

# Local Plan Issues and Options

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A consultation document on the key planning issues facing the City and the options available for shaping the City up to 2036 and beyond



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## Responding to this consultation

The Local Plan is a plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. This is your opportunity to help shape the City's new Local Plan before we begin to write any policies.

This document identifies a wide range of issues and challenges that face the City over the next 20 years. It poses a series of questions, grouped into topics such as offices, housing and open spaces. Some of these questions contain potential policy options, but no decisions have yet been taken about preferred options for the new Local Plan.

**We are keen to receive views on any aspect of the Local Plan and you are welcome to respond to any or all of the questions we have set out.**

Even if there is only one question that you wish to answer, please feel free to do so. We are happy to receive general comments on the planning issues facing the City, or ideas and suggestions about any matters that you feel have not been fully addressed in this document.

Consultation will take place over a six-week period starting on **xx September 2016 and ending on xx October 2016**. During this period, a number of consultation events will be held, at different times of the day to suit City businesses, residents and visitors. If you would like to arrange for officers to speak to your organisation separately, please contact us by one of the methods shown below.

### How to respond

An online questionnaire is available at:  
**[www.cityoflondon.gov.uk/planningpolicy](http://www.cityoflondon.gov.uk/planningpolicy)**

Or you can send your comments by email to:  
**[localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk)**

Or you can write to us at:  
**Department of the Built Environment, City of London, PO Box 270,  
Guildhall, London EC2P 2EJ**

If you have any questions, you can call us on:  
**0207 332 1846 or 0207 332 1038**

**Remember to please send us your comments by xx October 2016**

## Introduction

### What is a Local Plan?

- i The Local Plan is a plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. The Local Plan sets out the City Corporation's vision, strategy and objectives for planning the Square Mile, together with policies that guide decisions on planning applications. The Local Plan includes Policies Maps showing which policies apply to specific locations.

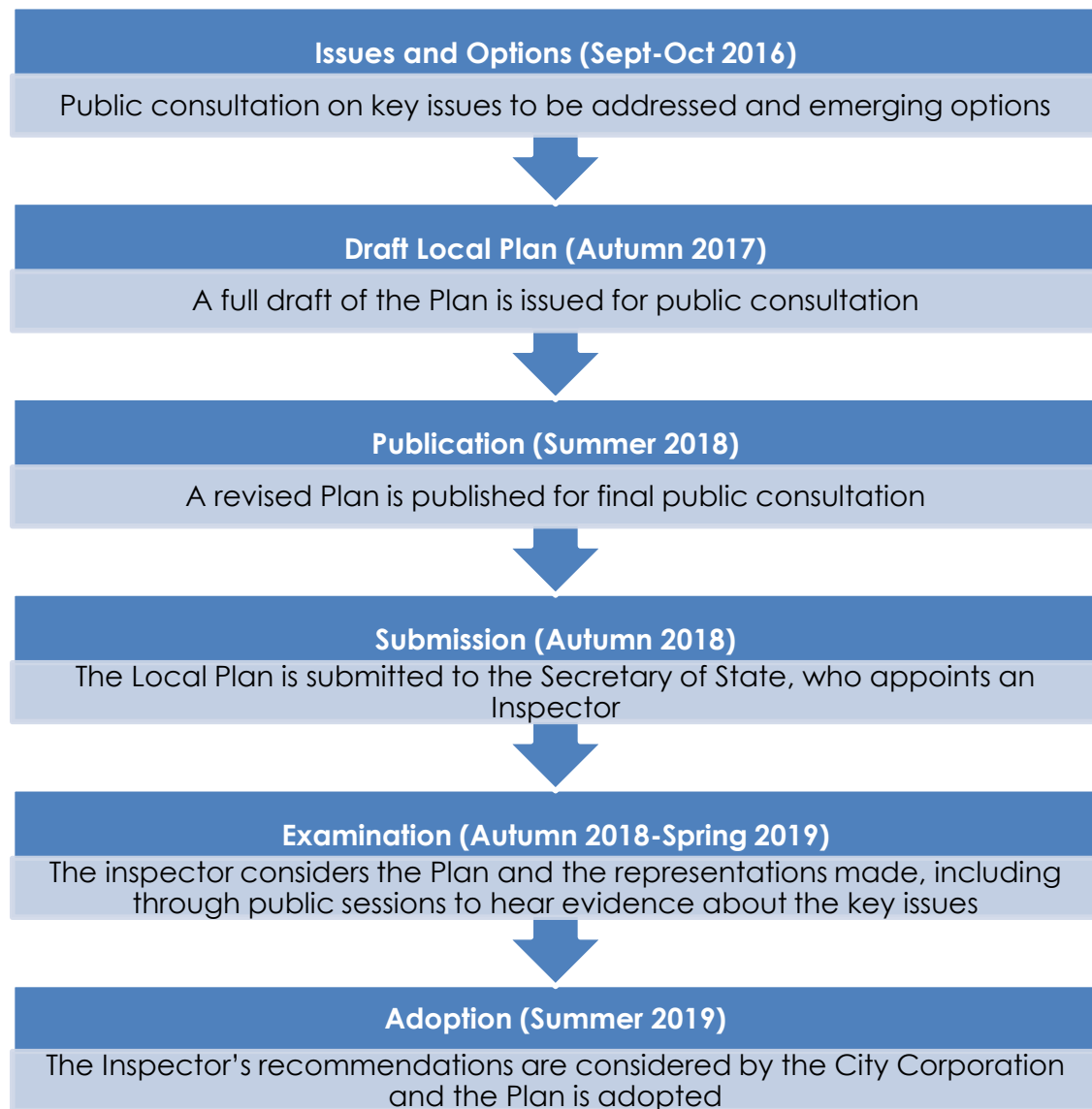
### Why is the City preparing a new Local Plan?

- ii The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look. An early review of the Local Plan will allow the City Corporation to consider the implications for the City's role as a world leading financial and business centre and for future development arising from the significant change in our relationship with the EU.
- lii As well as addressing potential changes arising out of the referendum, the Local Plan has to consider the implications of national and London-wide planning policy changes and changes in development trends which indicate a need for an early review.
- iv The Government continues to bring forward a wide range of changes to planning and housing, notably through the Housing and Planning Act 2016. A number of existing Local Plan policies will need revisiting to ensure that they remain up-to-date and responsive to national policy.
- v The City's Local Plan has to be in general conformity with the London Plan prepared by the Mayor of London. 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 an increased housing target for the City and updated employment projections up to 2036. By preparing a new Local Plan covering the period to 2036, the City Corporation will be able to address the revised requirements of the London Plan, whilst maintaining a positive planning framework to meet the City's long-term needs.

- vi The current Local Plan evolved from the 2011 City of London Core Strategy, which was based on evidence collected prior to 2011. The Local Plan now requires updating to address recent development trends and to reflect the City Corporation's emerging priorities and aspirations.

### **The stages of preparing the Local Plan**

- vii This Issues and Options document represents the first stage in developing the new Local Plan. Production of the Plan will be informed by several rounds of public consultation, together with evidence gathering and the appraisal of policy options for their sustainability, equalities and health implications. The Local Plan must be submitted for examination by an independent planning Inspector appointed by the Secretary of State. Once found sound by the planning inspector it can be adopted by the City Corporation.
- viii Figure 1 below illustrates the proposed stages in the preparation of a new City of London Local Plan, together with an indicative timescale:



**Figure 1: The main stages of preparing the new Local Plan**

- ix The indicative timetable is based on the current legislative and regulatory framework for planning. The City Corporation is keen to progress the review as quickly and efficiently as possible, while allowing for proper consideration of its proposals through public consultation. Progression beyond the current Issues and Options stage and subsequent timings will be subject to review following this consultation.
- x The Local Plan timetable will be influenced by external factors, including the timetable and terms of the UK's exit from the EU and future trading relationships with external partners, as well as further legislative change to the planning system.

### Purpose and format of this document

- xi The purpose of this consultation is to gain the views of a wide range of individuals and organisations with an interest in the future development of the City of London, which includes businesses, residents, developers, land owners, funding and amenity groups. All responses to the consultation will be carefully considered by the City Corporation and will inform the content of the Draft Local Plan.
- xii This document sets out the City Corporation's initial views on the key planning issues facing the City. We are keen to hear whether we have got them right, or whether other issues and options should be considered. It starts with some background information about the planning policy context within which the Local Plan is being prepared and is accompanied by a separate evidence document which outlines recent development trends and is available on the City Corporation's website. Topics are grouped into five broad themes, which for ease of reference are based on those in the adopted Local Plan:
- A World Financial and Business Centre;
  - Key City Places;
  - Culture and Heritage;
  - Environmental Sustainability; and
  - City Communities.
- xiii Under each topic, we have posed some questions based on the issues and challenges that we have identified. Your answers to these questions will help us develop detailed policies for the next stage of the plan. You need only answer the questions that you are interested in and you are very welcome to put forward your own ideas and suggestions if you feel that we have not identified the full range of issues or potential policy options. We are particularly interested to hear your views on future development trends following the EU referendum.

## Section One: Policy context

- 1.1 As a world leading international financial and business services centre, the future prosperity of the City will depend to a large extent on international and national economic considerations and other external policies, particularly the terms of the UK's exit from the EU and its future trading relationship with the EU and the rest of the world. Within this wider framework, the Local Plan can provide an environment which encourages appropriate development and is responsive and adaptable to change. The Local Plan will be influenced by national and London-wide planning policies and guidance, as well as other plans and strategies produced by the City Corporation or its partners and have regard to policies and strategies prepared by our neighbouring boroughs. This policy context may limit the range of options available to us.

### National planning policy and guidance

- 1.2 Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.

### The London Plan and other Mayoral strategies

- 1.3 The Mayor of London has to prepare a spatial development strategy, the London Plan, and to keep it under review. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan and there is no need to repeat its policies within the City's Local Plan.
- 1.4 The Mayor produces supplementary planning guidance to provide further detail on particular policies in the London Plan. The Mayor's guidance will need to be considered in preparing the new Local Plan, particularly where it relates to policies that specifically affect the City such as guidance on the Central Activities Zone. The Mayor publishes a range of other strategies, including for housing and transport that may be relevant to aspects of the Local Plan.



### Duty to co-operate

- 1.5 Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires us to engage “constructively, actively and on an ongoing basis” on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.
- 1.6 The City Corporation works closely and co-operates with its neighbouring boroughs, the Mayor of London, Transport for London and other partners on strategic planning issues. We need to build on these relationships and to take account of planning policies and proposals in adjoining areas, and further afield (where necessary) that may affect, or be affected by, the policies and proposals in the City’s Local Plan. We will work with the new Mayor and with neighbouring boroughs to ensure that the City’s economic growth continues to bring significant benefits for London as a whole, and that cross-boundary connections between the City and its neighbouring boroughs are addressed in a coordinated manner.



**Figure 2: Strategic context - The City of London's location within the Central Activities Zone**

### City Corporation Strategies

- 1.7 The Local Plan will take into account other strategies prepared by the City Corporation or its partners, covering a range of social, economic and environmental issues. The Local Plan can help to facilitate the delivery of such strategies where their objectives involve the use or development of land and may provide a mechanism to co-ordinate and balance the requirements of different strategies.

### Evidence base

- 1.8 The Local Plan needs to be based on robust evidence. The NPPF indicates that evidence gathering should be proportionate, but specifies certain types of evidence that are likely to be needed. The City Corporation already has an extensive evidence base and much of the evidence for the Local Plan will come from this existing data or that published by other organisations, including the Mayor in support of the London Plan.
- 1.9 Additional studies will be needed to inform the new Local Plan. This process has started and will continue as we develop the Draft Local Plan. As these studies are completed, we will publish them on the City Corporation's website. Reference is made to key pieces of evidence, where appropriate, under the relevant topic headings of this consultation document.

