

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 17/05/2019
Subject: City of London Local Plan Review: report on public consultation, key issues raised and proposed next steps	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
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Summary

The draft City Plan 2036 was issued for public consultation during November 2018 to the end of February 2019. An extensive consultation exercise was undertaken, comprising mailouts, public meetings, drop-in sessions, meetings with various organisations and groups and use of social media. Copies of the draft Plan and consultation material were made widely available and an interactive summary placed on the Corporation's website. 181 responses, making 825 individual comments, were received, alongside notes from meetings.

The next stage in the preparation of the draft Plan is to agree revisions to the draft Plan which will then be published for a final stage of consultation likely to be in early 2020.

This report outlines the key issues that arose from the consultation for Members' discussion. A series of further meetings of the Sub-Committee will be programmed to consider the proposed changes and full text of the Plan.

Recommendation(s)

Members are recommended to:

- Note the results of the consultation on the draft Plan.
- Give their views on the key issues raised in the consultation outlined in this report and Appendix 1.
- Advise on how the Sub-Committee would like to undertake its further work in agreeing revisions to the Plan.

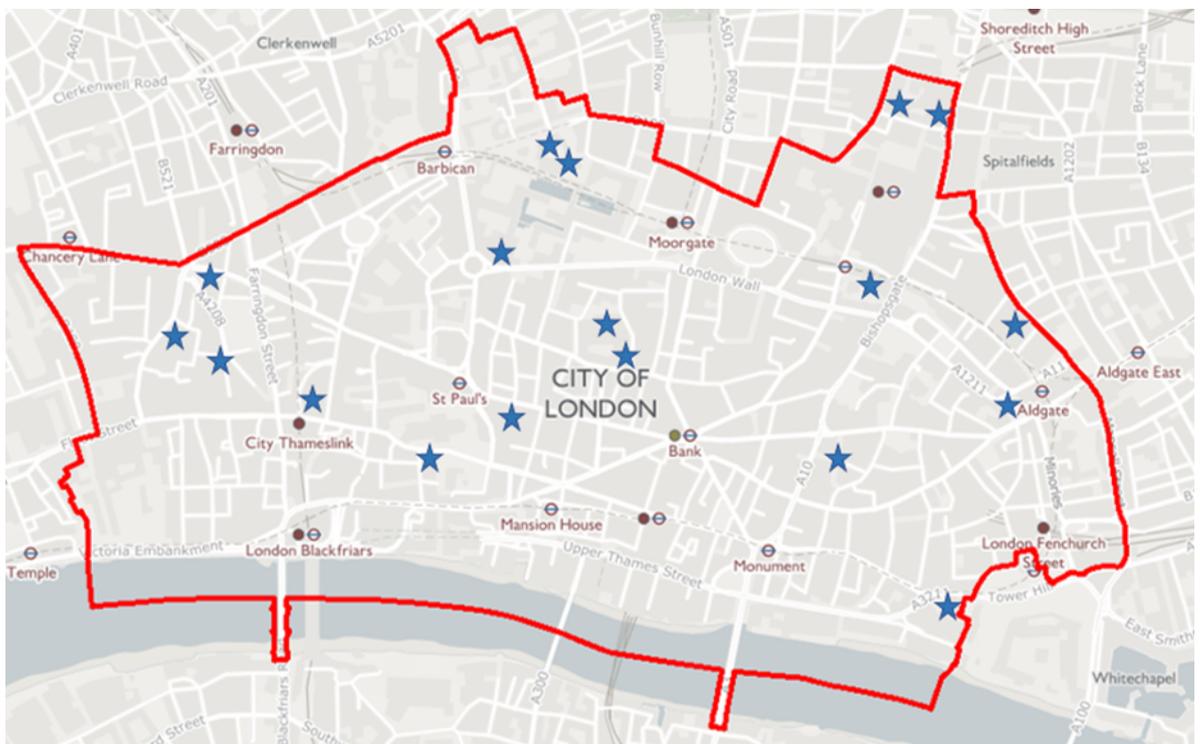
Main Report

Background

1. At its meeting on 30 October 2018, the Planning & Transportation Committee approved the draft Local Plan for public consultation. This followed careful consideration of the planning issues facing the City and scrutiny of proposed policies through the Local Plan Sub-Committee during 2017 and 2018.

