



Local Plans Sub (Planning and Transportation) Committee

Date: TUESDAY, 20 OCTOBER 2020

Time: 1.45 pm

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)
<https://youtu.be/SRVWo650GEY>

Members: Deputy Alastair Moss (Chair) Deputy Jamie Ingham Clark
Oliver Sells, QC (Deputy Chairman) Shravan Joshi
Randall Anderson Graham Packham
Deputy Keith Bottomley William Upton, QC
Christopher Hill

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Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/SRVWo650GEY>

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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 agree the public minutes of the meeting held on 10 February 2020.

For Decision
(Pages 1 - 4)
4. **CITY PLAN 2036: REVISIONS TO PRE-SUBMISSION DRAFT PLAN**
Report of the Director of the Built Environment.

For Decision
(Pages 5 - 50)
5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
6. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE Monday, 10 February 2020

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at on Monday, 10 February 2020 at 11.00 am

Present

Members:

Sheriff Christopher Hayward (Deputy Chairman) (In the Chair)
Randall Anderson
Deputy Keith Bottomley
Christopher Hill
Shravan Joshi
Graham Packham
William Upton QC

Officers:

Alistair MacLellan	- Town Clerk's Department
Paul Beckett	- Department of the Built Environment
Adrian Roche	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
John Harte	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Michelle Price	- Department of the Built Environment

1. APOLOGIES

Apologies were received from Deputy Alastair Moss and Deputy Jamie Ingham-Clark.

Sheriff Chris Hayward was in the Chair.

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

There were no declarations.

3. MINUTES

RESOLVED, that the minutes of the meeting held on 3 February 2020 be approved as a correct record subject to the following amendments.

- The reference to Whitefriars (p.4 of the agenda pack) be amended to note the area contained a number of *characterful* buildings and reference be made instead to the lack of trees and greenery.
- The reference to ensuring new developments could be connected to Citigen (p.5 of the agenda pack) be amended to reflect the Member's point that this imposed an additional cost on developers.

Matters Arising Liverpool Street

In response to a comment from a Member, officers agreed to include reference in the Local Plan noting that the City would need Liverpool Street to have appropriate additional capacity in future years.

4. CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED SUBMISSION VERSION OF CITY PLAN 2036.

Members discussed a report of the Director of the Built Environment regarding the City of London Local Plan Review: Proposed Submission Version of City Plan 2036 and the following points were made.

- An officer noted that Members had discussed the issue of housing at the last meeting and the current report had been prepared in response to those discussions. Officers noted that short term government housing targets were difficult to align with a 15-year forward plan, and Members were asked to bear this in mind. The officer continued, noting that options were set out within the report at paragraphs 14-19.
- The Deputy Chairman (in the Chair) noted the comments made by the Chairman by email to those present that he supported the approach set out in paragraphs 15-16 (amend supporting text and amend policy) but did not feel that there was sufficient evidence at present to justify the identification of additional residential areas set out at paragraph 17 .
- A Member noted an issue with national policy approaches being pushed down to individual local authorities with no consideration of local circumstances. In his view, this meant the Local Plan needed to address annual housing targets and mitigate the potential impacts for the City.
- Officers noted that the City's own monitoring showed it had met long-term housing delivery targets but was less successful in meeting short-term targets due to private housing market volatility. The Government's Housing Delivery Test was reported retrospectively over three-year periods and the City did not meet this Test in relation to the three years to March 2018. They acknowledged that this was a problematic metric for the Plan's forward-looking 15-year period.
- A Member commented that the City should publish metrics of the number of residential units delivered against those permissions granted by the City. Moreover the issue regarding housing was not one of numbers of units, but rather their affordability. This could only be addressed by a pan-London approach to central government. With that in mind, the Member was supportive of paragraphs 15-16 in the report (amending City Plan 2036 supporting text and amending City Plan 2036) accordingly.
- A Member was wary regarding the enforceability of site allocations and cautioned against committing to an early review, and instead advised that the Plan should simply commit to a review in five years' time.

- A Member noted that he would be supportive of using Built to Rent to encourage delivery of residential units, without losing office space in the longer term. He felt that residential zones within the City would encourage a greater mix.
- A Member, in contrast, noted that he would not support the adoption of zones, and rather if the City could demonstrate that a Build to Rent approach would satisfy government policy, then it should do so.
- In response to the comments regarding residential zones, officers noted that the City Property Association had commented in its submission to the draft Plan that, in appropriate circumstances, a more flexible approach to the protection of existing office space could be taken in residential areas. The City's ambition regarding office space was outlined at paragraph 16.
- In response to a comment from a Member, officers advised that a Planning White Paper was forthcoming this Spring which might further change the national context. Therefore a reasonable interim approach could be to submit the draft Plan this year and await an assessment of any required changes by the inspector. It was possible to draft a case which could lead to more delivery of housing without site allocations. Officers concluded by noting that the adoption of site allocation at this stage could result in a delay to the Local Plan which was not in the City's interest.
- In response to Members concerns regarding a live/work approach, including the negative experience of other London boroughs, officers noted that co-living was a different concept to live/work units which seeks to provide higher quality, student-like accommodation for young professionals across London.
- The Chairman summarised the discussion, noting that Members were broadly content with the approach set out at paragraphs 15-16 (amend supporting text and amend policy) but did not feel that there was sufficient evidence at present to justify the identification of additional residential areas set out at paragraph 17 . The Chairman concluded by requesting that officers incorporate those comments made by Members at the meeting in the final iteration of the Plan.
- Officers noted that the revised Plan would be submitted to the Planning and Transportation Committee for approval.
- In response to a question, officers noted that they were confident the Plan was well aligned with strategic aims of the forthcoming London Plan, though uncertainty over the housing delivery performance would need further discussions.

RESOLVED, that the report be received.

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

There were no questions.

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

There was no other business.

The meeting ended at 11.38 am

Chairman

Contact Officer: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 20/10/2020
Subject: City Plan 2036: Revisions to pre-Submission Draft Plan	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Peter Shadbolt, Department of the Built Environment	

Summary

The draft Local Plan, titled City Plan 2036, was agreed for Regulation 19 pre-submission consultation by the Court of Common Council at its meeting on 21st May 2020. Local Plan regulations at that time prevented consultation taking place without making physical copies of the Plan available for inspection. Amendments to the Regulations in July 2020 have now enabled a website only consultation.

Further changes to the Plan are now required prior to the consultation taking place to address revisions to permitted development rights and the Use Classes Order, which came into effect on 31st August and 1st September 2020; to acknowledge the short term impacts of the Covid-19 pandemic, whilst emphasising that the medium to longer term fundamentals underpinning the City's economic success remain in place; to update the Plan to reflect the City's climate ambitions in the newly adopted Climate Action Strategy; and to make minor factual updates.

Recommendation(s)

Members are asked to:

- Agree the proposed changes to the pre-submission draft Local Plan set out in Appendix 1, for onward consideration by Planning & Transportation Committee.

Main Report

Background

1. The Proposed Submission City Plan 2036 was considered by the Planning and Transportation Committee at an informal virtual meeting on 31st March 2020. The Plan was then approved for pre-submission consultation by Policy & Resources Committee on 7th May 2020 and Court of Common Council on 21st May 2020. Formal pre-submission consultation was delayed due to Covid-19 restrictions which prevented the Corporation making the Plan and supporting documents available for physical inspection in the City. Amendments to the Town and Country Planning (Local Planning) regulations in July 2020 have now temporarily removed the requirement for copies of the Plan to be available for physical inspection.

The need for further Plan refinement

2. In late July 2020, the Government laid a series of new regulations before Parliament, making changes to permitted development rights and to the 1987 Use Classes Order. These changes came into effect on 31st August 2020 and 1st September 2020. To ensure that the Local Plan is sound and reflects these changes to national planning policy, further refinements to the draft Local Plan are proposed. It is also proposed that adjustments are made to address some of the short term economic, social and health and wellbeing impacts of the Covid-19 pandemic, to update references in the Plan to the City Corporation's Climate Action Strategy which has now been adopted and to make minor factual updates.