### Integrated Impact Assessment

- 1.10 The new Local Plan will be shaped by an Integrated Impact Assessment (IIA). An IIA combines a number of assessment processes into a single document:
- Sustainability Appraisal, including a Strategic Environmental Assessment and a Habitats Regulation Assessment;
  - Equalities Impact Assessment;
  - Health Impact Assessment.
- 1.11 The IIA will assess draft policy options in terms of their compatibility with a range of sustainable development objectives; whether they would have any significant effects on sites designated as being of European importance for their biodiversity; their implications for the promotion of equalities; and their implications for health and wellbeing. The IIA will encompass a number of statutory requirements as well as capturing 'cross cutting' themes that affect the whole Plan. The IIA of the Local Plan will be an integral part of the plan making process and inform the development of detailed policies.

## Section Two: Strategic Objectives

### The City today and drivers for change

- 2.1 The City of London is unique. Although little more than one square mile in size, it is densely built-up and is one of the world's leading financial and business centres. It is a leading driver of the London and national economies, generating £45bn in economic output, equivalent to 14% of London's Gross Domestic Product (GDP) and 3% of the UK's GDP. It provides employment for over 400,000 people, the vast majority of whom use public transport to commute to work from across London and the wider south east.
- 2.2 Offices are the primary land use in the City. It is also home to approximately 8,000 permanent residents as well as universities, hospitals, churches, Livery Halls and transport hubs. It is a major visitor destination with nearly 10.5 million visitors a year. The Square Mile is the ancient core of London, with a rich legacy of history, containing over 600 listed buildings. It contains St Paul's Cathedral, the Monument, the Bank of England and many other well-known landmarks; it adjoins the Tower of London, and it houses arts and cultural facilities of international renown. Views of the City's skyline from the River Thames are globally renowned.
- 2.3 The City's economic dynamism has resulted in a high rate of change and renewal. Having recovered strongly from the global downturn, a substantial amount of construction activity is currently taking place in the City. Looking ahead, whilst the decision to leave the EU may impact on the demand for new development in the short term, over the period to 2036 the City is likely to continue to be successful with continued demand for new development and the refurbishment of existing buildings. There are competing demands on the available space, with pressures for new offices, shops, homes, visitor accommodation and social and community facilities. New development brings added pressures on the City's infrastructure, including the public transport network, streets and pavements, the utilities and IT networks, waste management infrastructure and open spaces.
- 2.4 It is essential that the City is fit for the future in a rapidly changing world. With ever changing technological innovation, constitutional and legislative change, and in the face of competition from financial and business centres across the world, the City needs to maintain and increase its competitiveness as

an attractive place for investors and developers, for businesses and their workers, and for residents and visitors.

- 2.5 The Local Plan can play an important role in delivering a positive and flexible planning framework which supports and encourages new development. The central challenge for the Local Plan is therefore to provide the framework for the sustainable long-term economic growth needed to support the London and UK economies, while at the same time protecting and improving the environment and quality of life for all.

### Strategic objectives

- 2.6 The unique character of the City requires a locally distinctive Plan. The adopted Local Plan has five strategic objectives:
1. To maintain the City's position as the world's leading international financial and business centre;
  2. To ensure that the challenges facing the five Key City Places are met, complementing the core business function of the City, contributing to its unique character and distinguishing it from other global financial districts;
  3. To promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors;
  4. To ensure that the City of London remains at the forefront of action in response to climate change and other sustainability challenges that face high density urban environments, aiming to achieve national and international recognition for its sustainability objectives;
  5. To ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities, aiming for continuous improvement in the City's rating in satisfaction and quality of life surveys.
- 2.7 We will need to review these strategic objectives to see whether they remain fit for purpose or whether they need to be changed to meet the challenges of the next 20 years. Once the strategic objectives for the new Plan are finalised, we will develop and consult upon an updated vision for the City as a whole.

- 2.8 Alongside the Local Plan, the City Corporation is undertaking work to develop a vision for a future/smart city, considering how the use of technology can contribute towards a better quality of life and improved effectiveness and efficiency of infrastructure and services. The Local Plan will provide the framework for ensuring development can contribute positively to meeting future city needs.

### **Strategic Objectives: Questions**

#### **Question 2.1**

What do you consider to be the key challenges that need to be addressed in the Local Plan review?

#### **Question 2.2**

How could the Local Plan help to facilitate the City of London's role as the leading future world class City? Can it provide a flexible framework to respond to significant change whilst providing the certainty sought by much of the development industry?

#### **Question 2.3**

Are the five strategic objectives listed in paragraph 2.6 still relevant? If not, what should the key objectives be in the new Plan?

## Section Three: A World Financial and Business Centre

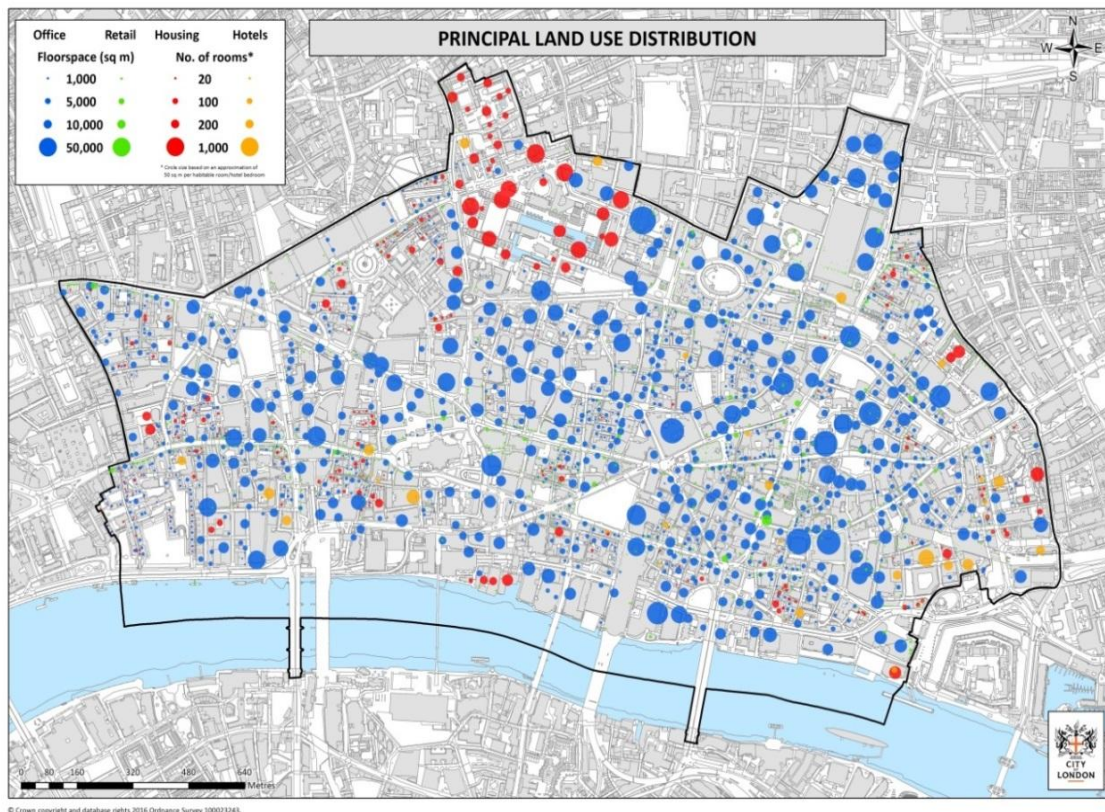
### Offices

#### Overview of issue

- 3.1 The City is a world leading international financial and business centre, with offices as the major land use. The decision to leave the EU may have some effect on the City's future status, but the Local Plan has a role in helping to maintain the City's position by ensuring that a good supply of high quality, sustainable and affordable office accommodation is available to meet the needs of commercial occupiers. It is important that the City has suitable office stock and variety to suit occupiers' needs.
- 3.2 The current City of London office floorspace planning pipeline continues to offer choice to occupiers. Schemes under construction and permitted but not commenced could accommodate the Local Plan's projected increase in office jobs in the City up to 2026. The latest employment projections prepared by the GLA suggest significant continued growth in employment in the City. These projections will need to be revised in light of the referendum decision but it is likely that both employment and office floorspace targets will need to be updated in the Local Plan.
- 3.3 The Local Plan review will need to consider the implications of different business trading relationships on the demand for buildings and sites in the City. The review will need to consider how the Local Plan can contribute towards ensuring that the City remains an attractive business location. It also needs to consider how to respond to the greater diversity of businesses coming to the City, emerging and different ways of working, the growth of agile working, the increasing trend for Small and Medium Enterprises (SMEs) to require serviced offices and co-working space and the greater diversity of businesses seeking to locate in the City. This will have implications for the type and amount of office accommodation required. Flexible, adaptable, affordable workspace (on flexible and shorter leases) is becoming more popular and will be required in future to ensure the City's continued success. More agile working could result in reduced demand for desks and floorspace, further multi-occupancy of buildings and more shared IT and infrastructure services.

- 3.4 The projected growth in employment and population suggests that the City is likely to see continued demand for complementary activities and land uses such as retail, hotels and a range of supporting services. The development of the Cultural Hub will bring further demand for cultural and leisure facilities, including hotels and retail units. At the same time, Government and London Plan policy increasingly prioritise housing development over other land uses. These factors could impact on the overall balance of land uses in the City.

**Figure 3: Distribution of office, retail, housing, hotels**



- 3.5 The City of London has been granted an exemption from national permitted development rights which allow the change of use of offices to housing without the need for planning permission. The City's exemption reflects its role as an office centre of national importance and runs until May 2019. The City Corporation intends to seek an 'Article 4 Direction' which will permanently remove the permitted development right after May 2019 and retain local planning control over the change of use of offices to housing.
- 3.6 The Local Plan review will need to consider whether current office protection policies should be retained unaltered or whether any changes are required. This will be informed by

market trends and the wider geography of employment demand across London. If there is considerable pressure for alternative uses, one option would be to identify a 'Commercial Core' where only offices and complementary uses will be permitted, with a more flexible approach to other land uses including housing outside the Commercial Core, though this may impact on space suitable for SMEs.

- 3.7 The current Local Plan includes a specific reference to assisting developers to identify sites where large floorplate buildings may be appropriate. Many tenants locating in the City are now in the Technology, Media and Telecommunications (TMT) sector and have different requirements. The Local Plan review will therefore need to consider if this policy is still needed to meet future office requirements in the City.



### Offices: Questions

#### **Question 3.1**

Should we protect an identified “Commercial Core” where only offices and complementary commercial uses will be permitted? Outside the core, should we be more flexible allowing a mix of land uses, including housing and hotels? What areas of the City should be outside of any identified core?

#### **Question 3.2**

How should the Local Plan provide the flexibility in workspaces needed to address increased economic uncertainty and possible turbulence?

#### **Question 3.3**

Should we continue with the current approach of setting office floorspace targets with defined 5 year phases, or move to a different approach, possibly using a criteria based policy?

#### **Question 3.4**

How should the Local Plan encourage new and emerging employment sectors? Should we aim to maintain the City’s distinctive employment base, with a concentration of financial and business services, or diversify more?

#### **Question 3.5**

How important is it to use policy to protect a range of office sizes and employment opportunities? Should we have specific policy protection for offices suitable for Small and Medium Enterprises (SMEs)? What type of floorspace are SMEs looking for?

#### **Question 3.6**

Are large floorplate offices still required in the City? Should more flexible floorplates and building designs be encouraged to support new ways of working?

