near London Bridge. HMS President is one of three surviving Royal Navy Warships from the First World War and a significant heritage asset. The vessel has been temporarily relocated to Chatham Dockyard and the owners are searching for a new mooring in central London due to the Thames Tideway Tunnel works at Blackfriars Bridge foreshore adjacent to its former mooring.
- The Thames foreshore is widely used and has significant archaeological interest south of Lower Thames Street, which needs to be considered in conjunction with any plans for additional use of the river. There is a history of sequence of waterfronts built out into the river from Roman period on.
- This area of the City is within a Flood Risk Zone. There is a need to raise the river wall (by 0.5m by 2065 and 1m by 2100) to prevent high-tide floods.
- Any changes should consider the importance of biodiversity of the Thames and scope to improve habitats.

Land uses along the riverfront

- The need for significant investment to refurbish/redevelop office buildings on the riverside presents an opportunity to reconsider their form, layout and land uses and avoid blank facades. Proposals should take account of protected views.
- There was a difference of opinion within the groups on potential uses; some people considered that properties along the riverfront are only suitable for commercial and leisure uses and that residential should not be part of the mix; however, others felt there is scope for some residential.
- There was broad support and aspiration for the provision of active frontages at ground floor level, including retail and leisure uses, bars and restaurants, culture and heritage and that the Northbank becomes a destination in its own right.

Cultural uses had played a key role in the regeneration of the Southbank and the groups were in favour of cultural uses and facilities in the Pool of London to attract more visitors.

- There is limited footfall along this stretch of the riverside and in order to attract retail/cultural uses additional infrastructure would be needed through development proposals. There was a recognition that there was future scope to bring more visitors by river to Tower of London/Tower Bridge/Monument.
- The area includes some outstanding heritage assets, which are not currently being used in ways which fully reflect their significance therefore an opportunity to explore new uses. Both the Custom House (soon to be vacated) and Old Billingsgate Market were recognised as key landmarks and potential attractions, so any potential uses would need to reflect their historic status.

Public realm, movement and connectivity

- The riverside needs to be connected back to the rest of the City. It was noted that the riverside buildings are south facing and that more advantage could be taken of this, for instance by promoting outdoor terraces and cafes with seating. However, one of the challenges is that many of the buildings along the riverfront are of large bulk and massing, which restricts permeability and that land ownership is fragmented.
- Radical solutions are needed to deal with Lower Thames Street. TfL recognises that something needs to be done to tackle congestion, safety and poor air quality. There is scope to improve access to buildings/more roadway servicing and improvements along the Cycle superhighway along Lower Thames Street.
- There is scope to improve north/south pedestrian flows across Lower Thames Street linking to streets to the north such as Fish Street Hill. There is a need to improve visibility to the river. The potential to introduce upper level walkways was suggested, noting their use in the London Wall Place development.
- There was support for the provision of new public spaces and more greenery to make an attractive and welcoming public realm rather than hard landscaping which is currently prevalent in this area. Concerns were raised about potential cost and the need for developer contributions. Facilities for pedestrians and cyclists were also supported, together with improved wayfinding.
- The difficulties of connectivity were recognised including both pedestrians and the servicing of riverside sites. A collaborative approach to vehicle deliveries and servicing was seen as a desirable objective.
- Better pedestrian routes are required to other parts of the City, especially Eastcheap, Monument, Billingsgate Bath House, Leadenhall Market, Eastern City Cluster and links to Guildhall, St Paul's and Culture Mile to draw people into the Square Mile.
- There is a need to recognise the nearby attractions of the Tower of London, Tower Bridge and St Katherine's Dock and improve links between them and the City to encourage visitors from these areas.
- Visitors expect to be able to walk along the riverside, but there are access issues in places. For example, removal of car park and railings at front of Custom House would open up this part of the Riverwalk and could be landscaped.

Removal of the car park at Adelaide House near the London Bridge steps would open up this western end of the Pool of London.