Use Classes Order

3. A revised Use Classes Order came into effect on 1st September 2020. A report detailing the changes to the Use Classes Order and permitted development rights, and the implications for the City of London, was considered by the Planning & Transportation Committee on 8th September 2020. The most significant change is the creation of a new Commercial, Business and Service Uses class, Class E, which replaces the B1 business use class and the A1, A2 and A3 retail use classes. A change of use within the E class is not considered development and is not, therefore, subject to planning control.
4. The Proposed Submission draft Local Plan was prepared on the basis of the previous 1987 Use Classes Order and has a number of policies which specifically reference the Use Classes Order, seeking to manage how sites and buildings change over time. The key policy areas where change is required are:
 - a. **Protection of office accommodation.** The proposed amendments reflect the potential for change within the E Use Class, whilst continuing to emphasise the continuing need to promote and retain a critical mass of office accommodation in the City. Emerging Local Plan policy already allows for greater flexibility for other commercial uses at basement and ground floor level in line with the ambitions of the new Use Classes Order and substantive change to the policy approach is not considered necessary.
 - b. **Retail provision.** The Proposed Submission draft Local Plan seeks to concentrate A1 retail within the Principal Shopping Centres (PSCs), with retail also encouraged within the Retail Links. Isolated A1 retail units, in particular, are protected. The E Use Class is intended to provide greater flexibility to allow changes of use within town centres to retain their vitality and viability, but removes the ability to manage the change between retail uses and between retail, office and some other commercial uses. Amendments are suggested to the Local Plan's retail policies which continue to promote the role of the City's PSCs as centres for traditional shops, providing comparison and convenience retail. Most City developers, landowners and occupiers are expected to continue to see the benefits of providing active frontages and the additional vibrancy and income that comes from a mix of ground floor uses, so significant change is not expected, particularly within the PSCs.

Covid-19 Impacts

5. The Proposed Submission draft Local Plan was prepared prior to the outbreak of the Covid-19 Pandemic, which has had significant health, well-being, environmental and economic impacts locally and globally. Although these impacts are expected to be relatively short term, the pandemic is leading to behavioural changes. Some of these changes are temporary, but some are likely to become established as part of the 'new normal'. The acceleration of existing trends and the creation of new trends both need to be taken into account in the emerging Local Plan which is planning not just for the next few years but the medium and longer term. Therefore, the Plan needs to look beyond the current pandemic to a period when the City is once more a vibrant base for a wide range of existing and new businesses, operating more flexibly to meet the changing business environment, space needs and lifestyle expectations of their workforce.
6. The immediate impact of Covid-19 has been to shift much of the City's business online with many City workers working remotely, and consequently significant reductions in journeys into the City and footfall within it. However, although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.
7. Contextual changes and a reiteration of the Local Plan's flexible and adaptable strategy (which already seeks to facilitate a healthy and inclusive City), new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets are considered appropriate at this stage. The Local Plan is continually monitored through a robust monitoring programme and if this evidence suggests a need for wider review, this can be considered through a future review of the Plan.

Climate Action Strategy

8. The Court of Common Council on 8th October 2020 approved a Climate Action Strategy for the City Corporation, which sets out a radical programme of measures to:
 - a. Reduce carbon emissions and a trajectory towards achieving a zero carbon City Corporation and wider City of London by 2040.
 - b. Ensure the City Corporation's buildings and public realm are resilient to more extreme weather conditions and rising sea levels.
9. The Climate Action Strategy introduces a new way of working where the risks and opportunities arising from climate change are integrated into all City Corporation decision making. Through this strategy, the City Corporation will secure and strengthen its position as a world leading financial and professional

services centre, with a public realm and buildings which are attractive places to work, live, study and visit.

10. The Proposed Submission draft Local Plan already addresses the need to reduce carbon emissions, increase resilience and has, at its heart, the delivery of a sustainable and green city. The delay in consulting on the Plan and the adoption of the Climate Action Strategy provide an opportunity to refine this approach, ensuring a consistent and strong message on climate is presented by the City Corporation.

Proposed Changes

11. Appendix 1 sets out a schedule of changes to the Proposed Submission draft Local Plan. The schedule identifies those changes that are required to respond to the Use Classes Order, Covid-19 and the Climate Action Strategy. The proposed changes also take account of advice received from a Planning Inspector who held a virtual advisory visit with officers in July, albeit his advice is not binding on the Inspector who will subsequently carry out the independent examination of the City's Local Plan. These amendments are considered to be material changes to the Plan that was previously agreed by the Court and, as a result, they will require the express approval of Planning & Transportation Committee, Policy & Resources Committee and Court of Common Council. Members are asked to agree the schedule of changes for consideration firstly by Planning & Transportation Committee. The Grand Committee will then be asked to approve the schedule for consideration by Policy & Resources Committee and Court of Common Council.
12. Separately, the schedule also identifies a number of factual updates to the Proposed Submission draft Plan. These changes are non-material and, in line with the authorisation previously given by the Grand Committee, do not need express approval, but are included here for completeness.

Next Steps

13. A further meeting of the Sub-Committee has been scheduled for 4th November 2020. This meeting will provide an opportunity, if required, for further discussion of the proposed changes or refinement of proposed changes following discussion at the meeting today.
14. Following consideration by the Sub-Committee, the schedule of changes to the Proposed Submission draft Plan will be considered by:
 - Planning & Transportation Committee on 17th November 2020
 - Policy & Resources Committee on 10th December 2020
 - Court of Common Council on 14th January 2021
15. Following consideration at Court, the Proposed Submission draft Plan will be issued for Regulation 19 pre-submission consultation in late January 2021 or early February 2021 for a period of 6 weeks. Following consultation, and subject to the agreement of the Planning & Transportation Committee, the Plan would then be submitted, prior to the summer recess, to the Planning Inspectorate for

Public Examination. Formal Examination hearings are then likely to take place later in 2021, with adoption of the new Local Plan now scheduled by mid-2022.

16. The Government is currently consulting on fundamental changes to the planning system through its Planning White Paper. The City Corporation's response to these proposals will be considered by Planning & Transportation Committee on 27th October 2020. The White Paper suggests transitional provisions for those local planning authorities that have submitted a plan for public examination at the time revised planning legislation is enacted which would allow a submitted local plan to progress to adoption. The timing of legislation is uncertain, but it is expected to be progressed rapidly, highlighting the importance of ensuring that the City's Plan is submitted for examination in late spring/early summer 2021.

Corporate & Strategic Implications

17. The review of the Local Plan is informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The Proposed Submission draft Plan provides a spatial planning framework to support the Climate Action Strategy and key corporate capital projects, along with proposals to ensure a sufficient supply of business space to meet future needs. It also aligns with the adopted Transport Strategy.

Conclusion

18. The draft Local Plan was agreed for Regulation 19 pre-submission consultation by the Court of Common Council at its meeting on 21st May 2020. Local Plan regulations at that time prevented consultation taking place without making physical copies of the Plan available for inspection. Amendments to the Regulations in July 2020 have now enabled a website only consultation.
19. Changes to permitted development rights and the Use Classes Order, which came into effect on 31st August and 1st September 2020, mean that further changes to the Proposed Submission draft Plan are now required to ensure it is compliant with national planning policy. Additional changes are needed to acknowledge the short term impacts of the Covid-19 pandemic, whilst emphasising that the medium to longer term fundamentals underpinning the City's economic success remain in place. The City Corporation has also adopted its Climate Action Strategy and updates are proposed to reflect the strategy. Minor, non-material, factual updates are also proposed.

Appendices

Appendix 1: Schedule of proposed amendments to the Proposed Submission version of the City of London Local Plan

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Schedule of proposed changes to the version of City Plan 2036 approved by Court of Common Council in May 2020		
Policy/paragraph	Proposed change	Reason for change
Introduction: Why is the City preparing a new Local Plan? Paragraph 1.2.3	Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system <u>through its planning reform agenda, with notable changes being made to permitted development rights and the Use Classes Order during 2020. As a result, a number of</u> and some policies need updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London is reviewing the London Plan, which provides a strategic planning framework for London for the period up to 2041.	Factual update
Introduction: Figure 1 (after paragraph 1.3.3)	Update timetable in Figure 1 to indicate: <ul style="list-style-type: none"> • Publication (Early 2021) • Submission (Spring/Summer 2021) • Examination (Winter 2021/22) • Adoption (Spring/Summer 2022) 	Factual update
Introduction: Policy context Paragraphs 1.3.5 – 1.3.6	Policy context 1.3.5. <u>This Plan is being prepared in an era of significant and rapid change and has been deliberately drafted to provide a flexible policy framework.</u> Within this wider framework, the Local Plan can provide an environment which encourages appropriate development and is responsive and adaptable to change. 1.3.6 <u>In particular, the Plan seeks to provide a flexible, resilient policy framework which responds to three fundamental health and well-being, environmental and economic influences: Covid-19, climate change, and the UK's departure from the European Union.</u>	To reflect impacts arising from the publication of the City Corporation's Climate Action Strategy, the Covid-19 pandemic and updated trading relationships

Climate change

1.3.7 The threat from climate change is one of the most serious threats we face today. It extends beyond environmental challenges and has the potential to affect economic prosperity, social justice and global stability. Wide ranging responses are essential, encompassing individual local actions, local, strategic and national government programmes, business and community scale initiatives and global agreements. Scientific evidence indicates that the climate is already changing, and that action is needed to limit global warming to 1.5 degrees.