### Utilities Infrastructure

#### Overview of issue

- 3.8 It is essential that utilities infrastructure keeps pace with the changing needs of the City's business, resident and visitor communities. The term utilities infrastructure covers an increasing range of facilities and networks within a shifting pattern of needs. Demand management and early engagement between developers and utility providers should ensure that suitable services are available in a timely manner to meet existing and future customers' needs. More comprehensive strategic planning and investment in utility networks ahead of anticipated need would give developers and occupants greater confidence, reducing the current practice whereby some developments reserve greater infrastructure capacity than is actually required in order to guarantee a constant supply. Providing this strategic planning and confidence in an uncertain economic climate will not be easy.
- 3.9 Providing the right infrastructure for electricity, heating and cooling will be a key issue, particularly in high density areas such as the Eastern Cluster. Accurate identification of infrastructure requirements and funding mechanisms for their implementation are required. Co-operation between providers and collaborative provision are essential in the City to avoid sequential disruption of the City's streets, to minimise street clutter and to achieve the most efficient use of resources.
- 3.10 Future work styles will rely more heavily on mobile networks and digital connectivity. Identification of infrastructure requirements and funding mechanisms are needed to ensure the state-of-the-art wired and wireless connectivity within and outside buildings which is essential to maintain and enhance the City's competitiveness. Policy must be flexible to be able to respond to emerging technologies and trends. Greater sharing of access to goods and services has been enabled through the use of information technology (e.g. bike sharing). Open availability of data, including from sensors and monitoring devices, encourages the creation of innovative products to improve city life (e.g. air quality mobile phone app). This is likely to accelerate in the future with technological changes that we cannot currently envisage. There are amenity implications for the introduction of some enabling technologies, particularly around heritage assets and on congested streets and pavements.

3.11 The large construction sites in the City may require temporary electricity, water, sewerage and waste management infrastructure during the construction phase. Such infrastructure needs to be planned for and integrated with surrounding areas, in order to mitigate the impact on neighbours and to address potential air quality impacts, in line with City Corporation and Mayoral low emission requirements.

### Utilities Infrastructure: Questions

#### **Question 3.7**

How can we ensure that the necessary infrastructure is planned for and installed in a timely and cost effective manner? Could the City Corporation instigate a more strategic and collaborative approach to implementation and funding of utility infrastructure?

#### **Question 3.8**

How can we influence the development of digital connectivity infrastructure ensuring that it is effective but does not detract from the significance of heritage assets or obstruct streets and pavements?

#### **Question 3.9**

Are there further mitigation measures which could be considered to reduce the disruption caused by construction activity in the City? How can we influence the provision of suitable utilities infrastructure for construction sites, ensuring it does not result in unacceptable air quality, noise and vibration impacts or affect the utilities capacity available for neighbouring properties?

### Safety and Security

#### Overview of issue

- 3.12 As a world leading financial and business centre, addressing potential security risks is of critical importance. New development will result in an increasing number of workers, visitors and servicing vehicle movements being concentrated within a small area, particularly in the Eastern Cluster. Transport interchanges and certain streets are already crowded at peak times. The transport network and the public realm need to be designed to safely accommodate the projected increase in the numbers of people using them. The nature of security threats will influence the design of future developments in the City. It will also impact on the City's streets and provide challenges for the City in encouraging greater access to buildings. A key challenge is to minimise the risk of an incident while providing a safe and attractive environment with ease of movement.
- 3.13 The City of London Road Danger Reduction Plan seeks to reduce accidents and the risk of accidents in the City. Options include making areas of the City traffic free or time limited. Anti-social behaviour in the public realm needs to be kept to a minimum, addressing the impact of activities such as skateboarding and street drinking. We need to consider to what extent mitigating or reducing anti-social behaviour can be addressed through planning policy, including through design solutions.
- 3.14 Night-time entertainment is a key attraction for workers and visitors in the City. A greater mix of businesses, along with more retail and leisure facilities and the changing demographic of the City's workforce, means that the City is moving towards operating on a 24 hour basis, 7 days a week, with growing demand for night-time entertainment uses. Current Local Plan policy aims to strike a balance between providing vibrant but well managed night-time uses while minimising the impact on residential amenity. The impact of the Night Tube and the development of the Cultural Hub could be significant, increasing the number of visitors and extending visits until later in the evening. Issues that need to be considered include how to manage dispersal from night-time venues to transport networks, providing toilets in convenient locations and the impact of any emerging clusters of night-time venues on residential amenity.

**Safety and Security: Questions**

**Question 3.10**

What are the key issues concerning night-time entertainment? Should we identify areas of the City either to promote or restrict night-time entertainment uses? If so, which areas would you suggest? Would clear dispersal routes help to minimise the impact of night-time venues?

**Question 3.11**

How can buildings and spaces be designed to create a safe and permeable public realm while protecting against security threats?

**Question 3.12**

Should we include further planning policy measures to tackle crime and anti-social behaviour? If so, what measures?

## Section Four: Key City Places

- 4.1 Five Key City Places were identified in the adopted Local Plan as areas of the City where significant change was likely to occur. Many of the changes originally anticipated have now occurred, so it is appropriate to review the existing Key City Places to see if they remain relevant in the period covered by the next Plan.
- 4.2 We will consider if there are areas not previously identified as Key City Places which would benefit from a specific policy focus in the Local Plan review because of the particular opportunities or challenges presented in those areas. Views are also invited on the overall policy approach to Key City Places, including whether their name should be changed to 'Areas of Change' to better reflect their purpose.

### Key City Places: Questions

#### Question 4.1

Should the concept of Key City Places be retained in the new Local Plan? Should we continue to focus only on areas where significant change is expected? Should they be renamed as Areas of Change?

#### Question 4.2

Are there other areas of the City not mentioned in the questions below that require a particular policy focus? If so, please state why.

## The North of the City/Cultural Hub

### Overview of issue

- 4.3 The North of the City was identified as a Key City Place in the 2015 Local Plan to focus on changes to the area as a result of the construction and opening of Crossrail. By 2019 Crossrail will be open as the Elizabeth Line, with stations at Farringdon/Farringdon East and Liverpool Street/Moorgate, and much of the associated development and public realm enhancement will be complete.
- 4.4 The improved connectivity of this part of the City will coincide with, and help facilitate, its promotion as a Cultural Hub. The

North West of the City is already home to major arts and cultural facilities including the Barbican Arts Centre, Museum of London, Guildhall School of Music and Drama as well as being the home of the London Symphony Orchestra. Proposals to relocate the Museum of London to West Smithfield and to develop a new Centre for Music on the Museum's current site offer the opportunity to significantly enhance the City's cultural offer.

- 4.5 St Bartholomew's Hospital and Smithfield wholesale meat market are longstanding features of this area, creating a distinctive atmosphere. St Bartholomew's Hospital has undergone substantial change with significant investment to create a regional cancer and cardiac specialist centre. Smithfield has been the home of a meat market for hundreds of years and adds vibrancy to the area at particular times of the day and night but can result in traffic congestion, including from articulated lorries, affecting surrounding streets. We will need to reconcile the needs of the meat market with greater pedestrian pressure resulting from Crossrail and the emerging Cultural Hub.
- 4.6 The changes associated with the Cultural Hub will further develop the distinctive look and feel of this part of the City. An estimated two million additional visitors each year are likely to generate demand for more hotels, shops and restaurants, and a coordinated approach with areas immediately beyond the City's boundary would be required. The provision of new cultural and supporting facilities will need to be carefully planned to have regard to the amenity and historic significance of the City's largest residential area which spans the Barbican and Golden Lane estates, both of which are listed. There are numerous other heritage assets in this part of the City, which incorporates eight conservation areas, several grade 1 listed buildings at St Bartholomew's Hospital and many other listed buildings, Scheduled Ancient Monuments and a Registered Park and Garden at the Barbican.
- 4.7 The area around Liverpool Street Station and Broadgate is currently experiencing significant development activity. The opening of Crossrail is likely to result in increased pedestrian flows in and around this area and may stimulate demand for further development. There may be potential for further business intensification in this area, particularly linking with the Tech City area around Shoreditch and Old Street. The accommodation requirements for technology sector businesses may differ from those of traditional City occupiers.

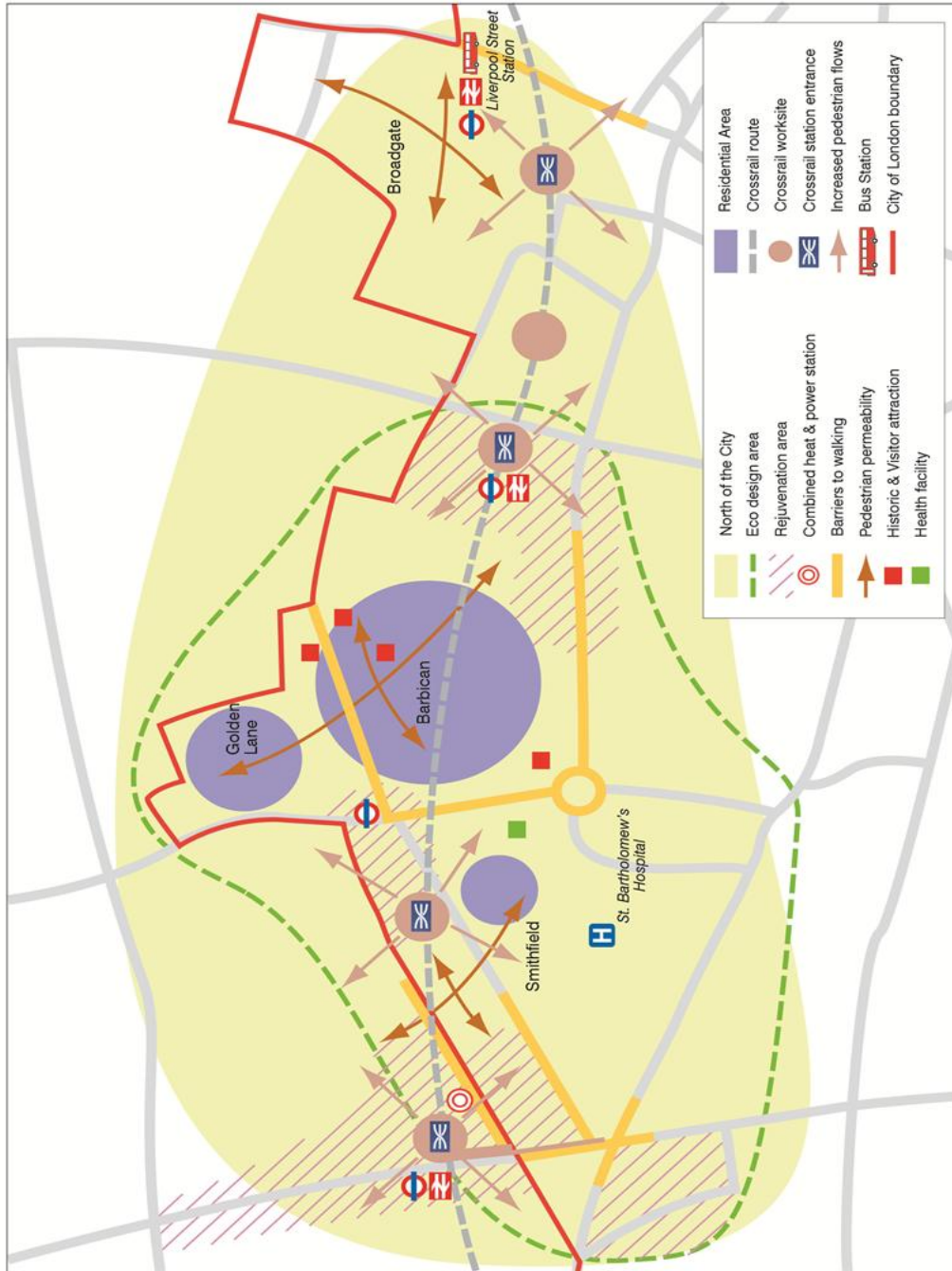


Figure 4: Adopted Local Plan North of the City diagram



**The North of the City/Cultural Hub: Questions**

**Question 4.3**

Should the North of the City continue to be considered as a single Key City Place, or should we focus attention on two specific Areas of Change; the Cultural Hub in the North-West and the Liverpool Street/Broadgate area in the North-East?

