

<b>Committee(s)</b> Planning and Transportation	<b>Dated:</b> 27 October 2015
<b>Subject:</b> City of London Local Plan Review	<b>Public</b>
<b>Report of:</b> Director of the Built Environment	<b>For Decision</b>

### Summary

The City of London Local Plan was adopted by the Court of Common Council in January 2015. At the time of adoption, it was recognised that an early review of the Local Plan would be necessary to take account of the Further Alterations to the London Plan and other new policy developments.

This report recommends that a full review of the Local Plan is carried out and seeks approval to commence work on the review. The report also recommends that a Member Working Group be established which could meet in private session, prior to formal consideration by the Local Plans Sub Committee and the Grand Committee.

### Recommendations

Members are recommended to:

- Approve the commencement of work on a full review of the City of London Local Plan to be overseen by the Local Plans Sub Committee reporting to the Grand Committee;
- Agree that an informal Member Working Group derived from the Local Plans Sub Committee be established to consider issues and options informally.

### Main Report

#### Background

1. The current City of London Local Plan was adopted in January 2015, following consideration at Public Examination in late 2014. The Local Plan contains both strategic and development management policies and incorporates the earlier City of London Core Strategy, adopted in 2011.

#### Current Position

2. The adopted Local Plan incorporates both strategic and development management policies across a wide range of topics. The adopted Plan provides a robust and comprehensive policy framework within which to assess planning applications in the City of London, alongside the Mayor's London Plan. However, since adoption there have been a number of national and London-wide policy changes and changes in development trends which suggest the need for an early review.

3. Firstly, it is a statutory requirement that the City's Local Plan should be in general conformity with the London Plan. The adopted Local Plan was prepared with regard to the 2011 version of the London Plan. In March 2015, the Mayor adopted Further Alterations to the London Plan, which included revised targets for housing provision, increasing the City's target from 110 per year to a minimum of 141 per year. The updated London Plan also contains updated employment projections, which consider trends up to 2036. The Local Plan now needs to be updated to address the requirements of the London Plan.
4. Secondly, the Government continues to bring forward a wide range of planning reforms designed to speed up the system to support economic growth, while also seeking to involve local communities more actively in the planning process. The City has an exemption from national permitted development rights for the change of use of offices to residential, which the Government is now proposing to extend for a limited period to May 2019. The Local Plan will need to address any national policy changes and provide a robust framework for considering future office redevelopment proposals. A number of other policies will also require updating to address Government policy changes, including changes to the regime for sustainable drainage systems (SuDS) introduced in April 2015; changes to residential space and accessibility requirements arising from the Government's housing standards review; and greater freedom to change premises between different Class A uses since April 2015, which may affect the implementation of retail frontage policies.
5. Thirdly, the Strategic Objectives of the Local Plan are taken from the 2011 Core Strategy. The Plan needs to be updated to address more recent development trends and reflect some of the City Corporation's emerging priorities and aspirations. A review of the Local Plan would, for instance, provide an opportunity to set out a policy framework to guide the development of the Cultural Hub, and to explore the land-use and transport dimensions of a smarter future City.

## **Options**

6. There are three options available, which are to undertake a full review of the Local Plan; a partial review of selected topics; or not to commence any review at the present time.
7. For the reasons set out above, it is considered that an early review of the Plan is necessary and desirable. In theory a full review would be expected to take longer and cost more than a partial review because of the need for a wider evidence base and the probability that consultation on a full review would generate more comments and objections. On the other hand, a partial review has to go through the same statutory stages as a full review, including different rounds of consultation and examination. Moreover, alterations to one part of a Local Plan may have implications for other parts of the Plan that were not originally proposed to be altered. In practice, a partial review can therefore take a similar length of time to complete as a full review.

8. In order to inform the choice between a full or partial review officers have carried out a policy scoping exercise, the results of which are set out in Appendix 1 to this report. This exercise has shown that the issues where policy changes may be needed are spread across the Plan rather than being confined to specific self-contained sections of the Plan. In the circumstances, it would be difficult to undertake a partial review, given the extent of the likely changes and the knock-on consequences for the integrity of the Plan as a whole.