1.3.8 The City Corporation has long been a champion of clean air, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal well-being. It has in 2020 adopted a Climate Action Strategy which sets out a pathway to achieving net zero emissions for both the City Corporation's activities and the wider activities of businesses and residents in the City of London. The Strategy and, more importantly, the actions outlined will ensure the Square Mile and City Corporation achieve net zero carbon by 2040 and make a positive contribution to tackling climate change, are resilient to the risks of climate change and seize the opportunities presented by the transition to a low-carbon economy.

Covid-19 pandemic

1.3.9 Much of this Plan was drafted prior to the outbreak of the Covid-19 pandemic, which has had significant health, well-being, environmental and economic impacts locally and globally. As medical treatments are discovered and rolled out, including potential vaccines, the severity of these health impacts is expected to reduce and communities will recover in the medium term. However, the pandemic is also leading to behavioural changes; some are temporary, but some are likely to become established as part of the 'new normal'. The acceleration of existing trends and the creation of new trends both need to be taken into account when planning for the medium and longer

term. Therefore, the Plan is looking beyond the current pandemic to a period when a probable vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation which harnesses the potential of existing and new trends.

1.3.10 Throughout its long history the City of London has been a centre for creative innovation and collaboration, bringing business and people together. The Covid-19 pandemic has in the short term shifted much of the City's business online with many City workers using modern technology to work from home, and consequently significant reductions in journeys into the City and footfall within it. Whilst the use of digital technology and remote working will remain important to the success of many City businesses in the future, reliance solely on remote working can have longer term drawbacks as it can limit the scope of the creative innovation, collaboration and informal business relationships that the City thrives upon. Therefore, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly to meet the changing business environment, space needs and lifestyle expectations of their workforce. The return of City workers will bring vitality to provide a boost to businesses that rely on high footfall, including retail, food and beverage and support services to the City's offices, that have been particularly affected by Covid-19.

1.3.11 Although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.

	<p><u>UK trading relationships</u></p> <p><u>1.3.12</u> As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on <u>the international and national economic considerations and other external policies, particularly the United Kingdom's future trading relationship with the European Union and the rest of the world. context including future trading relationships. The UK's departure from the European Union is leading to new trading relationships and patterns. The City's reputation for expertise and innovation will be particularly important as it adapts its existing strengths in financial and professional services, and develops new strengths, to suit changing global circumstances.</u></p> <p>1.3.613. The Local Plan is influenced by national and London-wide planning policies and guidance, as well as plans and strategies produced by neighbouring boroughs and a range of statutory bodies.</p>	
<p>Introduction: National planning policy and guidance New paragraph following current paragraph 1.3.7</p>	<p><u>1.3.xx The Government's planning reform agenda has resulted in a number of changes to national legislation and guidance. These changes, including those brought forward during 2020 to permitted development rights and the Use Classes Order, have been incorporated into this Plan. The Government has published a Planning White Paper outlining further fundamental changes to the planning system in England which would impact upon the preparation and content of local plans and the operation of development management. These reforms, if enacted, will be considered through a subsequent review of the City of London's Local Plan.</u></p>	<p>Factual update</p>
<p>Introduction: The London Plan and other Mayoral strategies Paragraph 1.3.8</p>	<p>1.3.8. The Mayor of London has a duty to prepare a spatial development strategy, the London Plan, and to keep it under review. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan for the City of London, along with the City's</p>	<p>Factual update</p>

	Local Plan. <u>The Local Plan has been prepared in alignment with the Mayor's Intend to Publish London Plan (December 2019).</u>	
Introduction: City Corporation strategies Paragraph 1.3.15	1.3.15. In particular, the Local Plan is one of the mechanisms through which the City Corporation's Corporate Plan <u>and Climate Action Strategy</u> will be implemented. The Corporate Plan sets out the City Corporation's overarching strategic direction and is structured around the three pillars of society, economy and environment. Although the Corporate Plan has a shorter time horizon than the Local Plan (2018-23), it is a visionary and forward-looking document and City Plan 2036 complements and helps deliver many of its objectives. <u>The Climate Action Strategy set out the City Corporation's pathway to achieve a zero carbon City by 2040.</u>	Factual update
Vision, Strategic Objectives and Spatial Strategy: 3.1 Contribute to a Flourishing Society Paragraph 3.1.2	3.1.2. The City's population will enjoy good health and wellbeing. <u>The health and wellbeing of the City's communities will be integral to the design and delivery of new buildings, open spaces and the wider public realm, helping the City recover from the Covid-19 pandemic and address the implications of climate change.</u> Health inequality across the City will be reduced. Workers and residents will have access to a range of health services within the Square Mile and beyond. Partnership working with businesses and organisations both inside and outside the City will effectively tackle the wider causes of poor health by substantially improving the City's air quality, promoting the recreational benefits of a healthy lifestyle, and ensuring inclusive access to good quality open spaces and recreational opportunities.	To reflect impacts arising from the Covid-19 pandemic
Vision, Strategic Objectives and Spatial Strategy: 3.2 Support a Thriving Economy Paragraph 3.2.1	3.2.1. The City will remain the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas <u>and flexible ways of working</u> , including in the technology and creative sectors, and delivering inclusive and sustainable growth and prosperity for its communities, London and the UK.	To reflect impacts arising from the Covid-19 pandemic

<p>Vision, Strategic Objectives and Spatial Strategy: 3.2 Support a Thriving Economy Paragraph 3.2.3</p>	<p>3.2.3. The City will be open to new business, new ideas and innovations and new ways of working, building upon the experience and lessons learned through the Covid-19 pandemic. New reflected in business floorspace that is will be flexible and adaptable to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. Office space will be complemented by other accessible commercial, cultural and leisure uses adding vibrancy and animation to the City's streets and benefitting the City's diverse communities.</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Vision, Strategic Objectives and Spatial Strategy: 3.2 Support a Thriving Economy Paragraph 3.2.5</p>	<p>3.2.5. The quality and quantity of City's retail facilities offer will adapt to changing demands, offering a range of complementary services to the City's wider business and cultural offer and contributing to the City's development as continue to increase to meet rising demand, as the City evolves into an evening and 7-day a week retail, leisure and cultural destination. Retail growth will be focused on the Principal Shopping Centres of Cheapside, Liverpool Street/Moorgate, Leadenhall Market and Fleet Street. Smaller retail and cultural uses units will be provided across the City, animating ground floor spaces and meeting local worker and resident needs.</p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>
<p>Vision, Strategic Objectives and Spatial Strategy: 3.3 Shape Outstanding Environments Paragraph 3.3.2</p>	<p>3.3.2. The City's streets will provide an attractive and safe environment for walking and cycling. Pavement widening and reallocation of road space for pedestrian or cycle use, allied with increased planting and greenery, will provide more space for moving around, building on the initiatives put in place during the Covid-19 pandemic. Traffic reduction and improvements to the City's streets and junctions will transform the safety, look and feel of the City's street network.</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Vision, Strategic Objectives and Spatial Strategy: 3.3 Shape Outstanding Environments</p>	<p>3.3.5. The City will remain a centre of world class architecture with flexible, and and healthy buildings and a high quality of public realm for people to admire and enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline and provide for the health and wellbeing of workers, adding to the tall building cluster in the east of the City.</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>

Paragraph 3.3.5		
Vision, Strategic Objectives and Spatial Strategy: 3.3 Shape Outstanding Environments Paragraph 3.3.8	3.3.8. The City's buildings, public realm and transport will be highly sustainable, designed to make efficient use of natural resources, minimise emissions and be resilient to natural and man-made threats. In partnership with public and private sector organisations the City will adopt new technologies to transition to a zero emission City by 2050 2040, in line with the ambitions set out in the City Corporation's Climate Action Strategy.	Factual update
Vision, Strategic Objectives and Spatial Strategy: 3.3 Shape Outstanding Environments Paragraph 3.3.9	3.3.9. The City will be a much greener place, with additional planting in and around new and existing buildings and the City's streets and spaces, enhancing the environment, contributing to health and wellbeing and mitigating the impacts of pollution. New open and amenity spaces will be created including through the creation of new pedestrian routes, accessible and permeable buildings, and the provision of amenity space at upper or roof levels. Public access to private open space will be encouraged. Biodiversity will be increased by the inclusion of wildlife-friendly features in new and existing open spaces and buildings.	To reflect impacts arising from the Covid-19 pandemic
Vision, Strategic Objectives and Spatial Strategy: 3.3 Shape Outstanding Environments Paragraph 3.3.12	3.3.12. To shape the future City, ensuring that it is physically and virtually well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets.	To reflect impacts arising from the Covid-19 pandemic
Paragraphs 3.4.3, 7.5.2 & Strategic Policy S20	Change Sir John Cass School to The Aldgate School	Factual update
Vision, Strategic Objectives and Spatial Strategy:	... Freight and servicing deliveries will be reduced through off-site consolidation, the re-timing of deliveries outside of peak hours and joint working with occupiers. Pedestrian movement and permeability will be improved and with priority given to pedestrians	To reflect impacts arising from the Covid-19 pandemic