2. The draft Local Plan was published for consultation alongside the draft Transport Strategy on 12th November 2019, with the consultation period closing on 28th February 2019. An extensive and wide-ranging programme of engagement was undertaken, including:

- Email notification to 318 recipients on the Local Plan consultation database (the size of the database reduced considerably on the introduction of GDPR but is slowly increasing again. It now stands at 485);
- Letter to all City residential addresses;
- Email to approximately 4,600 businesses on the City Occupiers Database;
- Two stakeholder consultation events on 18/01/2019, attended by 62 people;
- A public consultation event on 28/01/2019, attended by 39 people;
- 21 drop-in sessions at venues across the City throughout the consultation period. Venues were chosen to engage with different communities, both geographically and in terms of the likely audience. Locations are shown on the map below:



Location of City Plan 2036 drop-in sessions

- Presentations to City organisations at 9 separate events, including the City Property Association, the Clean City Awards Scheme Forum, Bishopsgate Ward and Culture Mile Network;
- Attendance at Transport Strategy consultation events;
- Commissioning a targeted consultation event on 20/02/2019 attended by 38 young people between the ages of 17 and 25;
- Notifying City Corporation Members through the November 2018 Members' Briefing and City Corporation officers and Members through information on the City Corporation's intranet pages.

3. The draft Local Plan, summary leaflet, evidence base, Integrated Impact Assessment and an online comment form were posted on the City Corporation's website. An interactive summary of the Plan, a Story Map, was also made available on the website, which attracted significant interest and compliment.
4. The Local Plan, summary leaflet, postcards and posters were made available in City libraries and at the Built Environment Enquiries Desk throughout the consultation. The summary leaflet and postcards were available at public meetings, drop-in sessions and other meetings.
5. Throughout the consultation, officers worked closely with the City Corporation's Communications Team to ensure extensive media coverage, through press releases, interviews with the Chairman of the Planning & Transportation Committee, and the use of social media, particularly through postings on Twitter and Facebook.

Draft Plan Public Consultation Response

6. A total of 181 responses were received to the consultation, making a total of 825 individual comments. In addition, a range of comments made through public and stakeholder meetings and through a youth engagement workshop which are not recorded or attributed as individual comments but will be considered in making amendments to the Plan. Although the numbers were less than hoped, particularly given the extensive nature of the consultation and mailouts, the number of responses was more than twice that received at the same stage of preparation of the adopted Local Plan (80 responses). Regular liaison with colleagues in neighbouring boroughs shows a general difficulty in engaging the public on planning policy matters, principally due to the length and complexity of statutory planning documents.
7. A wide range of organisations commented on the draft Plan, including City landowners, developers and their agents, business occupiers, residents and amenity groups and organisations. Responses were also received from statutory agencies and bodies, including neighbouring boroughs and the Mayor of London/Transport for London.

Key Issues

8. Comments were received on all aspects of the draft Plan and there was no single, dominant theme. Numerically, most comments addressed:
 - Transport (vehicular transport, walking and cycling)
 - Design
 - Open spaces and green infrastructure
 - Healthy and inclusive City
 - Culture, Visitors and the Night-time Economy
9. Whilst comments were received on all seven Key Areas of Change, the majority related to the Smithfield and Barbican area and to the City Cluster.

10. The main points raised in these comments are set out below, with further detail in Appendix 1:

- Vision and Objectives: widespread support for the Plan's vision and objectives.
- Healthy and Inclusive City: there was support for the overarching themes and ambition to deliver healthier and more inclusive City. The inclusion of policies at the front of the Plan and priority given to this agenda was supported. There was particularly strong support for measures to address poor air quality and a number of suggestions for initiatives to deliver improvements.
- Urban greening: widespread support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity. There was some concern from developers about the feasibility and viability of providing more greening on buildings, as opposed to around buildings.
- Transport: a range of transport issues were raised, with themes very similar to those raised in the Transport Strategy consultation. Particular issues included freight deliveries, pedestrian permeability, provision for cyclists and whether the Plan's transport proposals were ambitious enough and/or deliverable.
- Tall buildings, protected views and heritage assets: concerns were raised about the impact of tall building development on the setting of the Tower of London and St Paul's Cathedral, including from the processional route along Fleet Street and Ludgate Hill. Questions were raised as to whether the policies are clear enough and consistent with policies in neighbouring boroughs. Questions were also raised about the quality of design.
- City Cluster: questions around how the City Corporation will manage further intensification of this area, particularly the impact on City streets of increased traffic and footfall, whether or not the area should be expanded to allow further tall buildings and whether the boundary of the Cluster should be clearly delineated in the Plan rather than having an indicative boundary.
- Culture Mile (Smithfield and Barbican Area): general support for the Culture Mile initiative and the wider policies proposed for the Smithfield and Barbican Area but concerns about the impact of proposed developments and activities on residential amenity. A number of comments received concerning the future of Smithfield Market, with an expectation that the Plan should provide clear guidance on potential future uses.