## **Proposals**

9. Having regard to the outcome of the policy scoping exercise, it is recommended that a full review of the Plan be undertaken. The National Planning Policy Framework (NPPF) states that Local Plans should address a 15-year time horizon to take account of longer-term requirements. The adopted City Local Plan has a time scale that runs to 2026, and it is considered that there would be merit in a full review of the Plan looking forward to 2036. This would enable a period of at least 15 years from adoption and would tie in with the London Plan, which now looks forward to 2036.
10. A review will need to be supported by a range of updated technical evidence to justify the proposed strategy and policies. Much of this evidence will be produced in-house, but some studies will need to be commissioned from external consultants because of their specialist nature. An Integrated Impact Assessment will be undertaken of emerging policies combining a Sustainability Appraisal, an Equality Impact Assessment and a Health Impact Assessment of the new Plan.
11. As well as the requirements to be in general conformity with the London Plan, the Local Plan will need to meet the duty to cooperate. This is a legal duty on local planning authorities and certain other public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of the Plan in relation to strategic cross boundary matters. The City Corporation already engages on a proactive basis with the Mayor of London, TfL, neighbouring boroughs and a range of other partners on strategic planning issues. It will be necessary to ensure that we build on these relationships and take account of the implications of emerging policy outside of the City.
12. It is expected that the Local Plans Sub Committee will be convened to review draft policies formally and advise the Grand Committee. Officers believe that it would also be beneficial to establish a Member Working Group derived from Local Plans Sub Committee members that could meet informally to fully explore the implications of a range of different policy options, including potentially more radical ideas, before formal consideration through public committee.
13. A broad indicative timetable for the proposed review is set out overleaf. This will be worked up in more detail in an updated Local Development Scheme which will be brought to the next meeting of your Committee in November 2015:

<b>Stage of Plan</b>	<b>Dates</b>
Initial preparatory work and Member involvement	Nov 2015-May 2016
Consultation on Issues and Options	June-July 2016
Preparation of full Draft Local Plan	2016-2017
Consultation on Draft Local Plan	Autumn 2017
Consultation on Submission Local Plan	Summer 2018
Submission to Secretary of State	Autumn 2018
Public Examination	Winter 2019
Adoption	Summer 2019

## **Corporate & Strategic Implications**

14. The review of the Local Plan will be prepared with regard to all the City Corporation's other plans and strategies, including the Corporate Plan. The review of the Local Plan provides an opportunity to complement key corporate objectives, such as developing the City's Cultural Hub and progressing the future City agenda.

## **Implications**

15. The costs of producing the Local Plan Review will be met initially from existing staff resources and the existing Local Plan budget allocation carried over from the preparation of the current Local Plan. This will be supplemented where necessary by departmental Local Risk Budgets. Whilst sufficient budget exists to meet the initial phases of the review, further budgetary allocation may be necessary, in particular to meet Public Examination costs. Any requirements for additional budget allocation will be brought back to this Committee for consideration.
16. There is a likelihood that national planning reforms will continue during the period of the Local Plan review and this may impact on both the procedures followed and the content of the Plan. For instance, the Government has recently appointed a panel of experts to look at ways of streamlining the Local Plan process. The panel is due to report back on its findings in the New Year. While the indicative timetable set out above is based on the current legislative and regulatory context, we will need to be mindful of potential further changes to the planning system and be prepared to adapt our timetable and processes accordingly.
17. The election of a new London Mayor next year is likely to be followed by a full review of the London Plan, with the direction of travel in terms of planning policy being determined by the new Mayor's priorities. The potential impacts of any such changes on the City's Local Plan can be mitigated through adopting a flexible approach and by seeking to ensure that the City's specific planning needs are reflected in London-wide planning policies after the election.

## **Conclusion**

18. Members are recommended to approve the commencement of work on a review of the City's Local Plan and to agree that this should be a full review rather than a partial alteration for the reasons set out in the report. Members are also recommended to agree that a Member Working Group be established alongside the Local Plan Sub Committee to be able to consider policy issues and options informally.

## **Appendices**

- Appendix 1 – Local Plan Review policy scoping

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