3.4 Key Areas of Change: City Cluster Paragraph 3.4.4	<u>through the reallocation of road space</u> on key routes during daytime. <u>Opportunities for cycling to, from and within the Cluster will be improved alongside measures to improve pedestrian access.</u> Links to public transport nodes and other parts of the City, including to the Elizabeth Line at Liverpool Street Station, will be improved.	
Vision, Strategic Objectives and Spatial Strategy: 3.4 Key Areas of Change: Smithfield and Barbican Paragraph 3.4.6	... Consolidation of the City Corporation’s wholesale markets onto a single site outside of the City will <u>potentially</u> allow the re-use of Smithfield Market for other uses compatible with its heritage status and the City Corporation’s ambitions for Culture Mile. St Bartholomew’s Hospital will remain a major centre of health excellence. <u>Additional greening, new open spaces and pedestrian and cycling priority in appropriate locations will reduce</u> the the potential for conflict between vehicular access to commercial and residential uses, <u>and allowing for more effective management of</u> the increased numbers of pedestrians will be effectively managed.	Factual update to reflect progress on Smithfield Public Realm proposals
Vision, Strategic Objectives and Spatial Strategy: Spatial Strategy Paragraph 3.5.2	3.5.2. The <u>Local Plan will be implemented alongside the policies and strategy of the London Plan and, particularly the London Plan’s principles of Good Growth.</u> The City Plan 2036 Spatial Strategy and the detailed policies that follow set out how this <u>the</u> balance <u>between commercial, residential, cultural and environmental aspirations</u> will be delivered and how the City of London will become a healthy, socially and economically inclusive City for all.	To reflect advice from a Planning Inspector during an advisory visit, in which he commented that reference should be made to the London Plan in the Spatial Strategy
Vision, Strategic Objectives and Spatial Strategy: Spatial Strategy Paragraph 3.5.3	3.5.3. Table 1 shows the scale of the projected growth in the main land uses in the City over the period 2016 to 2036. <u>These projections pre-date the Covid-19 pandemic but the fundamental advantages and principles underpinning growth in the City remain and, over the longer term life of this Plan to 2036, growth is expected in line with the projections.</u>	To reflect impacts arising from the Covid-19 pandemic

<p>Vision, Strategic Objectives and Spatial Strategy: Spatial Strategy</p>	<p>The City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK.</p> <ol style="list-style-type: none"> 1. Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City by 2050 2040, delivering further urban greening and improving air quality. 2. Delivering <u>sustainable growth following the Covid-19 pandemic including</u> a minimum of 2 million m² net additional office floorspace and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone. ... 5. Delivering at least 1,460 2,482 additional homes within the City by 2028/29 2035/36 to meet housing need and continuing to deliver new housing on City Corporation estates and other appropriate sites outside of the City. ... 	<p>Factual Update (point 1)</p> <p>To reflect impacts arising from the Covid-19 pandemic (point 2)</p> <p>To reflect advice from a Planning Inspector during an advisory visit (point 5)</p>
<p>Strategic Policy S1 - Healthy and Inclusive City: New paragraph before paragraph 4.1.16</p>	<p><u>4.1.xx. The design of buildings and spaces to maximise health outcomes is particularly important in light of the Covid-19 pandemic. The design of commercial buildings, outdoor spaces and residential developments should be flexible so that buildings and outdoor spaces can be reconfigured as necessary in response changing health and wellbeing requirements.</u></p> <p>4.1.16. Developers are encouraged to use established assessment methodologies to ensure that development contributes towards a healthy city. There are several accreditation systems that attempt to measure the health and well-being elements of building design, construction and operation and how these features impact on health and wellbeing.</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>

<p>Strategic Policy S1 - Healthy and Inclusive City: New paragraph at end of sub-section 'How the policy works'</p>	<p>Strategic Policy S1: Healthy and Inclusive City</p> <p>The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, education, recreation and leisure opportunities, by:</p> <p>...</p> <p>7. Encouraging the further provision of both public and private health facilities. <u>Conditions may be attached to permissions for public healthcare facilities to ensure their future retention;</u></p> <p>...</p> <p><u>4.1.xx. Changes to the Use Classes Order introduced in September 2020 have included certain health and medical services such as clinics, health centres, creches, day nurseries and day centres within the new Use Class E. This means that such uses could be converted to a range of other Class E commercial, business and service uses without planning permission. Given the limited opportunities to replace such facilities in the City, conditions are likely to be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.</u></p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>
<p>Policy HL2 - Air Quality</p>	<p>Policy HL2: Air Quality</p> <p>1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment.</p> <p>2. Development that would result in a worsening of the City's nitrogen dioxide or PM10 and PM2.5 pollution levels will be <u>resisted</u> refused.</p> <p>...</p>	<p>To reflect advice from a Planning Inspector during an advisory visit, in which he commented that the current wording may not be realistic and that elsewhere in the</p>

		Plan, the term 'resisted' is used
Policy HL5 - Location and protection of social and community facilities: Paragraph 4.1.37	4.1.37. Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services. As such they make a significant contribution to people's mental, spiritual and physical well-being, sense of community, learning and education. Library and educational facilities and those that support the City's business and cultural roles are particularly important. <u>A definition of social and community facilities, with reference to the Use Classes Order, is provided in the glossary.</u>	To reflect changes to the Use Classes Order introduced in September 2020
Policy HL7 - Sport and recreation: New paragraph after paragraph 4.1.49	4.1.49. The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. <i>[moved to new paragraph]</i> <u>4.1.xx.</u> The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan. <u>Following changes to the Use Classes Order introduced in September 2020, existing gyms and other indoor recreational uses could be converted to a range of alternative Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.</u>	To reflect changes to the Use Classes Order introduced in September 2020
Policy HL9 - Health Impact Assessment (HIA):	4.1.54 HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. <u>The Covid-19 pandemic has highlighted the important</u>	To reflect impacts arising from the Covid-19 pandemic

Paragraph 4.1.54	<p><u>role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.</u></p>	
Strategic Policy S2 - Safe and Secure City	<p>Strategic Policy S2: Safe and Secure City</p> <p>The City Corporation will work with the City of London Police and the London Fire Brigade to ensure that the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently by:</p> <ol style="list-style-type: none"> 1. Minimising the potential for crime and anti-social behaviour by <u>ensuring that development proposals</u> designing out crime and encouraging a mix of uses and natural surveillance of streets and spaces; 2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole; 3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures; 4. <u>Ensuring that development proposals take</u> Taking account of the need for resilience in developments so that residential and business communities are better prepared for, and better able to recover from, emergencies (including the promotion of business continuity measures); 5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must prepare and submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building. 	To reflect advice from a Planning Inspector during an advisory visit, in which he commented that it was unclear whether or not some parts of Policy S1 are intended to apply to development proposals.

<p>Strategic Policy S3 - Housing: Paragraphs 4.3.6 – 4.3.8</p>	<p>Strategic Policy S3: Housing</p> <p>The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City’s needs, by:</p> <p>1. Making provision for a minimum of 1,460 <u>2,482</u> net additional dwellings between 2019/20 and 2028/29 <u>2035/36</u>:</p> <ul style="list-style-type: none"> • encouraging new housing development on appropriate sites in or near identified residential areas; • protecting existing housing where it is of a suitable quality and in a suitable location; • exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and • refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2. <p>....</p> <p>Housing requirement</p> <p>4.3.6 The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs.</p> <p><i>[moved to new paragraph]</i></p> <p>4.3.xx. The London Plan strategic framework includes Policy SD5, which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context, it requires the City of London to deliver 1,460 new homes during the</p>	<p>To reflect advice from a Planning Inspector during an advisory visit, in which he commented that the housing requirement needs to be identified for the whole Plan period up to 2036 (albeit for the period after 2028/29 this may need to alter to ensure general conformity with any subsequent review of the London Plan)</p>
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	<p>period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. <u>In Policy S3 the City’s housing requirement is expressed as a total of 2,482 dwellings for the Plan period to 2036, which represents the 10-year London Plan target of 1,460 dwellings plus the combined annual average of 146 dwellings for the seven years post 2028/29 (1,022 dwellings). The housing requirement beyond 2028/29 will be kept under review and may need to alter to ensure general conformity with any subsequent review of the London Plan.</u> The London Plan also includes a target that 740 units should be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period.</p> <p>4.3.7 Different assessment methods provide different figures for local housing need. The City’s 2016 SHMA assessed the level of housing need, including the needs of those requiring supported and specialised accommodation in the City, over the period 2014-36, using the latest population and household projections. The SHMA identified an objectively assessed need for an annual average of 126 dwellings per year. Using the national standard method for assessing local housing need <u>at the time of preparing this Plan</u>, the City’s minimum annual local housing need figure over the ten-year period from 2020 to 2030 would be 112.</p> <p>4.3.8 ...The City Corporation recognises that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the City’s SHMA. This Local Plan therefore seeks to meet the London Plan housing target <u>of 1,460 dwellings, which has been applied to the whole of the Local Plan period as explained above.</u></p>	
<p>Strategic Policy S3 - Housing</p>	<p>Strategic Policy S3: Housing The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City’s needs, by:</p>	<p>To ensure consistency with the London Plan, which has changed</p>