- The link between Monument and St Magnus House has huge potential although it is not obvious how to get to the river due to the severance of Lower Thames Street.
- The riverside walk should be pursued as it is a key area in this historic part of London. The potential for a consistent Riverwalk with the opportunity for further viewing platforms was mentioned.
- Infrastructure improvements were felt to be key to the successful regeneration of the Pool of London. It was noted that 4G and Wi-Fi was very limited in this area, but that the arrival of 5G in 2020 would likely solve this. The proposed boardwalk project would need to be delivered upfront to help create a sense of 'destination'. However, funding a project such as the boardwalk would be challenging as well as delivery given the fragmented ownerships. Proposals to deliver a decked pedestrian route over Lower Thames Street would not be straightforward in this area.

Next Steps

The Chairman of the City Corporation's Planning & Transportation Committee thanked attendees for their input. Comments made would be used to help officers and the Committee develop new planning policy for the Pool of London as part of the Local Plan Review.

An invitation was extended to attendees to present further ideas and policy proposals to the Local Plans Reference Sub-Committee to assist in their consideration of new planning policies for the Pool of London.

Appendix 1

A list of attendees shown below:

Stakeholders:

<u>Name:</u>	<u>Company:</u>
Michael Atkins	Port of London Authority
Stuart Baillie	GL Hearn (City Rivergate)
Tim Beckett	Historic Royal Palaces
Tim Brennan	Historic England
Anthony Brogan	Montagu Evans
Tom Campbell	Environment Agency
Guy Brocklebank	Thames Traditional Rowing Association
Katharine Fletcher	Historic England
Gareth Fox	Montagu Evans
Andy Goodchild	Wolff Architects (City Rivergate)
Heather Hilburn	Historic Royal Palaces
Bob Hill	Historic Royal Palaces
Jonathan Marginson	DP9 (Northern & Shell)
Aleksandra Milentijevic	London Borough of Tower Hamlets
Ganesh Nadarajah	City Rivergate
Lee Polisano	PLP Architects (Northern & Shell)
Adam Pyrke	Cushman & Wakefield
Tina Qiu	PLP Architects (Northern & Shell)
Stuart Turner	Trinity House
Zoe Turner	Trinity House
Simon Wainwright	JPW Real Estate (City Rivergate)

City of London Members:

<u>Name:</u>	<u>Company:</u>
Christopher Hayward (Chairman)	City of London
Randall Anderson	City of London
Mark Bostock	City of London
Deputy Keith Bottomley	City of London
Marianne Fredericks	City of London
Susan Pearson	City of London

City of London Officers:

<u>Name:</u>	<u>Company:</u>
Paul Beckett	City of London
David Bianco	City of London
Melanie Charalambous	City of London
Therese Finn	City of London
Annie Hampson	City of London
John Harte	City of London
David Horkan	City of London
Simon McGinn	City of London
Tom Parker	City of London
Adrian Roche	City of London
Peter Shadbolt	City of London
Kathryn Stubbs	City of London

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

WEDNESDAY, 27 JUNE 2018

NOT FOR PUBLICATION

By virtue of paragraph 3 of Part I of Schedule 12A of the Local Government Act 1972.

8. POOL OF LONDON PRESENTATION

The Sub-Committee heard a verbal presentation from local landowner Northern and Shell and their architects PLP that provided Members with a potential vision for redevelopment of the Pool of London area.

PLP presented a visualisation of their wider vision for the area and explained that this had previously been presented to Members, officers and others at the Pool of London workshop in April.

The Director of the Built Environment asked for clarification of the current status of the proposal. PLP explained that they were simply presenting a vision, and that no application had been submitted nor any action taken to proceed further than this.

A Member asked why the documents had been created, and PLP explained that they had been asked by Northern & Shell to provide a vision for the Pool of London alongside the redevelopment of Northern & Shell's site.

A Member asked if the Port of London Authority had been consulted on the vision, to which PLP confirmed that they had been, along with the Chairman and officers on previous occasions. The Member asked if any other stakeholders had been consulted, and PLP confirmed that they had not been.

PLP provided an update to Members on the historical development of the area that highlighted how trading on the riverside had reduced over time, and subsequently how the vibrancy of the area had dwindled. They explained that there was currently little activity in the riverside area. They explained that Lower Thames Street was even recommended in tourist literature as the main pedestrian route to the Tower of London rather than the Riverside Walk.

