

**Appendix 1: City of London Corporation's Response to Draft Central Activities Zone Supplementary Planning Guidance, September 2015**

| <b>Draft SPG</b>  | <b>City of London Corporation Response</b>  |
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| <b>General Comment</b>  | <p>The City Corporation welcomes the draft SPG and its overall approach which supports the City as a leading international financial and business services centre.</p> <p>The City of London lies entirely within the CAZ and the London Plan and draft SPG identify the City as a strategically important, globally-orientated financial and business services centre, whose commercial functions should be protected. The draft SPG indicates that residential development is considered inappropriate in the commercial core area of the City of London and that, in other parts of the City, offices and other CAZ strategic functions should be given greater weight relative to new residential. This strong protection for office development in the City is welcomed and reflects the approach taken in the City's Local Plan which seeks to protect existing office uses and maintain the City's strategic office role.</p> <p>The SPG also supports the promotion of Strategic Cultural Areas, such as the Barbican. This support is in line with the City Corporation's aspirations for enhancements to that part of the City as a Cultural Hub.</p> <p>The draft SPG provides further support for other key land uses and activities in the City of London and the approach set out in the City's Local Plan, particularly in relation to the protection and enhancement of heritage assets, the provision of new transport and utilities infrastructure and the need for improvements to the public realm to enhance the CAZ's attractiveness and improve the quality of life for people in the CAZ.</p> |
| <b>Section 1: Promoting the CAZ as a competitive business location</b>  |   |
| <p>Delivering office capacity to support business and employment growth</p> <p>Paragraph 1.1.3</p> <p>Paragraph 1.1.6</p> | <p>The City of London is the world's leading international financial and business services centre, providing nearly 9m square metres of office floorspace and employment for over 400,000 people and generating £45 billion in economic output (GDA), equivalent to 13% of London's output and 3% of the UK's total output. Support for this economic role requires an area specific approach to planning and the City Corporation supports the identification (para 1.1.3) of the need for a tailored or different approach to the application of national policy in the CAZ to address its distinct circumstances and its role as an internationally and nationally significant office location.</p> <p>The Corporation also supports the view (para 1.16) that London Plan policy should be implemented in</p>   |

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|   | ways that promote and incentivise office and other commercial development.   |
| 1.2 Office to residential permitted development rights  | The City Corporation strongly supports statements in the draft SPG calling for the retention of current exemptions from national office to residential permitted development rights to protect the international and national importance of office activity in the City and the CAZ. The City Corporation will continue to work with the Mayor to alert Government to the importance of the retention of the CAZ's international and national roles. This section will, however, need to be amended following the Government's 13 <sup>th</sup> October 2015 announcement that national permitted development rights will be made permanent and the existing exemptions within the CAZ will be extended until May 2019 to allow time for article 4 directions to be put into place.  |
| 1.3 Striking an appropriate balance between strategic functions and residential<br><br>Paragraphs 1.3.1 – 1.3.6 | The City Corporation strongly supports the approach in the draft SPG to ensure that office and other CAZ strategic functions are not compromised by new residential development, and the requirement that greater weight should be given in Local Plans and in determining applications to the promotion and enhancement of the strategic functions of the CAZ. This mirrors the approach in the City of London Local Plan which promotes the strategic importance of office development and resists the loss of land which is both viable and suitable for long term office use.  |
| Paragraph 1.3.7 & Table 1.1   | <p>The City Corporation strongly supports the statement in para 1.3.7 and in Table 1.1, Section A, that residential development is considered inappropriate in the commercial core area of the City of London. The Corporation also supports the priority given in Section B of the table, which requires greater weight be given elsewhere in the City to CAZ strategic functions relative to residential development.</p> <p>The footnote to Table 1.1 indicates that the commercial core area will be defined locally. The City Corporation supports this approach.</p> <p>Whilst greater weight is to be given to office development within the City, the City Corporation is also mindful of the need to ensure sufficient and appropriate provision is made for new housing to address local needs. The City of London Local Plan therefore identifies residential areas where planning policy would allow for a mix of uses, including housing, where this does not constrain the commercial functions of the City.</p> |
| Paragraphs 1.3.10 - 1.3.12 & Figure 1.1   | The City Corporation welcomes the identification of the good practice established in the City's Office Use SPD, particularly in regard to addressing the need to protect land and buildings suitable for long term viable office use.  |