	<p>...</p> <p>2. Ensuring sufficient affordable housing is provided to meet the City’s housing need and contributing to London’s wider housing needs by:</p> <ul style="list-style-type: none"> • ensuring the delivery of a minimum of 50% affordable housing on public sector land; and • requiring residential developments with the potential for more than 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash-in lieu payment, if evidence is provided to the City Corporation’s satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and • providing a mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale. 	
<p>Strategic Policy S3 - Housing: New paragraphs following paragraph 4.3.12</p>	<p>4.3.12 The City Corporation will continue to support the delivery of new market and affordable housing on its own housing estates and other appropriate land holdings outside the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London’s wider housing needs.</p> <p><i>[moved from current paragraph 4.3.8]</i></p> <p><u>4.3.xx. The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London.</u> The City Corporation provides over 1,500 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City.</p>	<p>To reflect advice from a Planning Inspector during an advisory visit, in which he commented that the Plan could provide a clearer narrative on how the City Corporation is meeting housing needs on land outside the City of London</p>

	<p><u>4.3.xx. The City Corporation has committed to play a leading role in tackling the housing shortage in London with a pledge to build hundreds of new social homes and thousands of additional mixed tenure homes.</u> The City Corporation’s Housing Strategy 2019-23 aims to deliver at least 700 new <u>social</u> homes on City-owned land and housing estates, <u>a 25% increase in stock that will include three estates outside the City with potential for renewal and expansion.</u> Where these homes are outside of the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet address both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a further 3,000 mixed tenure homes on other sites in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs.</p> <p><u>4.3.xx. The City Corporation’s plans to build new homes have encouraged both public and private sector partners to propose development opportunities and potential joint ventures. Options to increase the supply of new homes beyond the City Corporation’s own sites are being explored. The planned consolidation of the City Corporation owned and managed wholesale markets (Smithfield Meat Market, Billingsgate Fish Market and New Spitalfields Fruit and Vegetable Market) onto one site in Dagenham would provide an opportunity for mixed use redevelopment which could include housing. Billingsgate is a 5-hectare site next to Canary Wharf and New Spitalfields is a 13-hectare site in Leyton.</u></p>	
Policy HS4 - Housing Quality Standards	<p>Policy HS4: Housing quality standards</p> <p>All new housing must be of a high-quality design and of a standard that facilitates the health and well-being of occupants and neighbouring occupants, and:</p> <ul style="list-style-type: none"> • meets London Plan housing space standards; • meets standards for Secured by Design or similar certification; and 	To reflect impacts arising from the Covid-19 pandemic

	<ul style="list-style-type: none"> • maximises opportunities for providing <u>communal</u> open and leisure space for residents; <u>and</u> • <u>provides amenity space for individual units, where possible including outdoor space.</u> 	
<p>Policy HS8 - Older Persons Housing: Paragraph 4.3.62</p>	<p>Policy HS8: Older persons housing</p> <p>The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:</p> <ul style="list-style-type: none"> • <u>making provision for a minimum of 170 net additional dwellings for older persons between 2019/20 and 2035/36;</u> • supporting development that meets the specific needs of older people; • supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living; • ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; • resisting development that involves the net loss of housing for older people. <p>...</p> <p>4.3.62 The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet identified needs. <u>Housing suitable for older persons, including sheltered housing, is provided by the City Corporation on its</u></p>	<p>To reflect advice from a Planning Inspector during an advisory visit, in which he commented that the Local Plan should reflect the London Plan’s City benchmark for specialist older persons housing of 10 units per year</p>

	<p><u>land and estates, inside and outside of the City. Provision outside the City may assist in meeting the need for older persons housing for City residents through nomination rights.</u> Specialist older persons housing should deliver affordable housing in line with Strategic Policy S3. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. This issue is addressed in Policy VT3.</p>	
<p>Offices – context: Paragraphs 5.1.5 - 5.16</p>	<p>5.1.5. The City lies wholly within London’s Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. <u>Prior to the Covid-19 pandemic, the GLA projected that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London’s rapidly growing population will also create the demand for more employment and for the space required to accommodate it.</u></p> <p><u>5.1.xx. The Covid-19 pandemic is having significant health, wellbeing, social and economic impacts globally. The City of London has not been immune to these impacts and has seen a significant shift in working patterns to remote working, with major reductions in City footfall and use of the City’s retail, leisure and cultural assets. Economic modelling by the GLA suggests a gradual return of economic activity and a return to economic and employment growth. At the same time, the fundamentals underpinning the City’s success, its locational advantages and the benefits of collaboration and co-operation remain. Alongside continued investor and developer interest in the City as a place in which to do business, these fundamentals suggest that the City will continue to prosper and, over the life of this Plan, will see further employment growth and a need for additional office floorspace.</u></p> <p>5.1.6. The United Kingdom’s exit from the European Union will <u>also</u> have short and long-term effects on economic and employment growth depending on the detail of future trading arrangements. Whatever those arrangements London’s strong underlying</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>

	<p>strengths mean that it is necessary to plan for continued growth to ensure that the City remains a global financial and professional services centre.</p> <p><u>5.1.xx. The City Corporation will continually review employment and office growth trends and the economic impacts of the Covid-19 pandemic and the UK's departure from the European Union and will bring forward a review of this Plan to address changing trends, where necessary.</u></p>	
<p>Strategic Policy S4 - Offices: New paragraph after paragraph 5.1.7</p>	<p>5.1.7. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 2,000,000m² is derived from the estimated growth in office employment between 2016 and 2036 and represents a 23% increase in floorspace.</p> <p><u>5.1.xx. Notwithstanding the short term impacts of the Covid-19 pandemic on occupier demand and construction activity, the City has a robust development pipeline. In March 2020, over 1,300,000m² of office floorspace was either under construction or permitted but not commenced. While the long term impacts of the pandemic on the office market are uncertain, it seems likely that many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be counteracted by a shift towards lower occupation densities and the provision of more breakout space within offices. The overall impact on floorspace demand may therefore be broadly neutral.</u></p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Strategic Policy S4 - Offices</p>	<p>Strategic Policy S4: Offices</p> <p>The City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by:</p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

	<p>....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. <u>Where necessary, conditions may be attached to permissions for new office floorspace to secure its long-term use for such purposes.</u></p>	
<p>Strategic Policy S4 – Offices: New paragraph after paragraph 5.1.13</p>	<p>5.1.13. The City Corporation has made an Article 4 Direction removing permitted development rights for the change of use of offices (B1a) to dwelling houses (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.</p> <p><u>5.1.xx. Changes to the Use Classes Order introduced in September 2020 mean that offices could be converted to a range of other Class E commercial, business and service uses without planning permission. Given that the largest past losses of office accommodation in the City have been to residential or visitor accommodation uses, this change is not expected to pose a significant risk to the City’s strategic role as a centre for financial and professional services. However, where permission is granted for office schemes that meet a specific identified need, conditions may be attached to ensure the impacts of any proposed later conversion of such space can be considered through the planning application process.</u></p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>
<p>Policy OF1 - Office Development: Paragraph 5.1.15</p>	<p>5.1.15. Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City’s economy include retail, leisure, education, health facilities and cultural uses. A mix of commercial land uses, in particular at ground floor and basement levels, may create active frontages enhancing an area’s vitality and provide important complementary services. <u>They also provide opportunities for collaboration and social interaction, which are key to the success of the City’s business clusters.</u></p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>

<p>Policy OF2 - Protection of Existing Office Floorspace: Paragraph 5.1.18</p>	<p>5.1.18. The protection of existing offices is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. Proposals involving the loss of office accommodation <u>that require planning permission</u> will need to be supported by robust evidence of marketing and viability to ensure that viable offices can be retained to meet future office need. <u>Following changes to the Use Classes Order introduced in September 2020, existing offices could be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.</u></p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>
<p>Policy OF3 - Temporary Meanwhile Use of Offices: Paragraphs 5.1.27- 5.1.28</p>	<p>Policy OF3: Temporary 'Meanwhile' Uses of Offices</p> <ol style="list-style-type: none"> 1. Temporary use of vacant <u>office commercial, business and service</u> buildings or and-sites ('meanwhile' uses) will be permitted where the proposed use would not result in adverse impacts on the amenity of the surrounding area or the primary business role of the City. Where temporary permission is granted it will be 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. <p><u>Reason for the policy</u></p> <p>5.1.27. Where office-buildings or sites in <u>Class E commercial, business or service uses</u> are vacant, and development is not expected in the short term, 'meanwhile' or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained, subject to the impact on surrounding uses.</p> <p><u>How the policy works</u></p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