PLP argued that redevelopment of the Northern and Shell site as part of a more comprehensive redevelopment could help resolve servicing issues for several riverside sites along Lower Thames Street.

PLP suggested that more activities could be attracted to the riverfront through a greater mix of uses. They explained that a land use study carried out found that it was feasible to increase vibrancy at ground level without reducing employment space.

Northern & Shell explained that there was a unique opportunity to achieve change in the area, given that five of the buildings in the Pool of London Area were likely to have vacant possession in a similar timeframe. They noted that there was resistance to increased residential use within the City of London but suggested more flexibility on the riverside would be needed to make development economically viable without compromising the City's office provision. They suggested that the character of the Pool of London area was slightly different to that of the traditional City, and argued that this warranted the increased flexibility on development of ground level use by cafes and restaurants etc. to utilise a part of the riverside that is currently isolated. They emphasised that their ideas for the Pool of London represented nothing more than a vision and had not been submitted as a plan.

A Member explained that they were strongly in support of regeneration of the Pool of London and were interested to hear views on the appropriateness of the riverside sites for social housing. A Member interjected to raise concerns over the appropriateness of detailed discussions relating to specific sites, commenting that such detailed questions towards a developer's proposals were not appropriate for a non-public session of a sub-committee tasked with forming planning policy. The Member expressed concerns that the non-public session would prejudice members' ability to consider future planning applications. Northern & Shell explained that their intention was simply to present ideas to the Sub-Committee that they hoped would contribute to the policy debate. The Chairman recognised the danger of misconceptions in this regard, supported the Member's views on the importance of transparency and noted that all interested parties at the Pool of London workshop had been given equal opportunity to present ideas to the Sub-Committee and so no preferential treatment had been allowed to Northern & Shell. The Director of the Built Environment explained that this presentation aimed to inform the Sub-Committee's thinking as part of the local plan review process for the City as a whole and for the Pool of London in particular, emphasising that no detailed discussion over Northern and Shell's site proposals were appropriate.

A Member asked if this was the only option that would overcome the constraints on servicing. PLP explained that research they had conducted on Billingsgate found that large vehicles were forced to stop on the road, whilst only smaller vehicles could gain access to that part of the riverside. The inclusion of the cycle lane on Lower Thames Street was exacerbating the issue further. PLP considered there was a strong logic for basement servicing access for all the buildings in the area as part of a comprehensive approach. The Director of the Built Environment noted that improving servicing was a clear policy objective.

Members agreed that the Pool of London area required addressing. The Chairman noted the comparison with the utilisation of the river on the South Bank and illustrated his dissatisfaction with the current state of the riverside in the area.

The Director of the Built Environment confirmed that officers would bring bullet-point policy options for the Local Plan Areas of Change (including the Pool of London area) to the Sub-Committee prior to recess. (3)

A Member requested that notes of the Pool of London workshop held in April be circulated, including details of attendees and parties that had been invited to speak to the Sub-Committee should they wish to. (4)

RESOLVED – That Northern & Shell and PLP be heard.

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

A Member asked if it would be feasible to have a policy that made demands around servicing considerations. The Director of the built Environment confirmed that this was the intention.

10. ANY OTHER NON-PUBLIC BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

A Member requested an update on policies to be brought to the next Sub-Committee. The Director of the Built Environment indicated that this meeting would consider office policies, design, views and tall buildings. (5)

A Member raised their concerns over potential accusations of Member lobbying and noted that the proposals brought to this meeting knowingly conflicted with the policy restricting residential development. The Member illustrated objections to the item being presented on the agenda for this sub-committee and particularly in the non-public session. The Chairman reiterated that equal opportunity had been provided for all developers and advice had been sought from officers to ensure that the process remained fair and transparent. The Town Clerk explained that the item was scheduled in the non-public session following advice from officers that it would contain commercially sensitive information that would not be suitable for publication. The Chairman noted that developers were entitled to give their views, regardless of whether or not they contradicted the Corporation's policies.

The meeting ended at 11.56 am

Chairman

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