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| <p>1.4 Offices and Mixed Use Development</p> <p>Paragraph 1.4.7</p>   | <p>The City Corporation supports the view that opportunities should be taken to secure active ground floor commercial uses in appropriate parts of the CAZ. This will bring vitality to core office areas and provide necessary ancillary services, without impacting adversely on the function of core office uses.</p>  |
| <p>Delivering mixed uses and housing on-site or nearby and 'exceptions' to mixed use policy</p> <p>Paragraphs 1.4.12, 1.4.18 &amp; 1.4.23</p> | <p>The City Corporation welcomes the clarification (para 1.4.12) that the City of London should be exempt from London Plan requirements to provide on-site housing as part of London Plan Policy 4.3a. This is in line with the approach taken in the City of London Local Plan and the Planning Obligations SPD, where cash in-lieu payments are required on commercial development to fund new affordable housing elsewhere.</p> <p>Similarly, the Corporation supports references to the use of land use swaps, housing credits and off-site contributions towards affordable housing in para 1.4.18 and welcomes the recognition in para 1.4.23 that cash-in-lieu payments are an acceptable way of delivering off-site affordable housing whilst sustaining the City's globally competitive financial and business services.</p> |
| <p>1.6 Supporting specialist clusters</p>   | <p>The City Corporation welcomes the emphasis in this section on the need to provide a supportive policy approach to address the requirements of companies in emerging sectors, including TMT uses, arts, culture, education and law. In recent years, the City of London has witnessed a diversification of uses within the City and continues to support such diversification to ensure that the City remains relevant to emerging business needs.</p>  |
|   |   |
| <p><b>Section 2: Managing the attractions of the CAZ as a global retail, cultural and visitor destination</b></p>                             |   |
| <p>2.2 Promoting culture, arts and entertainment</p> <p>Paragraphs 2.2.1 &amp; 2.2.3</p>  | <p>The City Corporation welcomes confirmation that arts, cultural and entertainment activities are integral to the function and distinctive character of the CAZ. As well as providing a distinct land use, such activities support the international and national role of the CAZ as an office centre and add to the attractiveness of the CAZ as a location for international investment.</p>   |
| <p>Managing the cultural attractions of CAZ as a global visitor destination</p>   | <p>The City Corporation welcomes the emphasis in the draft SPG on the need to identify, promote and protect the special cultural and heritage value of strategic cultural areas. The City of London has a rich heritage, with over 600 listed buildings and 26 conservation areas, which provides a unique environment</p>  |

