

Committee(s):	Date(s):
Planning & Transportation	15 Dec 2015
Subject: Response to the Mayor's public consultation on the Draft Central Activities Zone Supplementary Planning Guidance	Public
Report of: Director of the Built Environment	For Decision

Summary

In September 2015, the Mayor published draft Central Activities Zone (CAZ) Supplementary Planning Guidance for public consultation. The SPG is intended to provide further guidance to the CAZ policies in the London Plan, ensuring that the right balance is struck between different land uses in different parts of the CAZ. In particular, it aims to ensure that the need to accommodate new housing growth is not at the expense of the business, culture and other strategic functions of the CAZ.

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.

The draft 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.

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.

Recommendation(s)

Members are recommended to:

1. Welcome the draft SPG and its overall approach that supports the City as a strategically important, globally orientated financial and business services centre;
2. Approve the response contained in this report and the more detailed

comments set out in Appendix 1 as the City Corporation's formal response to the Mayor of London's draft Central Activities Zone Supplementary Planning Guidance.

Main Report

Background

1. The Mayor's London Plan identifies London's Central Activities Zone (CAZ) and Policy 2.10 Central Activities Zone – Strategic Priorities provides policy guidance on the Mayor's priorities for the CAZ. The City of London lies entirely within the CAZ. The London Plan seeks to sustain and enhance the City of London as a "strategically important, globally-orientated financial and business services" centre. The Plan indicates that the Mayor will work closely with boroughs and other stakeholders to prepare supplementary planning guidance to co-ordinate implementation of strategic policy in its unique circumstances.

Current Position

2. In September 2015, the Mayor published draft CAZ Supplementary Planning Guidance (SPG) for public consultation. The draft SPG is intended to provide further guidance to the CAZ policies in the London Plan, ensuring that the right balance is struck between different land uses in different parts of the CAZ. In particular, it aims to ensure that the need to accommodate new housing growth is not at the expense of the business, culture and other strategic functions of the CAZ.
3. The draft SPG identifies a number of key CAZ strategic functions which are of particular relevance to the City of London: an agglomeration of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions; uses connected with science, technology, media and telecommunications; medical and legal establishments of regional, national and international importance; arts, culture, leisure and entertainment uses/clusters of regional, national and international importance.
4. The draft SPG is divided into six sections, each providing further policy guidance on a specific function of the CAZ: section 1 promoting the CAZ as a competitive business location; section 2 promoting strategic clusters of culture, arts and entertainment; section 3 enhancing the distinct environment and heritage of the CAZ; section 4 housing requirements; section 5 transport, movement and infrastructure; and section 6 geography of the CAZ.
5. The draft SPG is available on the GLA website at:
<http://www.london.gov.uk/priorities/planning/consultations/central-activities-zone-draft-supplementary-planning-guidance>

Proposed City Corporation Response

6. The following paragraphs address key issues within the draft SPG relevant to the City. It is recommended that these comments are submitted to the Mayor

as the City Corporation's formal response to the draft SPG, alongside detailed comments in the schedule attached at Appendix 1.

Section 1: Promoting the CAZ as a competitive business location

7. The City is identified as a "strategically important, globally-orientated financial and business services" centre within the CAZ, and the overall approach in the SPG is therefore supported.
8. The draft SPG recognises the CAZ's key role as an internationally significant office location, which requires a tailored approach to the application of national policy to address its distinct circumstances. The draft SPG highlights the need for the retention of the current exemption in the CAZ from national permitted development rights for the change of use of offices to residential. The City Corporation supports this approach and will work with the Mayor to continue to ensure that Government is aware of the importance of the CAZ as an internationally and nationally significant office location.
9. The draft SPG contains specific planning policy protection for the City of London. Table 1.1 provides guidance on the appropriate balance to be struck between office and residential development in the CAZ, indicating that "residential development is considered inappropriate in the commercial core area of the City of London". In other parts of the City, "offices and other CAZ strategic functions should be given greater weight relative to new residential." The draft SPG indicates that the commercial core should be defined locally. The draft SPG provides further advice on determining planning applications for the change of use of offices to residential, quoting the City of London Local Plan and Office Use Supplementary Planning Document (SPD) as examples of good practice.
10. This strong protection for office development in the City and explicit support for the approach taken in the City's Local Plan is welcomed. The approach to the protection of the City's office cluster accords with the aims of the City's Local Plan which seeks to protect existing office uses and maintain the City's strategic office role, and is strongly supported.
11. London Plan policy normally seeks mixed use development on sites within the CAZ, requiring housing to be provided alongside new office development. Reflecting the strategic importance of the City's office cluster, the draft SPG confirms that the City should be exempt from the principle to provide on-site housing. Instead, the draft SPG confirms that appropriate cash-in-lieu payments should be made within the City to fund new affordable housing provision elsewhere. This is entirely in line with the City's Local Plan and detailed guidance in the City's Planning Obligations SPD and is supported.