11. Other parts of the draft Plan received a lesser number of comments, reflecting a degree of support for the approach taken, but also raising questions that will need to be addressed in proposed changes. Amongst the other issues raised are:

- Whether the retail policies were flexible enough to respond to changing retail patterns and a desire for more independent shops.

- Support for requiring flexible office floorplates and the growth in office floorspace, but some comments suggesting a need for affordable workspace policies.
- Some concern from developers about the cumulative impact of the Local Plan policies on the viability and deliverability of development.
- Some concern about the evidence base to support policy, particularly in relation to tall buildings and the identification of the Key Areas of Change.
- A concern from some residents that the Plan retains a business focus to the detriment of residents.

Comments from the Mayor of London

12. To progress the Local Plan through public examination to adoption, the City Corporation will need to seek a formal Statement of Conformity with the London Plan from the Mayor of London. The Mayor's comments on the draft Plan are therefore particularly important. The Mayor welcomed a number of areas of the Plan, including the clear overarching strategic objectives and the role of the City in the Central Activities Zone. The Mayor considered that the Local Plan needed to take a more proactive approach in several strategic areas, including housing and office development, demonstrating that identified needs can be met over the plan period and providing more certainty and clarity for developers. In relation to the Key Areas of Change, the Mayor considered that work should be undertaken to identify potential development sites to establish whether the City Corporation can meet its housing target, whilst also delivering office growth. The Mayor welcomed the draft Plan's general approach to transport but considered that there should be more focus on the Healthy Streets approach with greater prioritisation of walking and cycling over motorised transport.

Preparation of Publication Draft Plan

13. Further meetings of the Sub-Committee will be required to consider proposed changes to the policies and text of the draft Local Plan. The Sub-Committee will be asked to consider proposed changes and recommend that the revised Plan be approved by the Grand Committee, Policy & Resources Committee and Court of Common Council for further public consultation and submission to the Secretary of State for examination.

14. The number and frequency of meetings will be informed by how the Sub-Committee wishes to proceed in terms of considering changes to the draft Plan. In developing the draft Plan, the Sub-Committee met on a number of occasions to consider a series of draft policies before a final meeting to approve the full draft Plan for consideration by the Grand Committee. If Members are happy to follow a similar approach, then officers suggest that a further 3 meetings are likely to be needed:

- July – to consider an outline of the main proposed changes, including any changes to the overall strategy, and receive an update on the supporting evidence base which underpins the Plan;
- September – to consider a full schedule of additional changes to the Local Plan in response to the consultation;

- October – to consider the full revised plan for approval and recommendation to the Grand Committee.

15. The Sub-Committee is asked to advise how it wishes to proceed.

Next steps

16. Following consideration by the Sub-Committee, the revised draft Plan will need to be approved by the Grand Committee, Policy & Resources Committee and Court of Common Council for further statutory consultation and subsequent submission to the Secretary of State for public examination. The target dates for Committee approval are:

- Planning & Transportation Committee on 5/11/2019
- Policy & Resources Committee on 21/11/2019
- Court of Common Council on 5/12/2019

17. The next stage of consultation will take place in early 2020 and is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. There is very little opportunity for the City Corporation to make further changes to the Plan in response to such objections. Instead, the Plan and any comments received are examined by an independent inspector appointed by the Secretary of State. The inspector will subsequently issue a report on the examination, which may include recommended modifications to the Plan. Subject to the availability of an inspector, the examination hearing is likely to be held in early summer 2020, with adoption of the Plan later in 2020 or early 2021.

Corporate & Strategic Implications

18. 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 draft Plan provides a spatial planning framework to support the four key corporate capital projects, along with proposals to ensure a sufficient future supply of business space by extending the City's tall building cluster. The draft Plan aligns with the draft Transport Strategy.

Conclusion

19. The City of London Draft Local Plan was subject to public consultation between November 2018 and February 2019. 181 responses to the consultation were received, making 825 individual comments. Key issues that were raised in the responses included support for the overarching strategy and objectives, support for further urban greening, issues around transport, the impact of tall building development on the setting of the Tower of London and St Paul's Cathedral, questions about the management of further development and extension of the City Cluster and general support for Culture Mile initiatives, although some concern about impacts on amenity.

20. Further meetings of the Sub-Committee will be required to consider changes to the draft Plan before it is recommended to the Grand Committee, Policy & Resources Committee and Court of Common Council for approval. The draft Plan

will then be subject to further statutory consultation before the draft Plan and any comments are submitted to the Secretary of State for public examination.

Appendices

- Appendix 1 – Key Issues raised through public consultation

Background Papers

Report to Planning & Transportation Committee 30/10/2018: City of London Local Plan Review: Proposed Draft Plan

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