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| Paragraph 2.2.5                                 | and contributes to the attractiveness of the City as a centre for international investment. The City of London Local Plan emphasises the need for new office and other development to contribute positively towards the conservation and enhancement of these heritage assets.   |
| Paragraph 2.2.8                                 | The City Corporation welcomes the draft SPG's encouragement to designate and promote existing and emerging cultural clusters, the need to address noise and minimise potential impacts on other land uses. The Barbican area is identified as a Strategic Cultural Area within the London Plan and it includes an established residential area. The City Corporation is actively developing proposals for enhancement and potential expansion of the City's Cultural Hub, which would be supported in principle by the draft SPG.  |
| Managing potential pressures on cultural venues | The City Corporation supports the approach to the sensitive management of the impact of evening and cultural uses on other land uses within the draft SPG, including taking into account any cumulative impacts. The City Corporation also supports the approach in para 2.2.11 under which new residential development in the vicinity of an existing cultural venue should include necessary measures to mitigate and minimise any potential noise impacts or neighbour amenity issues. Such measures are also relevant to proposed new cultural venues.   |
| Creative Industries                             | The City Corporation welcomes the support in the draft SPG to sustaining existing and emerging clusters of creative industries, particular through encouraging the provision of a range of flexible and appropriately sized office floorspace. The City Corporation supports measures to encourage creative industries both within the City Fringe and within appropriate areas within the City.   |
| Tourism<br>Paragraphs 2.3.1 – 2.3.5             | <p>The City Corporation notes the importance the draft SPG attaches to ensuring an adequate supply of visitor accommodation within the CAZ, to meet the needs of businesses and tourists.</p> <p>The City Corporation supports the provisions in paragraph 2.3.3 which emphasises the need to avoid over concentration of hotel provision where it might constrain other important and strategic activities, including office provision.</p> <p>Whilst references are made to the importance of high quality conference facilities (para 2.3.5), the City Corporation considers that the draft SPG should give more explicit consideration to addressing the requirements for business tourism within the CAZ.</p> |
| Retail development in the CAZ                   | The City Corporation supports recognition of the key strategic function of retail within the CAZ and as a key element in providing an attractive business location for international companies and their employees. Retail also plays a key role in the provision of more local services to workers, residents and visitors, as  |

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|   | well as providing local employment and vitality at street level to complement office areas of the CAZ.   |
| <b>Section 3 Enhancing the distinct environment and heritage of the CAZ</b>               | The City Corporation welcomes the emphasis in this section on enhancing the environment and heritage of the CAZ. The City of London has a unique heritage which plays a major role in its attractiveness as a major international business centre.   |
| 3.2 The evolution and heritage of Central London<br><br>Figure 3.1 Heritage assets in CAZ | Although this is an illustrative figure, it is difficult to decipher listed buildings and ancient monuments correctly. It would be helpful if the diagram were presented in a clearer fashion.   |
| 3.4 Tall buildings and the CAZ<br><br>Paragraph 3.4.2<br><br>Figure 3.2<br><br>Figure 3.3 | <p>The City Corporation supports the plan-led approach to the location of tall buildings in the CAZ which builds on guidance in the London Plan and reflects the approach taken in the City of London Local Plan, where specific policy guidance is provided for a cluster of tall buildings in the east of the City.</p> <p>The City Corporation welcomes the reference in para 3.4.2 to the need for boroughs to work together to ensure a consistent approach to the identification of areas appropriate for tall buildings, especially near borough boundaries. Areas appropriate for tall buildings are defined in the City to a large extent by designated views protection, either through the LVMF, or the City's own St Paul's Heights and Monument Views policies. The majority of views of St Paul's Cathedral are from surrounding boroughs and the City's St Paul's Heights policy is operated in co-operation with neighbouring boroughs, with key viewpoints acknowledged in their development plans. The City Corporation has worked with its neighbouring boroughs to ensure a consistency of approach to protected views policies and seeks to continue this approach.</p> <p>The conservation areas on Figure 3.2 are difficult to see, particularly in the City and could be made clearer. To better understand the clustering of tall buildings and areas that are inappropriate for tall buildings within the City of London, Figure 3.2 should also show the St Paul's heights and Monument Views policy areas. Also, the Figure should include the Tower of London Local Setting Area and the Airport Safeguarding Area as further constraints influencing the location of tall buildings in the City.</p> <p>Figure 3.3 needs to be amended as indicative cluster #9 (the City northern cluster/Moorgate) is not identified as a tall building cluster in the City of London Local Plan 2015. The Eastern Cluster (indicative</p> |