	<p>5.1.28 ‘Meanwhile’ uses will be granted subject to conditions for a maximum of 36 months, after which the use will revert to office its prior lawful use. Applications to extend the period of the ‘meanwhile’ use or make it permanent will be considered against the criteria in Policy OF2 relevant policies in the Development Plan and will not be permitted unless it is demonstrated that the permanent loss of office floorspace the prior lawful use is acceptable.</p>	
<p>Retailing – context: Paragraph 5.2.3</p>	<p>5.2.3 The ways in which people shop and use retail facilities is-are changing and the City’s retail offer needs to adapt to address changing consumer and leisure habits, whilst also retaining a focus on centres as places to shop. <u>The Covid-19 pandemic has significantly reduced footfall in town centres and retail centres nationally and hastened the growth of online retailing, having short-term impacts on the vitality and viability of many retail and leisure facilities.</u> Retail centres that provide a diverse range of <u>town centre uses, including</u> shops, services and leisure activities are likely to be in a better position to respond to changing retail demand <u>and recover from the impacts of Covid-19.</u> In the City, as elsewhere, there has been an expansion of <u>experiential retail, leisure, and entertainment and mixed</u> uses, which can increase footfall at different times of the day and add to the visitor experience. Such uses are an important component of the City’s overall retail mix.</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Strategic Policy S5 – Retailing: Paragraphs 5.2.4 – 5.2.8</p>	<p>Strategic Policy S5: Retailing</p> <p>The City Corporation will seek to improve the quantity and quality of retailing and the retail environment, promoting the development of the City’s four Principal Shopping Centres (PSCs) and the linkages between them by:</p> <p>...</p> <p>2. Supporting proposals that contribute towards the delivery <u>of a minimum of 196,000 m² gross</u> of additional retail floorspace across the City to meet future demand up to 2036.</p> <p>...</p>	<p>To reflect impacts arising from the Covid-19 pandemic and changes to the Use Classes Order introduced in September 2020</p>

5. ~~Giving greater priority to~~ **Focusing comparison and convenience** shops (~~A1 uses~~) within the PSCs, with a broader mix of retail and appropriate town centre uses on the peripheries of the centres and the Retail Links.

...

5.2.4 Four Principal Shopping Centres (PSCs) have been identified which provide a variety of comparison and convenience shopping, ~~largely falling within the A1 use class~~, in the City of London: Cheapside, Fleet Street, Leadenhall Market and Moorgate/Liverpool Street. Cheapside PSC is considered to be the City's 'high street' and has seen the most significant retail development in recent years. Moorgate/Liverpool Street PSC has potential to accommodate significant further retail floorspace, capitalising on the opening of the Elizabeth Line and becoming a key retail destination.

5.2.5 ~~The floorspace target is based on a~~ **A** Retail Needs Assessment undertaken in 2017 which identified a need for 196,000 m² of additional retail floorspace up to 2036. This is an aspirational target based principally on projected employment growth in the City. The reduction in footfall and the increase in online retailing as a result of the Covid-19 pandemic has reduced retail activity in the City, at least in the short term. The introduction of a Commercial, Business and Service use class, Class E, which replaces previous A1, A2 and A3 uses, reduces the City Corporation's ability to manage the mix of retail uses. These changes are likely to impact on the projected level of retail growth. Nevertheless, the fundamental economic indicators underpinning the Local Plan remain and the patterns of growth identified in the Retail Needs Assessment remain valid. The Assessment identifies the potential for significant retail growth in and around the PSCs, with a focus on potential growth around Moorgate/Liverpool Street. Some growth is anticipated to come forward outside the PSCs, near them or along the Retail Links.

...

5.2.7 There are further opportunities to develop the City's retail offer, allowing for a broad mix of retail facilities while maintaining a predominance of **A1 comparison and**

	<p><u>convenience</u> retail uses. The role and status of the four PSCs will be strengthened, encouraging further retail A1 development, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to pedestrian links and the retail offer within the Retail Links will encourage shoppers to move between the PSCs by making these connecting routes more interesting and convenient to explore <u>enabling increased activity along these connecting routes, and creating a welcoming and vibrant environment.</u></p> <p>5.2.8. Major retail development, defined as development over 2,500m² gross floorspace, should locate within PSCs, but where suitable sites are not available sites on the edge of the PSCs or on identified Retail Links should be considered before other areas of the City. Smaller scale retail development will be encouraged throughout the City, where it provides an active frontage and facilities which meet the needs of the City's working population or local residents. Particular encouragement will be given to A1 convenience retail uses near to residential areas that serve the needs of residents.</p>	
<p>Policy RE1 - Principal Shopping Centres: Paragraphs 5.2.11 - 5.2.16</p>	<p>Policy RE1: Principal Shopping Centres</p> <p>1. Principal Shopping Centres (PSCs) are designated frontages on the Policies Map. Sites or buildings that form part of a designated frontage are considered to be part of the PSC in their entirety.</p> <p>2. The role of the PSCs as concentrations of A1-comparison and convenience shopping will be retained. The loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision, predominantly A1 shops, of varied unit sizes and frontage lengths will be encouraged, <u>supported by complementary uses that increase footfall and provide active frontages. Where planning permission is required, Pp</u> proposals for changes between retail uses within the PSCs will be assessed against:</p> <ul style="list-style-type: none"> • the contribution the unit makes to the function and character of the PSC; and 	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

- the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

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

...

5.2.11. ~~Retailing comprises shops (A1), financial and professional services such as banks (A2), restaurants and cafes (A3), drinking establishments (A4) and hot food takeaways (A5).~~ Retail uses within the PSCs are predominantly A1 comparison and convenience uses and the City Corporation considers that this predominance should continue, supported by other town centre uses that provide activity at street level and create a welcoming and attractive environment for people to shop, access services and spend leisure time.

5.2.12. Following changes to the Use Classes Order introduced in September 2020, existing shops, premises providing financial and professional services to the public, and restaurants and cafes could be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this. ~~When considering proposals~~ Where planning permission is required for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, A1 units that are large or in prominent locations should be retained in A1 use. The net loss of ground floor ~~A1 uses within the PSCs will be resisted. The net loss of other~~ retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will ~~also~~ be resisted. ~~Exceptionally, permission may be granted for non-retail, appropriate town centre uses such as leisure in the PSCs, providing these are complementary to the core retail offer and incorporate active~~

~~frontages with an element of retail sales space. A1 units at upper floors and basement levels may contribute to the retail provision of PSCs. However, it is recognised that pressure on ground floor shop units may be reduced by locating other retail and town centre uses at non-ground level. Change of use from shops to other retail or town centre uses at upper floors or basements will be assessed in relation to the contribution the unit makes to the character of the PSC and the effect of the proposed entrance and use on the ground floor frontage.~~

5.2.13. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, whilst retaining a predominance of **A1 comparison and convenience shopping** uses. **In order to retain a critical mass of retail provision within the PSCs, conditions may be attached to permissions for new retail development to ensure that the impacts of any proposed later conversion of such space to non-retail uses can be considered through the planning application process.** Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.

...

5.2.15 Cheapside is currently the largest PSC in the City and serves a wider catchment area than the other centres. The PSC includes Bow Lane, the ground floor of One New Change, Cheapside and Poultry. The PSC has undergone significant redevelopment since 2011 and the strategy is to reinforce its role and character as the City's 'High Street', maintaining a clear predominance of **A1 retail** units with a focus on comparison goods and food and drinks provision....