**Question 4.4**

What new issues will we need to consider in the Local Plan as the Cultural Hub develops? What other land uses and facilities will be required to support the emerging Cultural Hub, and how can these be accommodated whilst protecting residential amenity? How can we balance the needs of larger numbers of pedestrians with vehicles that are essential for the running of Smithfield and St Bartholomew's Hospital?

**Question 4.5**

How should the business environment around Liverpool Street be planned? Should there be increased support in the Local Plan for technology sector companies, particularly seeking to provide more flexible and adaptable workspaces? What challenges will this bring and how can they be addressed?

## Cheapside and St Paul's

### Overview of issue

4.8 The Cheapside & St Paul's Key City Place covers an area stretching from Paternoster Square in the west to the Royal Exchange in the east. Within this area are two of the City's most iconic buildings, St Paul's Cathedral and the Bank of England, making it one of the key visitor destinations in the City.

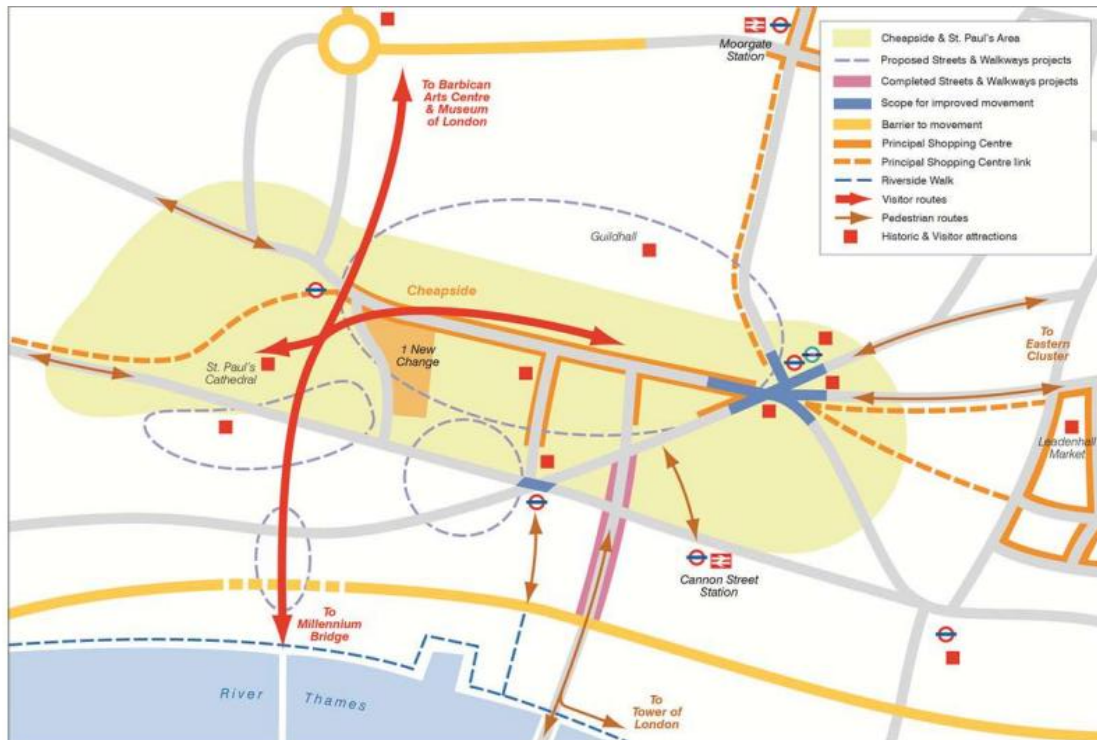


Figure 5: Adopted Local Plan Cheapside and St Paul's diagram

4.9 The main thoroughfare is Cheapside, which has the highest concentration of retail in the City and is the City's 'high street'. In 2010 the One New Change development was completed, adding a significant amount of retail floorspace. The public realm in Cheapside has been improved in recent years to make the environment more appealing for shoppers as well as safer for cyclists and pedestrians.

4.10 The area is one of the most accessible parts of the City of London, with access to 4 Tube stations - Bank, St Paul's, Mansion House and Cannon Street. There is good accessibility for pedestrians, with many visitors using the Millennium Bridge to cross from the South Bank and Tate Modern to visit St Paul's Cathedral and move north towards the Barbican and the Museum of London.

- 4.11 Alongside the retail and visitor provision Cheapside and St Paul's is a major office location with several large developments and refurbishments completed over the past few years.
- 4.12 Whilst major sites within Cheapside and St Paul's have been redeveloped in recent years there are still some key challenges and opportunities facing the area. The creation of a Cultural Hub, centred on the Barbican and Smithfield to the north, will make Cheapside an even more important waypoint for visitors, linking the Hub to the South Bank and Tate Modern. By the early 2020s, Bank Tube Station will have been upgraded, along with surface level improvements to remove much of the road traffic from Bank Junction. These improvements will significantly change the character of the area, potentially creating a new focal point at the eastern end of Cheapside, linking with the Royal Exchange.

### Cheapside and St Paul's: Questions

#### **Question 4.6**

Is there a need to retain a specific policy for Cheapside and St Paul's as a Key City Place? Should the area be modified? If so, how?

#### **Question 4.7**

How can the area provide greater appeal to visitors, workers and shoppers? How should it link to the proposed Cultural Hub to the north?

### Eastern Cluster

#### Overview of issue

- 4.13 Large scale redevelopment and intensification is occurring in the City's Eastern Cluster. This area has potential to accommodate more development and jobs and has fewer constraints on the development of tall buildings. The new office buildings currently under construction or planned could accommodate tens of thousands of additional workers. These new tall buildings will have a significant impact on the City skyline and lead to significant intensification of activity at ground level. Uncertainty following the decision to leave the EU could affect the development programme of current and proposed towers and a flexible approach to planning will be needed to ensure that appropriate development can continue to come forward in this area.
- 4.14 The streets and public spaces in the Eastern Cluster are already congested at peak times. Completion of Crossrail in 2018/19 will substantially improve public transport capacity and will increase footfall on the City's streets. New office development will result in a major increase in servicing vehicle movements. This will bring significant challenges including pressures on the street environment and traffic management, with implications for the public realm and open space, pedestrian movement, building design, servicing and consolidation, security measures and the mix of uses. Utility infrastructure capacity will need to keep pace with the specific needs of occupiers and increases in floorspace.
- 4.15 Recent schemes for major towers in the Eastern Cluster include proposals for consolidation centres. This will be vital in ensuring efficient delivery and servicing to buildings, and minimising the impact on other road users.
- 4.16 The City Corporation is undertaking 3-dimensional computer modelling of the Eastern Cluster to understand better the effect of existing planning policies for this area and its relationship to its environs and other parts of the City. This work is at an early stage but has already confirmed the limits of change in the Cluster that include impacts on the wider setting for the Tower of London. The Local Plan review will consider whether any changes should be made to the area of the Cluster or the current policy approach.

- 4.17 It is important to enable pedestrian movement through the Eastern Cluster to improve connectivity, particularly from Cheapside through to Aldgate. There is potential to prioritise streets in the Eastern Cluster as walking routes. This needs to be complemented by attractive open spaces, retail and leisure uses, while also creating spaces underneath and connecting through buildings and ensuring security risks are minimised.
- 4.18 An area-based approach to the management of the Eastern Cluster will be needed given the intensity of use within this area. This will include a joined-up approach to the public realm and to security measures. A Public Realm Strategy for the Eastern Cluster area is currently being prepared.



Figure 6: Adopted Local Plan Eastern Cluster diagram

**Eastern Cluster: Questions**

**Question 4.8**

Should further intensification be encouraged within the Eastern Cluster? Should the current policy area be retained or should it be modified? If so, where and how?

**Question 4.9**

What changes would be needed to existing infrastructure to accommodate further intensification in the Eastern Cluster?

**Question 4.10**

Should special emphasis be placed on the public realm to cope with increased pedestrian movement in the Eastern Cluster? Should we be pedestrianising streets in the Eastern Cluster and creating more open spaces through buildings? What routes through the Eastern Cluster should we improve?

## Aldgate

### Overview of issue

- 4.19 The Aldgate area has recently undergone a period of rapid change with the gyratory currently being removed and replaced with a two way street system and a new public open space. Transport connections, pedestrian links and public facilities are all being improved. Significant office and residential development in the adjoining borough of Tower Hamlets has also contributed to the creation of a lively mixed use area.
- 4.20 The Aldgate area is located between the Middlesex Street /Liverpool Street Station areas to the north and Tower Hill to the south. All three of these areas are undergoing change and development, resulting in a mix of residential, commercial, entertainment and tourism uses. The development of these areas will create further demand for restaurants, bars and entertainment facilities from workers, residents and visitors. Residential amenity is of particular concern in this part of the City, with the rapid development of a mix of uses creating potential disturbance to residents.

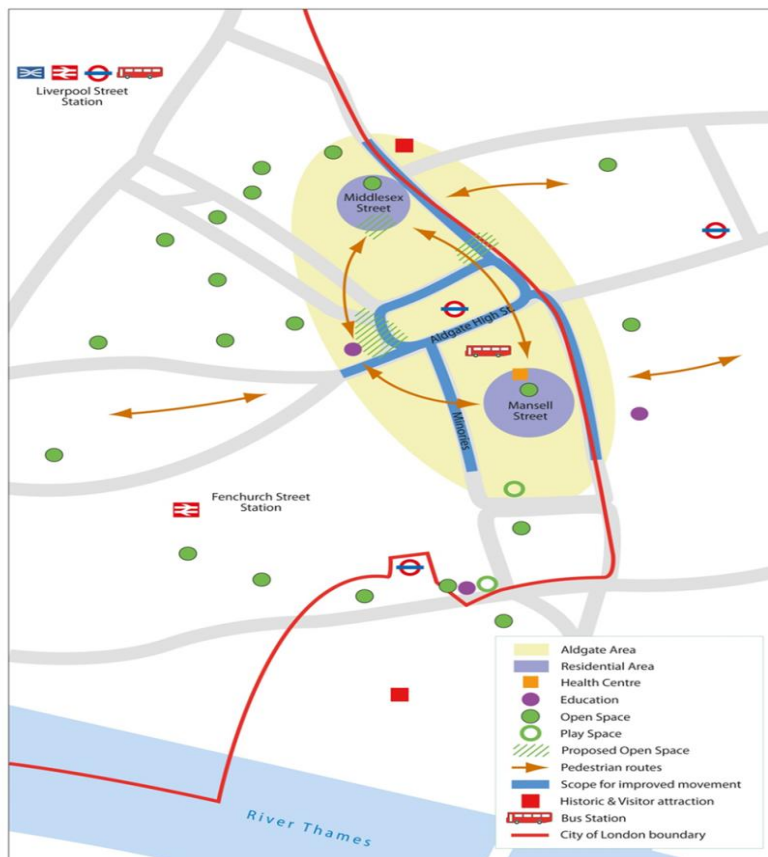


Figure 7: Adopted Local Plan Aldgate diagram

**Aldgate: Questions**

**Question 4.11**

Does the Aldgate area still merit its own Key City Place? If so, should the area be extended to become an East of City area including the area around Tower Hill and/or Middlesex Street? What should be the main policy focus of any newly designated area?

**Question 4.12**

How can the amenity of residents in the Aldgate area be protected within a lively mixed use environment?