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|  | cluster #8 on Figure 3.3) is the only tall building cluster identified in the Local Plan and the only location where the City Corporation would encourage new tall building development.  |
| 3.5 Public realm in the CAZ<br><br>Paragraph 3.5.5   | The City Corporation supports the emphasis in this section on the need for a high quality public realm within the CAZ, but suggests that para 3.5.5 should also acknowledge that public realm has a significant and positive relationship not just with the vitality of retail, but also its attractiveness as a place to locate and do business in. Through consultation on the City of London CIL and individual public realm enhancement schemes, businesses in the City have consistently highlighted the importance of a high quality public realm in attracting and retaining businesses and their employees and stimulating further business growth. |
| Inclusive access in the CAZ, climate change adaptation, surface water management and environmental quality         | The City Corporation supports the guidance on these elements within the draft SPG, but notes that much of the text provides general guidance rather than being specific to the circumstances of the CAZ, where the ground level and public realm are often very busy and space is limited. The City Corporation would like to see more CAZ specific examples of the impact of these issues and how they can be addressed at the local level.  |
| <b>Section 4 Housing in CAZ</b>  |   |
| 4.2 Enabling housing capacity without compromising strategic CAZ functions<br><br>Paragraph 4.2.2                  | The City Corporation supports the overall approach to residential development set out in para 4.2.2, specifically that development should be managed sensitively to ensure it does not strategically constrain the overall provision of office floorspace and requiring boroughs to have regard to the strategic functions of the CAZ.  |
| 4.4 Balancing the need for housing alongside offices and other strategic functions<br><br>Paragraphs 4.4.1 & 4.4.2 | The City Corporation supports the re-iteration in para 4.4.1 that residential development is not considered appropriate in commercial core areas of the City and that land use swaps, credits or payments in lieu should be used in the City to secure housing provision elsewhere.<br><br>The City Corporation also supports the re-iteration in para 4.4.2 that greater weight should be given to office development in other parts of the City.  |
| Paragraph 4.4.5  | The City Corporation supports the view that 'greater weight' does not mean a prohibition of housing outside the City's commercial core. The City of London Local Plan identifies a number of residential clusters outside the commercial core where new residential development may be appropriate, and which   |

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|  | includes existing housing estates including the Barbican, Golden Lane, Middlesex Street and Mansell Street estates.  |
| 4.8 Social Infrastructure<br>Paragraphs 4.8.1 & 4.8.2    | The City Corporation supports comments in the draft SPG on the need for boroughs and the City to consider social infrastructure provision alongside commercial, retail, residential and mixed use development. Such infrastructure in appropriate locations will ensure that the CAZ remains an attractive destination for international investment, workers, visitors and residents.  |
| <b>Section 5: Transport, Movement and Infrastructure</b> | The City Corporation supports the overall approach to improve transport, movement and infrastructure within the CAZ. Improvements are essential, particularly in the City, to enable planned office growth to take place in a sustainable fashion.   |
| Paragraph 5.2.22 and Figure 5.2                          | <p>Para 5.2.22 outlines plans for the extension of river piers within the CAZ. Mention should also be made of the proposals to move Blackfriars Pier and create a new open space as part of the development of the Thames Tideway Tunnel.</p> <p>Figure 5.2 should show all existing piers, as well as those with proposed improvements. Blackfriars Pier should be identified.</p>  |
| Figure 5.5   | <p>This is titled 'Planning Obligations', but also refers to CIL. CIL is not an obligation – the figure would be better re-named as Planning Contributions.</p> <p>Figure 5.5 indicates a view that CIL spending authorities will be required to ensure CIL monies are targeted at infrastructure works, including strategic works that span London and the wider metropolitan area. Borough CIL spend is a matter for individual boroughs in accordance with local infrastructure priorities, the Mayor cannot 'require' borough level CIL monies to be spent on strategic infrastructure, although he can request allocation of CIL for Mayoral priorities. Under CIL Regulation 59, the Mayor is able to levy his own CIL for the purposes of roads or transport infrastructure, including Crossrail.</p> |
| Paragraph 5.4.15   | The City Corporation supports the Mayor's ambition to improve the infrastructure for cycling within the CAZ, including appropriate expansion of the Cycle Hire network, but this ambition needs to be balanced against the capacity of the City's streets to accommodate additional movements and further Cycle Hire docking stations. The issue of on-street capacity and the relationship between cycling and walking needs should be acknowledged in the draft SPG.   |
| Paragraph 5.4.21   | The City Corporation supports initiatives to improve the walking experience within CAZ. However the  |