Section 2: Managing the attractions of the CAZ as a global retail, cultural and visitor destination

12. This section of the draft SPG provides guidance on the promotion of arts, cultural and entertainment as strategic functions within the CAZ. The Barbican is identified within the London Plan as a Strategic Cultural Area and the

promotion of such areas within the draft SPG is welcomed. Support for cultural, arts and entertainment activities is also in line with the City Corporation's aspirations for enhancements to this part of the City as a Cultural Hub.

13. The Barbican is an established residential area, and it is important that the amenity of existing residents and the integrity of the listed building are maintained. The draft SPG requires sensitive management of the impact of evening and cultural uses on other land uses, including residential, taking account of the cumulative impact of any concentrations of activity. There is also support for the protection of the special cultural and heritage value of strategic cultural areas. These provisions are supported.
14. A growing concern for the Mayor is the London-wide loss of existing cultural venues and performance spaces. The draft SPG responds to this by requiring new residential development in the vicinity of existing venues to include necessary design measures to mitigate and minimise any potential noise and amenity issues. Whilst this may not prevent future conflict between residents and night-time activity, the recognition of the need to consider noise and amenity disturbance in the location of new residential development is welcomed. Such issues are also relevant to proposed new cultural venues.

Section 3: Enhancing the distinct environment and heritage of the CAZ

15. This section recognises the distinct environment and heritage of different parts of the CAZ and provides for measures to protect and enhance these aspects. The City of London has a unique mix of heritage assets and modern office buildings, overlaid on a medieval street pattern, which plays a major role in its attractiveness as a major international business centre, and this element of the draft SPG is welcomed.
16. The draft SPG highlights the need for a plan-led approach to tall buildings and this is supported as it accords with the approach taken in the City's Local Plan.
17. The draft SPG identifies the need for high quality, well-managed public spaces, to provide an attractive retail environment and improve quality of life. The draft SPG needs to recognise that the quality of the public realm is also a major factor in attracting business investment into the CAZ and maintaining its strategic commercial role.

Section 6: Transport, movement and infrastructure

18. The draft SPG supports continued investment in the improvement of transport infrastructure to ensure that the CAZ remains an attractive place to work, live and visit. This overall approach is supported.
19. The draft SPG supports the concept of micro-consolidation centres within the CAZ to support the servicing of development and the potential for consolidation of servicing for groups of buildings. The draft SPG could usefully be extended to consider the potential for the consolidation of servicing of individual large buildings with multiple occupiers. The City Corporation would

welcome the opportunity to work with the Mayor to consider how such centres can be delivered through the planning process.

Corporate & Strategic Implications

20. The draft SPG provides guidance on the interpretation and implementation of London Plan policy for the CAZ. The London Plan is part of the development plan for the City of London and provisions within the draft SPG will impact on the determination of individual planning applications and the drafting of future City Local Plan documents. The draft SPG is in accordance with the strategic priorities within the existing City Local Plan and will support its implementation.

Conclusion

21. The Mayor of London is consulting on a draft Central Activities Zone SPG to provide further guidance on the implementation of London Plan policy. The draft SPG aims to ensure that the need to accommodate new housing growth is not at the expense of the business, culture and other strategic functions of the CAZ.
22. The draft SPG highlights the role of the City of London as a “strategically important, globally-orientated financial and business services” centre. It sets out an approach which seeks to enhance this function, indicating 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.
23. The overall approach of support for the City’s commercial role is in line with the long-standing approach to planning policy set out in the City of London Local Plan. The draft SPG will give additional weight to the continued protection of the City’s strategic commercial role and so the draft SPG is strongly supported.

Appendices

- Appendix 1 – City of London Corporation’s response to draft Central Activities Zone Supplementary Planning Guidance, September 2015

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