5.2.16 Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers and residents with a limited number of premises open in the evenings or at weekends. The PSC has a linear form and the busy road creates a poor environment and acts as a barrier to pedestrian permeability. Improvements to the public realm would help

	to improve the environment and the visitor and shopper experience. The current retail stock is largely A1 food retail, and there is an opportunity to capitalise on the comparatively lower rents...	
Policy RE2 - Retail Links: Paragraph 5.2.22	<p>Policy RE2: Retail Links</p> <p>Within the Retail Links, the net loss of <u>active retail</u> frontages and floorspace will be resisted, including the loss of retail facilities, and additional retail development will be supported. A mix of shops and other retail and town centre uses will be encouraged in the Retail Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.</p> <p>...</p> <p>5.2.22. While the mix of uses in the Links should include <u>comparison and convenience-A1</u> shops, a variety of other retail and town centre uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through litter, noise, disturbance and odours. All development proposals for change of use in the Retail Links will be required to incorporate active frontages at street level.</p>	To reflect changes to the Use Classes Order introduced in September 2020
Policy RE3 - Ground floor retail provision elsewhere in the City: Paragraphs 5.2.23 – 5.2.24	<p>Policy RE3: Ground floor retail provision elsewhere in the City</p> <p>1. Retail uses will be encouraged at ground floor level across the City provided they:</p> <ul style="list-style-type: none"> • include active frontages onto the street; • do not impact adversely on the amenity of residents, workers and visitors; • do not impact adversely on the operation of office premises; and • would not adversely affect the vitality and viability of the PSCs or Retail Links. <p>2. The loss of A1 convenience retail units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.</p>	To reflect changes to the Use Classes Order introduced in September 2020

	<p><u>Reason for the policy</u></p> <p>5.2.23. Retail units outside of PSCs and Retail Links provide local facilities for the City’s workforce, enhance the City’s vibrancy, and may serve the City’s residential communities. Given that most of the City’s retail provision is tailored towards City workers, it is important to retain A1 units such as convenience stores that are within easy walking distance of the residential areas <u>and meet the day to day needs of surrounding communities. Unless they are subject to specific planning conditions, such units could be converted to any Class E commercial, business and service use without planning permission.</u></p> <p><u>How the policy works</u></p> <p>5.2.24. The provision of new retail units, particularly A1 comparison and convenience units, at ground floor level in existing and new development will be encouraged where these units do not have an adverse impact on the operation of office premises, provide an active frontage onto the street and do not have an adverse impact on the amenity of residents, workers or visitors by reason of noise, smells or fumes from the operation of the unit or servicing and deliveries. Use of ground floors for retail provides the opportunity to create more permeable buildings which can assist in reducing pressure for space on City streets.</p>	
<p>Policy RE4 - Specialist retail uses: Paragraph 5.2.26</p>	<p>5.2.26. The City Corporation will resist proposals which result in the permanent loss of <u>work with owners, developers and occupiers to retain</u> specialist retail uses and premises, unless where it can be demonstrated that such uses are of <u>are no longer required or can be re-provided on a suitable, alternative site which retains any</u> historical or cultural significance. <u>The City Corporation may attach conditions to planning permissions to ensure the retention or</u> the replacement of specialist facilities on the same site will be required where they are impacted by development proposals.</p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

<p>Policy RE5 – Markets: Paragraph 5.2.27</p>	<p>Policy RE5: Markets</p> <p>Proposals for markets and temporary retail pop-ups will be permitted <u>encouraged</u> where they:</p> <ul style="list-style-type: none"> • are of an appropriate scale and frequency for their location; • would not have a significant adverse impact on the vitality and viability of existing retail centres within or outside the City; • would not have a significant adverse impact on the amenity of nearby residents or business occupiers; • would not unduly obstruct pedestrian and vehicular movement; and • would not involve the permanent loss of open space or harm the character of that space. <p>5.2.27 There is an increasing demand for temporary retail pop-ups and street food markets, such as the Guildhall Yard Lunch Market, which can support the local economy by generating increased vibrancy, retail diversity and footfall. These uses provide greater retail choice, enliven the public realm and increase the attractiveness of the City as a place to live, work and visit. <u>Pop-up and meanwhile uses can minimise vacancies of retail premises while a long-term occupier is sought, and may be used to animate areas where construction works are taking place.</u></p> <p>...</p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Policy CV1 - Protection of existing visitor, arts and cultural facilities: New paragraph after paragraph 5.3.10</p>	<p>5.3.10 There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City’s unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches and specialist retail premises such as the Silver Vaults in Chancery Lane.</p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

	<p><u>5.3.xx. Some cultural facilities fall within broad categories of land use under the Use Classes Order, enabling the change of use of any one land use to another within that class without requiring planning permission. For instance, museums, places of worship and exhibition halls all fall within Use Class F.1 (Learning and non-residential institutions). However, other uses such as theatres, concert halls and public houses are classed as sui generis, meaning that planning permission would be required to change them to any alternative use.</u></p>	
Policy CV3 – Hotels: Paragraph 5.3.15	<p>5.3.15 While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in 2019 had 38 hotels, apart-hotels and hostels, providing 6,100 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. This demand is driven by a projected increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City’s projected share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement. <u>It should be noted that these GLA forecasts predate the Covid-19 pandemic but although there have been short term impacts on the tourism industry, the attractions of the City and of London as a visitor destination remain strong.</u></p>	To reflect impacts arising from the Covid-19 pandemic
Policy CV4 - Evening and night-time economy: Paragraphs 5.3.11 – 5.3.12 and 5.3.15	<p>5.3.11 Night-time entertainment uses in the City include restaurants and cafes (A3), drinking establishments (A4), hot food takeaways (A5) and other related uses including, for example, a nightclub or a mix of such uses. They form part of the City’s wider night-time economy.</p> <p>5.3.12 The management of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and</p>	To reflect changes to the Use Classes Order introduced in September 2020

	<p>other public nuisance. <u>Changes to the Use Classes Order in 2020 allow flexibility for commercial premises including offices and shops to become restaurants and cafes without requiring planning permission. Licensing and environmental health legislation would need to be applied to address any potential nuisance to nearby occupiers in these circumstances, albeit that planning permission would be required for any physical works such as ventilation equipment associated with a restaurant or café use.</u></p> <p>...</p> <p>5.3.15 All planning applications for <u>restaurants and cafes, where planning permission is required, and for drinking establishments, hot food takeaways A3, A4, A5</u> and related, uses should include information stating the proposed hours of operation. The City Corporation may impose conditions requiring the closure of the premises between the hours of 11pm and 7am where appropriate. such as near noise sensitive uses.</p>	
Design – context: Paragraph 6.1.3	6.1.3. 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 by <u>2050 2040</u> in accordance with the London Plan <u>City Corporation’s Climate Action Strategy</u> .	Factual update
Strategic Policy S8 – Design: Paragraph 6.1.8	6.1.8. The City has a large workforce whose numbers are expected to grow substantially, <u>albeit that increased remote working means that actual footfall may not rise in proportion to total employment.</u> 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. The Transport Strategy sets standards and targets for pedestrian accessibility which will be implemented, in part, through this Plan.	To reflect impacts arising from the Covid-19 pandemic

<p>Policy DE1 - Sustainability Standards: Paragraphs 6.1.11 and 6.1.14</p>	<p>6.1.11. 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:</p> <ul style="list-style-type: none"> • Energy, carbon emissions and air pollutants – reducing emissions and moving to a zero emission and zero carbon city by 2050-2040, in line with <u>London Plan the requirements of the City Corporation's Climate Action Strategy;</u> • Water – reducing water use in an area of serious water stress; • Pollution – reducing exposure to poor air quality; • Materials – retaining embodied carbon in existing buildings and materials and improving resource efficiency. <p>...</p> <p>6.1.14. The City Corporation is developing has adopted a Climate Action Strategy which will sets out a trajectory towards zero carbon in the City of London by 2040, and actions required to ensure that the City is resilient to the impacts of climate change. The application of sustainability standards through this Plan will contribute to the achievement of these objectives.</p>	<p>Factual updates</p>
<p>Vehicular Transport and Servicing – context: Paragraph 6.2.4</p>	<p>6.2.4 The demands on the City's transport network are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation published a long-term Transport Strategy in 2019 which sets the key priorities for the City's streets and how the network is used. The Transport Strategy was developed in parallel with the drafting of the Local Plan and the policies set out in both are aligned. <u>Measures to support the City's Covid-19 recovery may provide an opportunity to accelerate delivery of some elements of the Transport Strategy.</u></p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>

<p>Active Travel and Healthy Streets – context: Paragraph 6.3.2</p>	<p>6.3.2 The City’s workforce is expected to increase significantly over the course of the Plan period to 2036, <u>albeit that increased remote working means that actual footfall is unlikely to rise in proportion to total employment. while visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early evening. Figure 15 illustrates forecast pedestrian flows across the City in 2026 during the am peak. This forecast was produced before the Covid-19 pandemic and it is uncertain to what extent the pandemic may affect medium and longer term pedestrian movement in the City. The pandemic has, however, emphasised the importance of facilitating active travel and healthy streets to ensure the City remains safe, attractive and comfortable for workers, residents and visitors.</u></p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Strategic Policy S14 - Open Spaces and Green Infrastructure: Paragraph 6.6.3</p>	<p>6.6.3. Open and green space is under increasing pressure due to the intensification of development, an expanding workforce and growing visitor numbers projected over the Plan period. <u>It is important that access to these spaces is protected and expanded as they provide multiple positive impacts on physical health and mental wellbeing, including providing opportunities for exercise, to reduce stress levels, and to facilitate social interaction.</u></p>	<p>To reflect impacts arising from the Covid-19 pandemic</p>
<p>Policy OS2 - City Greening: Paragraph 6.6.13</p>	<p>Policy OS2: City Greening</p> <p>1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.</p> <ul style="list-style-type: none"> • All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context; • The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought, <u>where appropriate</u>, and new development should not compromise these elements on existing buildings located nearby; and 	<p>To reflect advice from the District Surveyor</p>