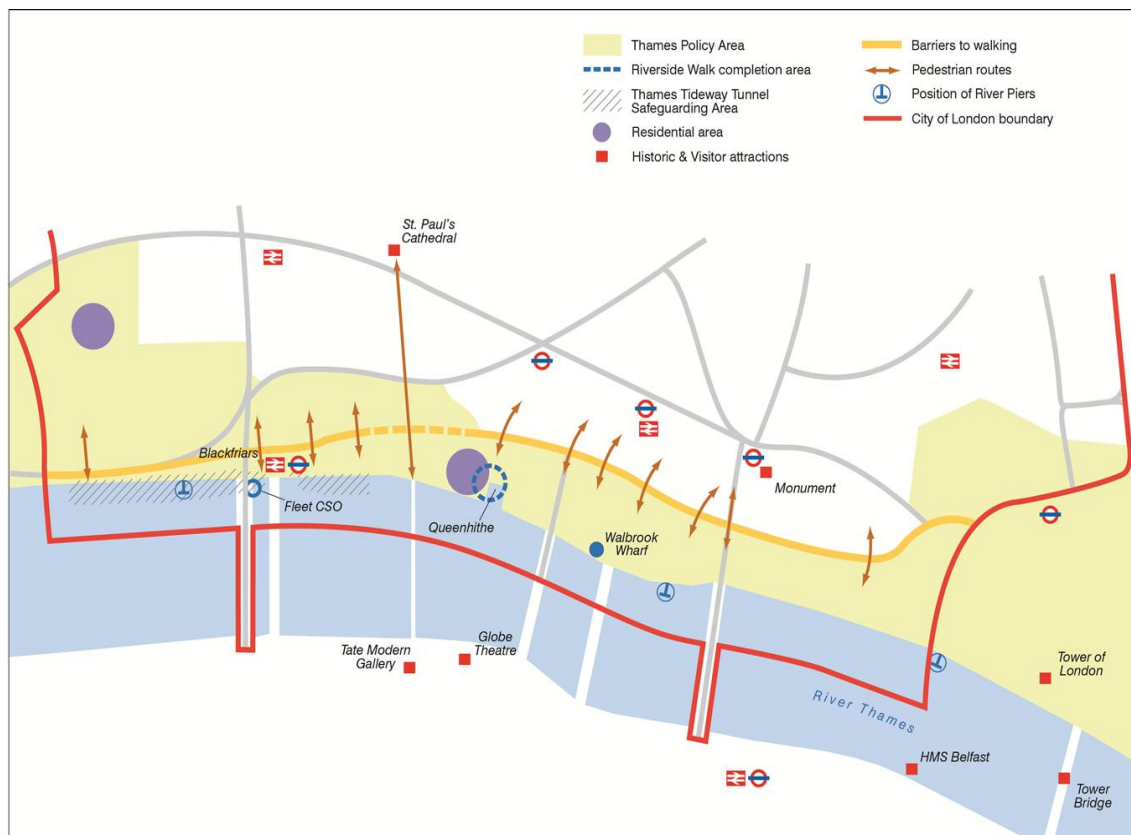


### Thames and the Riverside

#### Overview of issue

- 4.21 The River Thames forms the southern boundary to the City and its riverside walkway provides an increasingly popular destination for workers, residents and visitors to relax. The predominant land use on the City's riverside is commercial offices although this is interspersed with a variety of other uses. Retail uses, including restaurants and bars, enliven the river front in places; hotels attract tourists and business visitors; the Temples legal quarter has a collegiate character; Walbrook Wharf retains the trading and warehouse feel which once dominated the City's riverside; and residential accommodation is provided at Temples, Queenhithe and limited sites elsewhere on the riverside. The adopted Thames Strategy Supplementary Planning Document provides guidance on the current policy approach set out in policy CS9 for the City's Thames riverside.
- 4.22 The future mix of uses on the riverside must support the business City whilst making full use of the benefits that the riverside location affords and retaining its historic environment and amenity value. Future land uses need to consider the increased accessibility and pedestrian numbers following the opening of the London Bridge staircase and proposed future development of the Garden Bridge, as well as the new public open space that will be created at Blackfriars foreshore as part of the Thames Tideway Tunnel project.
- 4.23 A key issue is whether the existing character and mix of uses should be retained, or whether policy should seek to encourage a greater concentration of uses that add vibrancy, such as retail and leisure uses, as has happened on the South Bank.
- 4.24 Passenger movement on the river is supported by Blackfriars Pier in the City, and Tower Pier and Bankside Pier in adjoining boroughs. Freight movement is enabled by Walbrook Wharf which acts as a transfer station for waste barges. Reinstatement of the redundant pier at Swan Lane could assist in realising the Port of London Authority's vision of doubling passenger numbers on the Thames by 2035. Temporary infrastructure sited within the river can enable river transport for construction and demolition materials, reducing the impact of construction traffic on the road network.

- 4.25 New moorings within the City could facilitate greater use of the river for transport and leisure, but may raise operational and environmental issues. Protection and enhancement of river transport infrastructure would provide for the movement of goods and passengers in a sustainable manner, helping to reduce congestion on central London's roads and eliminating associated detrimental air pollution, but there is pressure for other uses at some sites.
- 4.26 The City's flood defences that form the boundary between the riverside walk and the tidal river will need to be raised in future to account for sea level rise. Access for maintenance and for any works that may be needed to strengthen and raise flood defences is crucial for the protection of the City from river flooding, and must be planned in a strategic fashion. Current policy is to refuse development on or over the river except for structures which require a waterside location for river related uses. Continuation of this policy will protect the flood defences and safeguard the foreshore from encroachment enabling opportunities for biodiversity enhancement, but there is pressure for exploitation of the river's foreshore and tidal area for development.



**Figure 8: Adopted Local Plan Thames and the Riverside diagram**

**Thames and the Riverside: Questions**

**Question 4.13**

What mix of land uses will be appropriate on the City's riverside over the next 20 years? Should the Local Plan provide clearer, more prescriptive guidance on the development potential and appropriate uses of sites along the riverfront?

**Question 4.14**

Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?

**Question 4.15**

Should we continue to maintain the current openness of the river by refusing development on or over the river, reinforcing the flood defences and protecting the foreshore for biodiversity?

## Section Five: City Culture and Heritage

### Design

#### Overview of issue

- 5.1 The current Local Plan promotes a high standard of design and sustainable buildings, streets and spaces and seeks to create an inclusive and attractive environment. The Local Plan review provides an opportunity to consider whether the architectural quality of development in the City can be further improved and whether there are any design related issues that now require more emphasis or a different policy approach.
- 5.2 To achieve the highest levels of sustainability, it has to be integral to the design process from the beginning. The current Local Plan encourages the installation of green roofs and green walls in appropriate locations. Sustainability requirements such as those for energy and carbon emissions are set out separately from the design policies and it may be desirable to combine them.
- 5.3 The design of buildings, streets and spaces needs to consider whether they are accessible to all sections of the community, as well as improving the safety and security of the City. As with sustainability issues it is important to integrate access, safety and security requirements into the design from the earliest stages.
- 5.4 Design issues that often arise in the City include the impact of development on daylight and sunlight and the appearance of the roofscape, which is increasingly visible from above as tall buildings, public viewing galleries and amenity terraces are developed.
- 5.5 The Local Plan currently takes a restrained approach to advertising, reflecting the City's character. The review will need to consider whether there is a need to vary this approach.

#### Design: Question

##### Question 5.1

What are the new design issues for the City that we need to consider in the Local Plan review? Should more detail be included in the design policies?

### Visitors, Arts and Culture

#### Overview of issue

- 5.6 The City of London is not only the world's leading financial and business centre, but also attracts millions of visitors each year to its cultural facilities and events. Visitor numbers are expected to increase with the development of the Cultural Hub. Increased visitor numbers may increase the demand for street activities such as mobile food vendors. These, and other on-street activities, can create vibrancy and atmosphere but also cause congestion and generate litter.
- 5.7 While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last 10 years, and now has over 30 hotels, apart-hotels and hostels. There are hotel clusters near St Paul's and the Tower of London, but an absence of hotels in the Cultural Hub area. The development of additional cultural activities is likely to further increase the demand for leisure-related hotel accommodation. Business-related hotel demand will fluctuate with the economic success of the City, but there is likely to be increased demand over the period to 2036.
- 5.8 There is concern that hotel development may displace office accommodation and threaten the flexibility of the City's office market. However, hotels can support the business City by enabling ease of access to meetings, training and conferences, as well as short-term accommodation for staff.
- 5.9 Crossrail stations at Moorgate and Farringdon will result in a large increase in the number of people arriving in the northern part of the City, thereby making this a highly accessible location for new cultural facilities. This will bring amenity challenges given the sizeable residential communities in this part of the City. Arts and cultural activities bring benefits for City residents and workers as well as visitors, but there is the potential to cause disturbance to existing and future residents, unless well-managed.

**Visitors, Arts and Culture: Questions**

**Question 5.2**

Are there certain areas of the City where hotel development is inappropriate, or where hotels should be encouraged? Should these areas be identified in detail or more generally?

**Question 5.3**

Should we set a target for the number of new hotel bedrooms or hotels in the Local Plan? If so, what do you think that target should be?

**Question 5.4**

Should accommodation for business visitors to the City be prioritised over accommodation for tourists? If so, what role can the planning system play in ensuring this is delivered?

**Question 5.5**

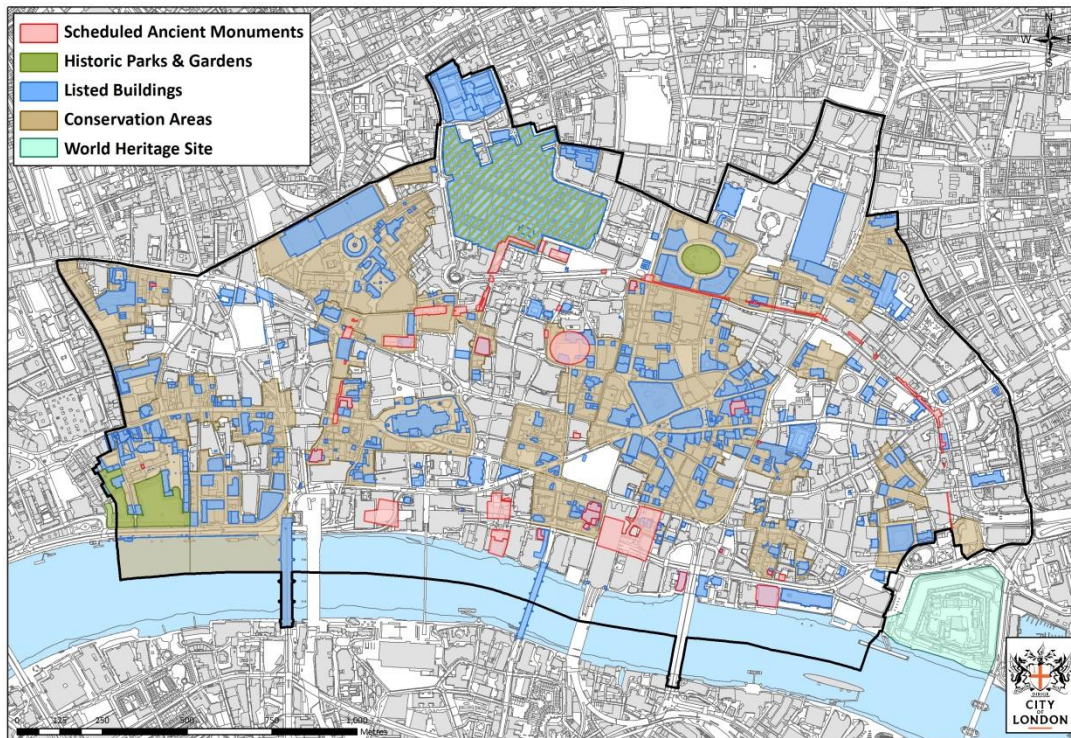
Should the Local Plan encourage uses and activities which could attract more visitors? Should this include on-street activities? What type of activities would be appropriate in the City and what types would be inappropriate?

