

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 14/01/2020
Subject: City of London Local Plan Review: Proposed Submission version of City Plan 2036	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Adrian Roche, Department of the Built Environment	

Summary

The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. During the summer this Sub-Committee considered the main issues raised during the consultation and gave a steer to officers on the way forward in relation to a number of key strategic topics. Officers have now drafted a revised version of the Plan, known as the Proposed Submission City Plan 2036, which will be subject to a further final round of public consultation during 2020 before being submitted to the Secretary of State for examination.

This report highlights the main changes that are proposed to the earlier November 2018 draft Plan and includes a full schedule of changes covering all the citywide policies. Proposed changes to the area-based policies will be presented to the Sub-Committee in February. Many of the changes have arisen in response to comments received during the public consultation, but some have been included to reflect changes to the emerging London Plan or to national guidance since the draft Plan was published. In addition, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.

Members are asked to agree that the sections of the Proposed Submission City Plan 2036 set out in this report can go forward to the Grand Committee for consideration in March.

Recommendation

Members are recommended to:

- Agree the sections of the Proposed Submission City Plan 2036 set out at Appendix 1 of this report; and
- Authorise the Director of the Built Environment to make further minor editorial changes and non-material additions to the Proposed Submission City Plan 2036 as necessary prior to its consideration by Planning and Transportation Committee.

Main Report

Background

1. The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. Approximately 900 written comments were received from 180 respondents, along with informal comments collected at workshops and meetings. A summary of each of the written comments received is available on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
2. This Sub-Committee met on 17th May 2019 to consider the main themes raised during the consultation and on 19th July 2019 to consider strategic issues and potential Plan changes. The July meeting focused on those issues where consultation responses suggested either a significant change in policy approach or identified a policy conflict. Members considered potential options for each of those issues and provided officers with a steer on the appropriate way forward.
3. During the autumn, officers have drafted changes to the Plan in response to comments received during the public consultation and reflecting the steer provided by this Sub-Committee. In addition, officers have had regard to recent extensive updates to national planning practice guidance and to publication of the Mayor's final proposed changes to the London Plan in December following receipt of the Examination in Public Panel Report in October. None of the changes made to the London Plan by the Mayor have fundamentally altered the strategic context for the City of London and while it is possible that the Secretary of State could make further changes, it is considered that there is now sufficient certainty about the likely content of the new London Plan to be able to progress the City's Local Plan towards submission and examination.

Proposed Submission City Plan 2036

4. Attached at Appendix 1 of this report are Sections 1-6 of the Proposed Submission version of City Plan 2036, covering the introductory text, the vision, objectives and spatial strategy, and the citywide policies grouped by topic. The final sections of the Plan, covering the Key Areas of Change and Implementation, will be presented to the Sub-Committee in February.
5. The document at Appendix 1 identifies the changes to the draft Plan, with deletions shown in crossed out bold text and additions in bold underlined text, to enable Members to easily identify where changes have been made and to focus discussion on those changes. As well as responding to consultation comments, national planning guidance and the emerging London Plan, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.
6. Given the large number of detailed changes outlined in Appendix 1, it is anticipated that it will take more than one meeting for the Sub-Committee to

consider those changes. Further meetings have therefore been arranged on the 3rd February and the 10th February. Officers felt, however, that it would be helpful to present the Sub-Committee with all the citywide policies at the same time so that Members can see how the policies fit together.