	<ul style="list-style-type: none"> The loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances. <p>...</p> <p>6.6.13. The City of London Corporation has long championed green roofs and continues to actively encourage them, but other forms of greening are less common in and around new buildings. The City Corporation will seek the provision of trees and landscaping <u>in all development where this is possible, and v</u>vertical greening such as green walls <u>will be sought on buildings which do not provide for overnight sleeping accommodation</u>. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they require careful design, installation and regular maintenance.</p>	
<p>Policy OS3 – Biodiversity: Paragraph 6.6.24</p>	<p>6.6.24. The City has 13 Sites of Importance for Nature Conservation (SINCs), including three new SINCs (Postman’s Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were <u>designated-agreed</u> following a review in 2016. Two existing SINCs were <u>agreed to be</u> upgraded <u>to Sites of Borough Importance for Nature Conservation (SBINC)</u> as part of this review: Barbican and St Alphage Garden, which includes the Barbican Wildlife Garden and the Beech Gardens, <u>was upgraded from Grade 2 to Grade 1 Site of Borough Importance for Nature Conservation (SBINC)</u>; and Roman Wall, Noble Street, which was extended <u>southwards</u> to include St Anne and St Agnes Churchyard <u>and was upgraded from a Local SINC to a Grade 2 SBINC. These new and upgraded SINCs will formally take effect upon adoption of this Plan.</u></p>	<p>Factual clarification</p>
<p>Strategic Policy S15 - Climate Resilience and Flood Risk: Paragraphs 6.7.2 – 6.7.3 and 6.7.6</p>	<p>6.7.2. The UK Climate Projections (CP18) predict that London will experience a rise in mean temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density</p>	<p>Factual updates</p>

	<p>urban environments like the City and this will be kept under review. The City Corporation is developing has adopted a Climate Action Strategy setting out how the City can transition to a zero carbon economy by 2040 and be resilient to the impacts of climate change.</p> <p>6.7.3. Today’s new buildings will probably be in place for decades or longer and must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will help keep the City safe and comfortable as climate patterns change. Policy DE1 (Sustainability Standards) sets out sustainability standards for new development in the City and the City Corporation’s ambition to move to a zero emission City by 2040.</p> <p>...</p> <p>6.7.6. The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making through implementation of, and annual monitoring and review of, the City Corporation’s Climate Action Strategy. UK Climate Projections and the detailed actions in the Climate Action Strategy will form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.</p>	
<p>Policy CR2 - Flood Risk: Paragraph 6.7.15</p>	<p>6.7.15. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 4 shows the vulnerability classifications and Table 5 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. The Environment Agency’s flood zones are shown on the policies map. The Sequential Test must be applied for all development other than minor development or change of use in the City Flood Risk Area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water / sewer flooding. Where a change of use results in a more vulnerable use evidence must be presented to demonstrate safety and suitable access and egress routes. <u>Where necessary, conditions will be attached to planning permissions to manage the change of use into more vulnerable categories.</u></p>	<p>To reflect changes to the Use Classes Order introduced in September 2020</p>

Strategic Policy S17 - Thames Policy Area: Paragraph 7.2.5	<p>7.2.5 There are a range of different strategies and plans which affect the Thames including:</p> <ul style="list-style-type: none"> • The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area. • The Mayor of London’s Safeguarded Wharves Review 2018-2019, which started in 2018 and aims to ensure that London’s need for waterborne freight-handling uses is met. • The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues. • The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements. • <u>Guidance called A Safer Riverside produced by the Port of London Authority, which aims to reduce the number of people drowning in the Thames by ensuring that safety is an intrinsic part of all development alongside and on the tidal Thames.</u> <p>...</p>	Factual updates
Strategic Policy S20 - Aldgate, Tower and Portsoken	<p>Strategic Policy S20: Aldgate, Tower and Portsoken</p> <p>The Aldgate, Tower and Portsoken Key Area of Change will be promoted as a mixed-use area, which balances the competing needs of residents, workers and visitors, by:</p> <ol style="list-style-type: none"> 1. Promoting office-led commercial development to assist in the further renewal of the area. Diplomatic use and associated commercial activity will be encouraged. 	To reflect advice from Planning Inspector during an advisory visit, in which he commented that this policy needs to refer to residential development to be

	<p>2. Supporting and enabling residential development in appropriate locations and identifying and meeting residents’ needs, utilising a range of funding sources to: </p>	consistent with the distribution of development set out in the Spatial Strategy
Strategic Policy S21 - City Cluster: Paragraph 7.6.2	<p>7.6.1. ...Recognisable and iconic tall buildings, including the Gherkin and the Leadenhall Building, have been constructed over the past 15 years and a number of significant tall buildings are under construction. Further tall buildings have been permitted but not yet commenced. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.</p> <p>7.6.2 <u>While increased remote working means that actual footfall may not rise in proportion to projected employment growth, the planned intensification of development in a relatively small geographic area is expected to will</u> lead to a significant increase in footfall on streets that are already crowded at peak times. The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line will bring increased pedestrian movement into the Cluster, with Bishopsgate a key pedestrian route into and through the area. This concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation. To assist delivery of transformational projects in the Cluster, the City Corporation will support the work of the Eastern City Cluster Partnership in the process to become a Business Improvement District.</p>	To reflect impacts arising from the Covid-19 pandemic
Strategic Policy S22 - Fleet Street and Ludgate: Paragraph 7.7.11	<p>Strategic Policy S22: Fleet Street and Ludgate</p> <p>The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by:</p> <p>...</p>	To reflect changes to the Use Classes Order introduced in September 2020

	<p>6. Retaining retail provision within the Fleet Street PSC Principal Shopping Centre and Retail Link and encouraging extension of retail, leisure and cultural activity into the evening and weekends, whilst retaining a focus on <u>comparison and convenience shopping in the PSC.A1 uses</u>.</p> <p>...</p> <p>7.7.11. The PSC is an important aspect of Fleet Street that provides vibrancy along its length. To strengthen the PSC, it should continue to focus on <u>comparison and convenience shopping</u>A1 uses, but also look to extend its retail offer into the evenings and weekends. The Retail Link on Ludgate Hill provides a key route between the Fleet Street and Cheapside PSCs and further retail development for <u>retail and town centre uses</u> is appropriate along this route.</p>	
Strategic Policy S23 - Smithfield and Barbican	<p>Strategic Policy S23: Smithfield and Barbican</p> <p>The City Corporation will improve the Smithfield and Barbican area by:</p> <ul style="list-style-type: none"> • implementing the Culture Mile initiative, including delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy. • ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses; • ensuring future alternative uses that are appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated; 	To reflect advice from Planning Inspector during an advisory visit, in which he commented that this policy needs to refer to residential development to be consistent with the distribution of development set out in the Spatial Strategy

	<ul style="list-style-type: none"> • <u>supporting and enabling residential development in appropriate locations;</u> • identifying and meeting residents’ needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space; <p>...</p>	
Implementation – monitoring: New paragraph after paragraph 8.2.3	<p>8.2.3. The City Corporation is required to review the Local Plan at least every five years from the date of adoption to determine whether it needs to be updated. Data and trends identified in the Local Plan monitoring reports may indicate the need for an earlier partial or full review of the adopted Plan. The emergence of new trends resulting from the coronavirus Covid-19 pandemic and its aftermath will be regularly monitored for their policy implications.</p> <p><u>8.2.4. As mentioned in the introduction to this Plan, the Government is pursuing a planning reform agenda which includes proposals to radically change the format and content of local plans. These reforms, if enacted, will be a key factor in determining the timing and scope of the next review of the City of London’s Local Plan.</u></p>	To reflect impacts arising from the Covid-19 pandemic / Factual update
Glossary	<p>SINCs - Sites of Importance for Nature Conservation</p> <p>The Greater London Authority* designated SINCs to highlight areas of ecological value in the City. London's most valuable places for wildlife that provide local people with access to nature have been identified as Sites of Importance for Nature Conservation (SINCs). The sites are graded as being of Metropolitan, Borough or Local importance.</p>	Factual clarification
Glossary	<p>Social and community facilities</p> <p>Social and community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments, <u>including the Town and Country Planning (Amendment) (England) Regulations 2020. Order 1987 and its subsequent</u></p>	To reflect changes to the Use Classes Order introduced in September 2020

	<p>amendments. The majority of social and community facilities fall within <u>Class E (Commercial, business and services), Class F.1 (Learning and non-residential institutions) and Class F.2 (Local community uses) C2 (Residential Institutions), D1 (Non-residential Institutions) and D2 (Assembly and Leisure)</u> use classes. Community facilities include:</p> <ol style="list-style-type: none">1. Leisure and cultural facilities (including arts, entertainment and sport facilities)2. Community centres and meeting places (including places of worship)3. Libraries4. Facilities for children (from nursery provision to youth clubs)5. Education (including adult education)6. Healthcare facilities	
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