### Historic Environment

#### Overview of issue

- 5.10 The City has a varied and high quality historic environment including over 600 listed buildings, 26 conservation areas, 48 scheduled monuments and 4 historic parks and gardens. The Tower of London World Heritage Site lies just outside the City's eastern boundary. The City's rich variety of heritage assets, alongside contemporary architecture, defines the City as a unique place valued by businesses and visitors.
- 5.11 The NPPF encourages Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This includes managing positive change affecting heritage assets, including better revealing and enhancing their significance, adaptation to new uses and retaining and repairing buildings, structures and places. A positive strategy can diversify and enhance the City's building stock to meet the needs of a range of occupiers for different types of office accommodation, as well as enhancing the character of the City's townscape for residents, workers and visitors. Heritage assets can contribute significantly to a sense of place and well-being, and be better understood through enhanced interpretation and presentation.
- 5.12 The lighting of historic buildings in the City and associated light spillage is an issue that could be considered alongside more general lighting considerations in design and other policies.
- 5.13 National Planning Practice Guidance indicates that the inclusion of information about non-designated assets in Local Plans can be helpful. The City Corporation is preparing a Historic Environment SPD. We need to consider the inclusion of guidance on non-designated heritage assets and what level of detail is appropriate to the Local Plan and SPD.
- 5.14 The Local Plan review will need to consider any recommendations made by the UNESCO World Heritage Committee in 2016 concerning the Tower of London World Heritage Site, together with any implications this may have for historic environment policies. Implications arising from Historic England's revised Good Practice Advice notes will need to be considered. There is an opportunity to improve connectivity from the Tower through the City to the Cultural Hub.

Figure 9: Designated Heritage Assets



## Historic Environment: Questions

### Question 5.6

How can the Local Plan help new development conserve and enhance the significance of heritage assets? What should the Local Plan say about the setting of heritage assets? Should we include policies and guidance within the Local Plan on non-designated heritage assets?

### Question 5.7

How can heritage assets be used in the most adaptable and flexible way to boost their future relevance without harming their significance?

### Question 5.8

Should there be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site?



### Protected Views

#### Overview of issue

- 5.15 The Local Plan protects and enhances significant City and London views of important buildings, townscape and skylines by implementing the Mayor's London View Management Framework (LVMF) which designated strategic views of St. Paul's Cathedral and the Tower of London; protects and enhances local views of St. Paul's Cathedral together with views of and from the Monument, views of historic City landmarks and skyline features; and secures an appropriate setting of and backdrop to the Tower of London World Heritage Site.
- 5.16 Since 1937, the City Corporation has operated the 'St. Paul's Heights' code to protect and enhance important local views of the Cathedral from the South Bank, Thames bridges and certain points to the north, west and east. The long-term consistent and robust implementation of the Heights policy has enabled these views to be successfully protected and enhanced for nearly 80 years.
- 5.17 Only the City's local views policies are subject to amendment in the Local Plan. Responsibility for any amendments to the LVMF lies with the Mayor of London.
- 5.18 The new Local Plan will need to consider any recommendations made by the UNESCO World Heritage Committee in 2016 concerning the Tower of London World Heritage Site, together with any implications this may have for protected views policies.
- 5.19 The pressure to accommodate office floorspace and employment growth has led to an increase in tall building proposals and developments in the City that are outside of protected view policy areas.

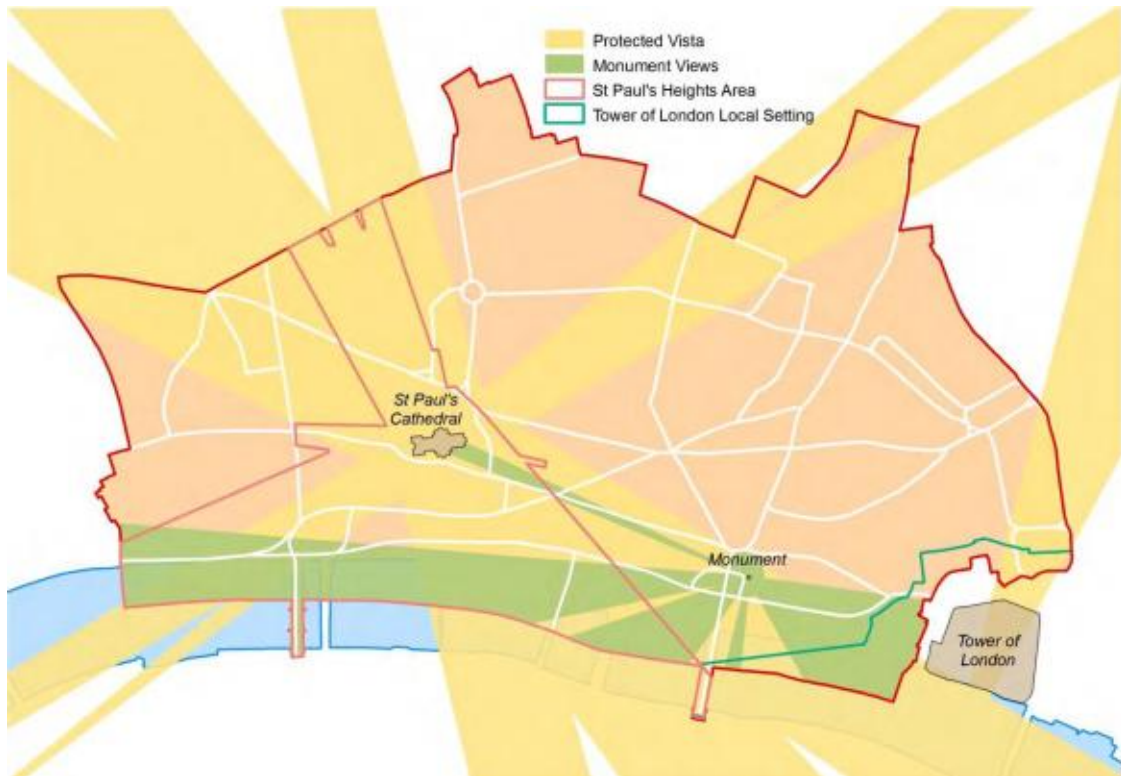


Figure 10: Protected Views Policy Areas

### Protected Views: Questions

#### Question 5.9

Should we maintain the current approach to local view protection in the City? If not, how should the approach be changed and which views should be affected?

#### Question 5.10

How do the current view protection policies affect development in the City? What would be the impact on development in the City if the view protection policies were changed?

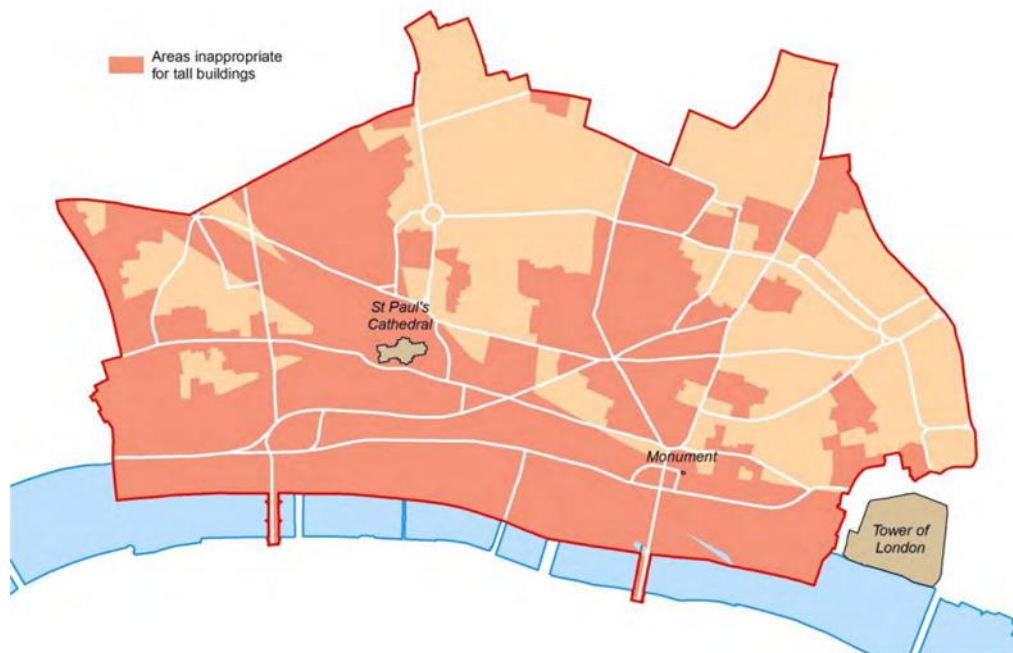
#### Question 5.11

Should we be recognising and protecting new views from publicly accessible locations? If yes, which ones?

## Tall Buildings

### Overview of issue

5.20 The Local Plan identifies those areas of the City where tall buildings would be inappropriate and allows tall buildings of world class architecture and sustainable and accessible design in suitable locations. Consideration is given to the impact of tall buildings on the character and amenity of their surroundings and specifically the significance of heritage assets and their settings.



**Figure 11: Areas Inappropriate for Tall Buildings**

5.21 The entire City is sensitive to tall building proposals and they are assessed against criteria within the Local Plan, the London Plan and Historic England Advice Note 4 Tall Buildings. In much of the City tall buildings are considered to be inappropriate due to constraints imposed by protected viewing corridors and conservation areas. There are fewer constraints in the Eastern Cluster and it is considered the most suitable location for tall buildings. Even in areas not identified as being inappropriate for tall buildings, other constraints, particularly the setting of listed buildings, restrict the potential for new tall buildings. The Tower of London World Heritage Site Management Plan is also a consideration in the eastern part of the City.

5.22 There has been a substantial increase in tall building developments in the last 10 years in the City and across other

parts of central London. There are currently 14 tall buildings in the development pipeline in the City. Further schemes are likely to come forward over the life of the new Plan. Tall buildings are not the only means of accommodating growth and other solutions need to be explored in areas where tall buildings are inappropriate.

### Tall Buildings: Questions

#### **Question 5.12**

Should we continue to promote tall building development in the City and should these buildings continue to be clustered? Should the current tall building cluster in the east of the City be altered? Are there any other areas of the City which could accommodate tall buildings without compromising its distinctive character and heritage?

#### **Question 5.13**

What more should we do to address the wider impacts of tall building proposals, such as pedestrian movement, public realm, micro-climate and wind mitigation? Are there any other factors to consider?

## Section Six: Environmental Sustainability

### Sustainability and Climate Change

#### Overview of issue

- 6.1 The built environment can make a major contribution to reducing carbon emissions thus assisting in meeting London-wide, national and international carbon reduction targets. The City's energy use and corresponding carbon emissions have not increased despite an increase in the City's workforce during the last 10 years<sup>1</sup>. Further employment growth over the period of the next Local Plan could result in higher emissions unless further mitigation measures are undertaken.
- 6.2 New development has to meet increasingly stringent carbon emission and other sustainability targets through Building Regulations, London Plan and Local Plan policies, albeit that adaptation and reuse of existing buildings is inherently more sustainable than demolition and rebuild. Standard assessment methods such as BREEAM and London Plan compliant energy statements should continue to be used to demonstrate the sustainability of individual buildings. Whilst on-site measures are important in meeting these requirements, wider infrastructure, such as district heating and cooling networks, smart grid technologies, green infrastructure and sustainable transport provide even greater opportunities to positively plan for a low carbon future for the City.
- 6.3 Environmental protection and improvement of the City's air quality, noise, light pollution, water quality and land contamination are key priorities. The City's central London location presents challenges, since many pollutants originate outside the City and must be addressed through coordinated strategic action across a much wider area. Traffic associated with City premises; demolition and construction activity in the City; light emanating from City buildings and rain water run-off from the City's paved urban landscape into the combined sewer network, all exacerbate background pollution levels both within and outside the City.
- 6.4 The London Plan and the Mayor's Supplementary Planning Guidance<sup>2</sup> provide a planning framework for environmental

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<sup>1</sup> DECC- Energy Trends sub national energy consumption statistics

<sup>2</sup> Mayor of London - Sustainable Design & Construction SPG and Control of Dust and Emissions SPG

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protection policies, which are supported by the Local Plan. Other plans and strategies, such as the City of London air quality, noise and contaminated land strategies, outline the wider efforts that are required to address environmental protection and enhancement. London-wide initiatives, such as the proposed Ultra Low Emission Zone from 2020, will help to improve the City's environment. The Local Plan review provides an opportunity to consider whether there are any specific local measures that should also be introduced to address the particular pollution issues that the City faces.