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|  | proposal for a CAZ strategic walk network has not been agreed with central London Boroughs and it is premature to include it within the draft SPG at this time. The draft SPG could, instead, refer to the potential for enhancement of the London Plan Strategic Walk London Network to address specific concerns and issues within the CAZ.  |
| Figure 5.8 Legible London  | Figure 5.8 highlights that the City is outside of the Legible London wayfinding system. The City Corporation has its own wayfinding system which is similar to Legible London and this should be acknowledged within the draft SPG.  |
| Freight delivery, loading and servicing in the CAZ<br><br>Paragraph 5.5.15 | The City Corporation supports the need to identify and protect micro consolidation sites to support the servicing of development in the CAZ. The Corporation also supports the recognition of the potential for the consolidation of servicing of groups of buildings. The draft SPG could usefully add reference to the potential for consolidation of servicing for individual large buildings with multiple occupiers. The City Corporation would welcome the opportunity to work with the Mayor to consider how such consolidation centres can be delivered through the planning process.                                |
| 5.7 Guidance on other infrastructure<br>Connectivity                       | <p>The City Corporation supports the approach taken in the draft SPG to encouraging improvements in digital connectivity, including the use of communal access arrangements and CLF's work on wayleaves. This is a particular issue in the City where there is an identified lack of affordable high speed broadband for SMEs and residents.</p> <p>The draft SPG should also acknowledge some of the difficulties in delivering improved connectivity, including the need for new transmitting equipment on street furniture, the potential impact on heritage assets and the problem of sub-pavement cable congestion.</p> |
| Energy Infrastructure  | The City Corporation supports the approach taken to energy infrastructure and decentralised energy and heat networks. The Corporation has worked closely with the Mayor in seeking amendments to existing regulations to allow for investment ahead of need, and will continue to work with the Mayor to ensure the effective delivery of energy capacity to support new office and other development across the CAZ.  |
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| <b>Section 6 CAZ Geography</b>   |  |
| Other CAZ Clusters<br><br>Paragraph 6.2.4                                  | The City Corporation supports the further clarification that the financial and business services district in the City is one of the most significant clusters not specifically identified on the CAZ diagram. Given its importance and the statements within this draft SPG, the Mayor should consider including specific designation on the CAZ diagram through the next review of the London Plan.   |



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| Figure 6.2   | Figure 6.2 could be amended to more clearly reflect the industry employment clusters in the City. For example, it does not appear to include the health cluster at St Bart's Hospital or the art/cultural cluster at the Barbican.  |
| 6.5 CAZ opportunity and Intensification areas                                | There are several references to the publication of the City Fringe OAPF. At the time of the publication of the draft CAZ SPG this document had not been published. The draft SPG will need to be revised to reflect the exact position at the time of publication.  |
| Paragraph 6.6.3  | This paragraph sets out the Mayor's view on office to residential permitted development rights within the CAZ. This section will need to be amended following the announcement on 13 <sup>th</sup> October of the Government's intention to extend current exemptions within the CAZ to allow time for any article 4 directions to be put in place.                       |
| Relationships with the wider south east metropolitan area<br>Paragraph 6.7.4 | This paragraph highlights relationships between the CAZ and the wider area beyond London. Whilst reference is made to functional transport linkages, including airports, the City Corporation considers that more emphasis should be given to the importance of airports in and around London in supporting the CAZ's international financial and business services role. |