7. Copies of updated maps and diagrams in the draft Plan will be tabled at the meeting.

Key Changes

8. The main changes proposed compared to the November 2018 draft Plan are summarised below, in Plan order:
 - The addition of a section addressing what happens if things change within the introduction.
 - The addition of a spatial strategy to link the vision and strategic objectives to the Key Diagram and the detailed policies.
 - Further strengthening of the air quality policy to reflect the City Corporation's new Air Quality Strategy and changes to the London Plan.
 - A new policy on Health Impact Assessments to embed the consideration of health impacts within the planning process.
 - A commitment to deliver 50% affordable housing on public sector land in accordance with the London Plan policy approach.
 - The addition of a requirement for major development to include Cultural Strategies to help enrich and enhance the City's cultural offer.
 - Greater emphasis on the use of 3D modelling technology to assist in the determination of planning applications.
 - Differentiation between the policy approach to designated and non-designated heritage assets.
 - Refinements to the policies on tall buildings and protected views, including recognition that the background to the Tower of London on the eastern fringe of the City is an area inappropriate for tall buildings.
 - A new policy on trees, which was an omission from the draft Plan.
9. Changes to the Safe and Secure City policies are being considered by the Senior Security Board and will be brought to the Sub-Committee when available.
10. Officers consider that the changes set out in Appendix 1 have improved the Plan and are confident that the Proposed Submission version of the Plan will be a robust document that meets the relevant legal and soundness tests. Nonetheless, there are some potential risks and challenges at the examination stage and officers will outline those to Members orally at the meeting.

Minor editorial changes

11. Given the size and scope of the Proposed Submission City Plan 2036, some further editing may be undertaken before it is considered by the Grand

Committee. This includes further proof-reading to correct any typographical errors and reduce duplication, updating of the infographics and refinements to maps and illustrations. Members are asked to authorise the Director of the Built Environment to make these further minor editorial and non-material changes prior to consideration by the Grand Committee.

12. In addition, the Plan will be professionally designed prior to the start of public consultation and will be accompanied by a range of supporting material to explain the policies and proposals in more detail.

Evidence base

13. The Proposed Submission City Plan 2036 has been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. Amongst the evidence published to support the draft Local Plan consultation were studies relating to the office market; retail needs; urban greening; flood risk; housing need; waste arisings and transitioning to zero carbon by 2050.
14. Further evidence is being gathered to support the Proposed Submission Plan including an Infrastructure Delivery Plan, which identifies the infrastructure required to deliver the Local Plan and examines where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Another key piece of evidence is an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile. This viability assessment will include an assessment of the scope for increasing the financial contribution to affordable housing and the future scope for updating the City's Community Infrastructure Levy. These documents will be available for Members to read when the Plan is considered by the Grand Committee.
15. Statements of Common Ground (SoCGs) are being prepared to document how the City Corporation is cooperating with neighbouring boroughs and other key partners under the Duty to Cooperate. At the time of writing, SoCGs have been agreed with Islington, Westminster, Lambeth and Southwark, with others to follow in the early part of 2020.

Integrated Impact Assessment

16. The Proposed Submission City Plan 2036 is being informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.

17. The IIA is produced in-house but is being independently audited by consultants. It will be available for Members to read when the Plan is considered by the Grand Committee.

Next steps

18. Once the Sub-Committee has completed its consideration of the revised Plan, it will be presented to the Grand Committee, Policy and Resources Committee and Court of Common Council for approval. The current target dates for Committee approval are:
- Planning & Transportation Committee on 10/03/2020
 - Policy & Resources Committee on 19/03/2020
 - Court of Common Council on 23/04/2020
19. If the above timescales are met the Proposed Submission City Plan 2036 will be published in May 2020 for a further final six-week public consultation, which is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. The Plan will then be submitted to the Secretary of State for Housing, Communities and Local Government, along with its supporting evidence base and the representations received. The Secretary of State will appoint an Inspector to examine the soundness of the Plan. The Inspector will hold hearings and will subsequently issue a report to the City Corporation, which may include recommended modifications. Assuming the Inspector finds the Plan sound, it is expected to be adopted formally in 2021.

Corporate & Strategic Implications

20. 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 key corporate capital projects, along with proposals to ensure a sufficient supply of business space to meet future needs. The emerging Plan aligns with the adopted Transport Strategy.

Appendices

- Appendix 1 – Track changes version of the Proposed Submission City Plan 2036 (sections 1-6 which excludes the Key Areas of Change and Implementation sections)

Background Papers

None

Adrian Roche

Development Plans Team Leader

T: 020 7332 1846

E: adrian.roche@cityoflondon.gov.uk