- 6.5 Of particular concern is poor air quality which is increasingly being recognised as having detrimental impacts on health. The City of London was declared an Air Quality Management Area (AQMA) in January 2001 for nitrogen dioxide and small particles (PM10) and, despite numerous initiatives to improve the situation, it remains an AQMA for these two pollutants. Tackling this issue could require more radical action to restrict the numbers or types of vehicles on the City's streets, reduce the emissions associated with combustion based heating and cooling systems or limit emissions linked with demolition and construction. The addition of green space and planting within the public realm can help to trap particulate pollution. The planning system could play a part in securing such measures.

**Sustainability and Climate Change: Questions**

**Question 6.1**

Should we identify and positively plan for infrastructure such as district heating and smart grid technologies to enable a more sustainable, low carbon future for the City? What technologies and infrastructure are likely to be viable and operationally feasible in the City? Should they be required in certain types of developments?

**Question 6.2**

What type of climate resilience measures should be incorporated into new development, refurbishment and the public realm? How should such measures be secured?

**Question 6.3**

Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?

### Transport, Streets and Walkways

#### Overview of issue

- 6.6 The City is served by an extensive public transport network with six mainline railway stations, 12 underground and DLR stations and 54 bus routes. There are high levels of pedestrian flow in the City with many business journeys made on foot. Over 90% of journeys to work are made by public transport or active modes of travel such as walking and cycling.
- 6.7 Improvements are being made to public transport provision, particularly with the construction of the Elizabeth Line, which will operate trains to the City at Farringdon and Liverpool Street/Moorgate from 2018/19. The City Corporation will continue to work with Transport for London, Network Rail and the train operating companies to deliver further improvements to public transport.
- 6.8 Despite the current economic uncertainty, the City's working population is likely to continue to grow over the period of the new Local Plan and this will put even greater pressure on its streets, footpaths and walkways and the transport infrastructure in, to and from the City. Increasing numbers of people in the City will result in increased congestion on streets, footpaths and walkways unless more space is provided for pedestrians at peak periods. This is a particular issue in the Eastern Cluster where further development could result in intense concentrations of workers and service vehicles in a constrained area. Buildings with permeable ground floors can help alleviate such congestion by enabling pedestrian flow through street blocks. Transport for London has developed a matrix of street types which recognises the role of the street network in civic life and highlights areas under intense pressure. This type of categorisation could be used to identify a suitable approach for particular streets in the City.
- 6.9 Deliveries of goods, collections of wastes and servicing of premises contribute to congestion, especially in the areas of the highest density development and the narrowest streets. Retiming of deliveries and collections outside peak periods can reduce this contribution to congestion, as can consolidation of deliveries and collections onto fewer vehicles. While consolidation of deliveries would result in more efficient use of road space and fewer overall trips within the City, the use of larger vehicles requires more space within servicing bays for the parking and manoeuvring of those vehicles. Specialised consolidation



centres will almost always need to be located outside the City because of the costs of City land, and will therefore require the agreement of other London boroughs.

- 6.10 Provision of dedicated off-street servicing areas within buildings allows vehicles to be loaded or unloaded without obstructing other road users but takes up considerable space within buildings that cannot then be used for higher-value uses such as office or retail space. As a result, at present only large buildings are required to provide off-street servicing areas.
- 6.11 The City of London was declared an Air Quality Management Area (AQMA) in 2001 for nitrogen dioxide and small particulates (PM<sub>10</sub>) and remains an AQMA for these two pollutants today. Nitrogen dioxide is up to three times the recommended level for human health and PM<sub>10</sub> regularly breaches EU limits. Most air pollution is caused by vehicle emissions and the worst pollution corresponds with the busiest streets in the City such as Lower Thames Street. Restrictions on motor vehicles during the most congested periods may assist in improving the City's air quality. Air quality can also be affected by smoke, fumes, gases, dust, steam and odours.
- 6.12 Cycling in the City has increased significantly in recent years with the 2011 Census reporting that 3.8% of journeys to work in the City were made by cycle compared to 1% in 2001. The City Corporation supports the Mayor's Vision for Cycling in London. Cycle parking is currently required in office developments at a rate of 1 space per 125m<sup>2</sup> of gross floorspace, and the Local Plan review will provide an opportunity to consider if this standard should be amended in the light of increased cycle use. The rapid growth in cycling as a mode of transport has meant that there is not enough on-street cycle parking in the City to meet demand.
- 6.13 Motorcycles are a popular mode of transport in the City and are a more sustainable mode of transport than cars. However, they are more polluting than cycling or walking. Off-street motorcycle parking is currently required at a rate of 10 motor cycle spaces for every one car space, and the Local Plan review will consider whether or not this remains an appropriate standard.

## Transport and Motor Vehicles: Questions

### **Question 6.4**

What actions could the City Corporation take to reduce congestion in the City?

### **Question 6.5**

Should occupiers of large developments be required to only accept deliveries outside peak periods, including at night-time? Should medium-sized buildings be required to provide off-street servicing areas?

### **Question 6.6**

Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?

### **Question 6.7**

How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

**Pedestrians, Cyclists and Motorcyclists: Questions**

**Question 6.8**

How can more open space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianised or time limited, or should certain types of vehicles be restricted in those areas?

**Question 6.9**

Should the requirements for cycling parking in developments be increased, remain the same or be decreased? Should large developments be required to provide off-street public cycle parking spaces?

**Question 6.10**

Should there be more on-street or off-street motorcycle parking in the City?

### Waste and the 'Circular Economy'

#### Overview of issue

- 6.14 The City Corporation is the waste planning authority for the City of London and is responsible for preparing a waste plan for household, commercial and industrial (C&I), construction and demolition (C&D), hazardous and other waste. The waste policies in the Local Plan will fulfil this requirement.
- 6.15 The London Plan household and C&I waste projections estimate that the City produces around 214,000 tonnes of waste per year, the majority of which is C&I waste. Much of this waste is managed by private contractors under commercial arrangements. Waste minimisation and 'circular economy'<sup>3</sup> principles will be needed to ensure that waste levels do not increase over the next 20 years. On some larger developments it may also be possible to incorporate an element of on-site management of waste within the buildings.
- 6.16 All development in the City takes place on previously developed land and this results in large quantities of construction and demolition waste. Reuse and recycling of waste should be improved to reduce the environmental impact of its transport and disposal.
- 6.17 Hazardous waste from premises such as St Bartholomew's Hospital forms a small fraction of the total waste generated in the City but its management must be appropriately planned.
- 6.18 The City Corporation has commissioned new research to look at current and future waste levels and the capacity of managing waste in the City, which will be used to inform the development of Local Plan policies.
- 6.19 The London Plan aims to achieve net self-sufficiency in waste management across London by 2026. The London Plan allocates London's total waste arisings across all London boroughs and the City, according to each area's capacity to provide waste management sites. The City's waste apportionment is currently 100,000 tonnes per year (although this is subject to review through the London Plan). Each local authority must identify sites with the capacity to manage their apportionment. Co-operation

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<sup>3</sup> A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

between local authorities is necessary to ensure that sufficient sites are allocated in appropriate locations. The City Corporation has an agreement with the London Borough of Bexley to meet the City's 100,000 tonne apportionment. The City Corporation is committed to working with the South East London Waste Planning Group and other Waste Planning Authorities to ensure that appropriate arrangements continue.

- 6.20 Walbrook Wharf is the City's only designated waste site and consists of a river wharf waste transfer station which uses river barges to transport waste elsewhere for management. Walbrook Wharf is safeguarded as a waste site and as a river wharf. Any proposal for alternative use of this site would need to include re-provision of the waste site and evidence that the wharf was no longer required.

### Waste and the Circular Economy: Questions

#### **Question 6.11**

What measures could we include to secure waste reduction associated with development? Should we promote circular economy principles, zero waste plans and on-site management of waste for large developments?

#### **Question 6.12**

Should we continue to rely on waste management facilities outside the City? If so, how should we co-operate with other waste planning authorities to ensure adequate and appropriate planning for waste?

#### **Question 6.13**

Should we continue to safeguard Walbrook Wharf as a waste site? Are there any other sites in the City which could be used for waste management, reducing the need to export waste elsewhere?

### Flood Risk

#### Overview of issue

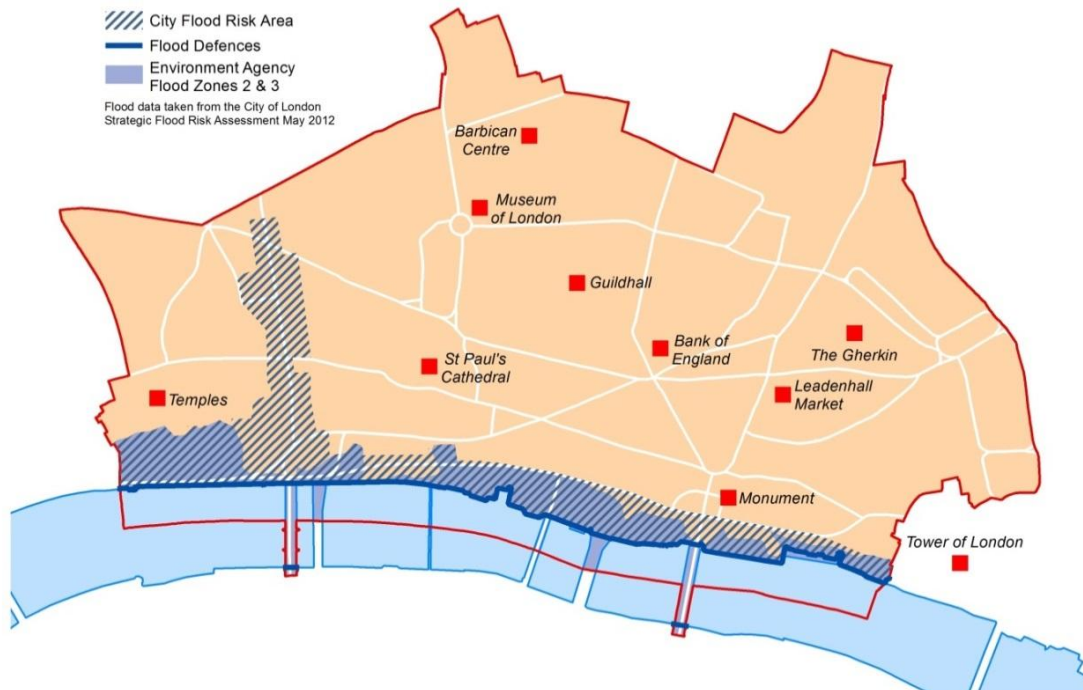
- 6.21 The City of London is at relatively low risk of flooding, with limited areas at risk from river flooding and surface water/sewer flooding during periods of heavy rainfall. Groundwater flooding is also a consideration in some parts of the City. Climate change is altering the flood risk from the tidal River Thames due to sea level rise and from surface water/sewer flooding due to changing rainfall patterns. The City of London Strategic Flood Risk Assessment provides details of flood risks from all sources, modelling the impacts of climate change on the various flooding risks.
- 6.22 The Local Plan ensures that vulnerable land uses, such as basement dwellings or premises requiring hazardous substance consent are not located in areas at risk of flooding. This approach, which reflects national policy, will be carried forward into the new Local Plan.
- 6.23 The existing policy requires the enhancement and protection of flood defences along the City's riverside. These flood defences will need to be raised by up to 0.5m by 2065 and 1m by 2100<sup>4</sup> to accommodate raised river levels as a result of climate change. This flood defence raising will benefit properties and public realm south of Thames Street along the riverside. Funding of flood defence improvements could be secured in association with development on the riverside, or through the Community Infrastructure Levy on development throughout the City.
- 6.24 Extreme weather events, which are becoming more frequent, have the potential to cause surface water flooding. The City is also vulnerable to sewer overflows as a result of intense rainfall across a wide area of north and west London entering the combined sewer network. The Thames Tideway Tunnel project is designed to tackle such overflows, but the installation of sustainable drainage systems (SuDS) will also help slow the rate of flow of rainwater into the sewer system. Policy will need to be updated to take account of national requirements for SuDS and drainage plans to be submitted with all major planning applications. This could be extended to cover smaller schemes which have a cumulative impact on rainwater run off to the sewers.

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<sup>4</sup> Thames Estuary 2100 Plan Nov 2014

- 6.25 The City Flood Risk Area is where properties are at risk of being flooded either from the river or surface water. Since it is impossible to completely remove the flooding risk, it is prudent to design flood resistance and resilience measures into buildings in these areas. Policy could require developers to provide evidence that their buildings will be resilient in the event of flooding or it could be left to building owners and insurers to manage such risk.

**Figure 12: City flood risk area**



### Flood Risk: Questions

#### **Question 6.14**

Should national SuDS standards continue to be applied to major development only or should we require smaller development to incorporate a certain standard of SuDS? If so, what type of smaller developments should be included?

#### **Question 6.15**

Should we require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area? If so what measures should be specified?

## Section Seven: City Communities

### Open Spaces and Recreation

#### Overview of issue

- 7.1 The City is densely built-up and has limited open space provision, most of which consists of small spaces that are dotted throughout the Square Mile. This open space is under increasing pressure due to further office development, an expanding workforce and growing visitor numbers. Further growth in office floorspace and employment over the next 20 years will add to this pressure. Large office developments offer the potential to create new spaces within buildings which are accessible to workers and/or the public. These spaces could include sky gardens, sports facilities, food growing opportunities, green walls and leisure planting, catering facilities and wildlife protection. Providing such spaces would help relieve the pressure on ground level open spaces and facilities.
- 7.2 Many open spaces in the City are of historic value (such as churchyards) while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs. There is a need for additional open space in the City to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquility, agile working, leisure and sport, and to increase biodiversity. The provision of greenery such as grass and trees can help to create an attractive environment for residents, workers and visitors, but this has to be balanced against the fact that spaces with harder surface materials are easier to maintain and are useable throughout the year.



## Open Spaces and Recreation: Questions

### Question 7.1

Should we continue to protect or enhance the existing open spaces in the City? How can we deliver more open space in the City?

### Question 7.2

Should priority be given to greenery within open spaces or to harder surfaces that are easier to maintain? Should developers be required to contribute towards the future maintenance of new open spaces?

### Question 7.3

Should we require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, including roofspace?

### Question 7.4

What type of outdoor open spaces and recreation facilities are most needed in the City? Should we specify what should be sought in new open spaces in terms of seating, planting and other facilities, depending on their location and character?

## Retailing

### Overview of issue

7.3 The Local Plan identifies 5 Principal Shopping Centres (PSCs) at Moorgate, Liverpool Street, Leadenhall Market, Fleet Street and Cheapside. These are also recognised in the London Plan as 'CAZ Frontages' lying within the Central Activities Zone. The Local Plan sets out a sequential approach to new retail development, requiring developers to look for sites firstly within the PSCs, then for sites on the edge of the PSCs or in the Retail Links, and only then to consider sites elsewhere in the City. Within the PSCs priority is given to shop (A1)<sup>5</sup> uses.



**Figure 13: Principal Shopping Centres and Retail Links**

<sup>5</sup> The Town and Country Planning Act classifies land and buildings into different categories, retail use is separated into five different classes, as described below;

A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.

A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies.

A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.

A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).

A5 Hot food takeaways - For the sale of hot food for consumption off the premises.

- 7.4 There is considerable variation in the character of each PSC; Cheapside has the look and feel of a high street, including a shopping centre with international stores and brands. Other PSCs, such as Fleet Street and Leadenhall Market have different characters and these areas may not be suited to the same policy approaches. There are many areas of the City that have large retail offers which are not currently identified as PSCs, most notably in Eastcheap, Ludgate and Holborn.
- 7.5 The purpose of the Retail Links is to encourage movement between the PSCs by improving the retail offer along these routes. In practice this may not be how people shop and retail uses have spread throughout much of the City in response to market demand and the desire from developers to have a mix of commercial uses in new buildings. Current Local Plan policy protects isolated and small groups of retail units that form an active retail frontage, unless it is demonstrated that they are no longer needed.
- 7.6 Retailing in the City includes many daytime, convenience uses such as sandwich bars and coffee shops that cater for workers daily needs. This offers a limited appeal to weekend shoppers, or visitors, who may have different needs. Although the Local Plan encourages 7 day a week trading, this is not widespread, with many retail units closed at weekends. Having temporary street markets could increase the variety of retail within the City of London as well as adding interest at weekends, but could cause conflict with retailers who see them as unfair competition.
- 7.7 The nature of how people shop is changing, with more online shopping, greater use of retail outlets for collection of goods ordered online and a blurring of the distinctions between different retail uses. The City hasn't seen many vacant retail units but as online retailing continues to grow, there could be lower demand for retail stores in the future, especially for units providing comparison rather than convenience goods. The Local Plan review will need to consider whether A1 shop uses should continue to be prioritised within the PSCs, and the criteria against which proposals for the loss of A1 units in PSCs will be assessed.

**Retailing: Questions**

**Question 7.5**

Should the number or role of PSCs be modified and/or should the boundaries of existing PSCs be amended? Is it still an appropriate policy objective to prioritise A1 units over other retail uses in PSCs?

**Question 7.6**

Do the retail links still serve a clear purpose or should we allow retail uses throughout the City? Should isolated retail units continue to be protected?

### Housing

#### Overview of issue

- 7.8 The City has a small but growing permanent residential population of approximately 8,000, which is proportionally more elderly than elsewhere in central London. There are also an estimated 1,400 second home owners. Most residential units are concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street), along with some smaller areas identified in the Local Plan. There are a smaller number of units scattered around the City.
- 7.9 The Local Plan makes provision for a minimum annual requirement of 110 additional residential units up to 2026, but the London Plan now requires the City to provide an additional 141 units on average each year. Our monitoring of housing land supply in the City shows this is an achievable target over the next 10 years without compromising the primary business function of the City. In the longer term, the capacity of the City to accommodate new housing may reduce. The City Corporation has commissioned a Strategic Housing Market Assessment to consider future housing needs. This suggests that there is an annual need for 125 residential units a year. We will need to consider how to reconcile this need with the requirement in the London Plan when setting a new target in the Local Plan.
- 7.10 Due to the size and character of the City, new housing has come forward on mainly small sites through redevelopment or conversion of existing buildings, without the need to allocate sites in the Local Plan. Residential development is encouraged to locate in or near existing residential clusters, where reasonable residential amenity consistent with a city centre location can be achieved. This approach has proved to be relatively successful in reducing disturbance to residents within the housing clusters and avoiding potential conflict with commercial uses. Dwellings outside these clusters can suffer from more noise nuisance from a variety of sources including pubs and clubs, evening servicing and deliveries. The residential clusters are shown indicatively rather than with specific boundaries in the Local Plan.
- 7.11 The severe housing shortage across London and the increasingly crowded transport network has meant that new forms of housing tenure are being explored and developed, such as institutional investment in private rented housing and rental units with communal working and services in the same building. Housing to

meet the needs of the City's growing elderly population needs to be considered, as well as hostel accommodation and student housing.

- 7.12 The City of London is an expensive part of London in which to live. The current Local Plan requires 30% of new housing to be affordable and provided on-site. Exceptionally, off-site provision or commuted payments may be acceptable, based on the equivalent of 60% of the proposed development. In practice, given high land and development costs in the City, commuted sum payments have been accepted from both residential and commercial development to fund the provision of a greater number of affordable houses on sites elsewhere in London, including on City Corporation-owned housing estates.
- 7.13 Government housing and planning policy enables a range of types of affordable housing including social rented, private rented, shared ownership, low-cost market housing and affordable rented accommodation. The Housing and Planning Act 2016 contains a new duty on local planning authorities to promote the supply of 'starter homes' and amends the definition of affordable housing to include these homes. Detailed regulations setting out how starter homes will be delivered have not yet been published, but draft regulations suggest that the Government will require 20% of new housing to be starter homes. This is likely to significantly restrict the ability to deliver other forms of affordable housing on sites in the City, or through commuted payments. In preparing the Local Plan, we will need to consider what level of affordable housing would be viable and whether the total affordable housing requirement should be increased to reflect the impact of starter homes.
- 7.14 The Housing and Planning Act 2016 introduces 'permission in principle' (PIP) for housing-led development on land that is allocated for such development in a local plan, a neighbourhood plan or on a 'brownfield register' of land suitable for housing. The intention of this change is to provide greater certainty about the development potential of residential sites, as once a PIP is established only technical details would need to be approved rather than a full planning application.

**Housing: Questions**

**Question 7.7**

Should we define the boundaries of existing residential areas more clearly to indicate where in the City further residential development would be permitted? Or, should residential development be permitted anywhere in the City as long as the particular site is not considered suitable for office use and residential amenity consistent with a city centre location can be achieved?

**Question 7.8**

Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?

**Question 7.9**

Is it feasible in the City for residential units to be successfully incorporated in a building with non-residential uses? Or would co-existence undermine the operation of City businesses and/or residential amenity?

**Question 7.10**

Are there types of housing to suit specific needs that we should encourage in the City e.g sheltered housing for the elderly or new forms of rental accommodation?

**Question 7.11**

Should the level of affordable housing required in the City be increased to allow the supply of rented affordable housing to be retained alongside starter homes? Is the approach to seeking commuted sums and delivering affordable housing acceptable?

**Question 7.12**

Are there any areas of land in the City that should be considered suitable for 'permission in principle' for housing-led development through the Local Plan review?

### Social and Community Infrastructure

#### Overview of issue

- 7.15 The way social and community services are funded and delivered is changing to adapt to the needs of an ageing population, the changing burden of disease, and rising patient and public expectations. Public funding for health and social care is under pressure and this is likely to continue. However, the working population of the City will increase over the period of the new Local Plan and this will increase the demand for services such as health and wellbeing clinics, dentists, physiotherapists, mental health facilities, and counselling. Workers are now able to register at GP surgeries near their place of work, which may also add to demand for these services in and around the City.
- 7.16 The City's permanent resident population is currently projected to increase to 10,400 by 2036, a 26% increase from 2016, with increases in the proportion of both children and the elderly. There will be an increased need for health services, educational facilities, childcare and sheltered accommodation. Some existing facilities, such as libraries, may need to adapt the services they provide in order to remain relevant to the local community.
- 7.17 The City is an intensely built up area, surrounded by boroughs with large residential communities. There may be instances where it would be a more efficient use of resources to locate a social or community facility outside the City and share it with residents in neighbouring local authorities. For example the City Corporation is jointly facilitating a health centre in Tower Hamlets which will be used both by residents in the City and Tower Hamlets. The City Corporation is also working with Islington to deliver a new primary academy just outside the City's boundary. Other options include locating health services in pharmacies.



**Social and Community Infrastructure: Questions**

**Question 7.13**

What type of facilities and services would be appropriate to meet the needs of current and future City workers? Are these different to the facilities needed by residents? How can facilities for workers and residents be best delivered?

**Question 7.14**

Should we plan to meet the need for social and community services in full within the City, or work with partners in neighbouring boroughs?