



Local Plan Review Issues and Options Consultation Statement

March 2017

Introduction

Public consultation on the City of London Local Plan Issues and Options took place over an initial six week period from 19th September to 31st October 2016, which was extended until 2nd December 2016. A small number of representations were also accepted after 2nd December 2016.

The comments received will be used to inform the drafting of detailed policies for further consultation in autumn 2017.

This Consultation Statement explains the background to this consultation exercise and how the consultation was carried out. It also contains a summary of the comments received under each of the questions in the Issues and Options document.

Statement of Community Involvement

The Statement of Community Involvement (SCI), which was adopted in July 2016, sets out measures for consulting the public on planning policies and planning applications in the City of London. Consultation on the Issues and Options for the Local Plan has been undertaken in accordance with the provisions of the SCI.

The Development Plan

The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. It is accompanied by a Policies Map, in two parts, which shows where its policies apply to specific locations. The Local Plan has to be consistent with national policy and in general conformity with the London Plan, prepared by the Mayor of London.

The current City Local Plan was adopted in January 2015 and plans for development requirements up to 2026. The decision to carry out a full review of the adopted Local Plan was made by the Planning and Transportation Committee in October 2015. At the time of adoption, it was recognised that an early review would be necessary to take into account the Further Alterations to the London Plan and other new policy developments arising from Government initiatives. The review will look forward to 2036 in line with the timescale of the current London Plan.

During 2016 the City Corporation's Local Plans Sub Committee met twice to steer emerging work on the review of the Local Plan. At its first meeting in March, the Sub Committee considered a report outlining some of the key planning issues for the City of London over the next 20 years. The purpose of that meeting was to help determine the scope and policy direction of the next Local Plan at a formative stage.

At its second meeting on 17th June, the Sub Committee gave detailed consideration to a draft Issues and Options document. The Sub Committee suggested changes to a number of the consultation questions as well as to the supporting text. A revised Issues and Options document was then considered by the Planning & Transportation Committee on 26th July 2016, which approved the document and proposals for public consultation.

Consultation on Issues and Options

The Issues and Options stage is the first stage in developing the new Local Plan, to be called City Plan 2036.

The SCI states that the objective at this stage is to assist the City Corporation in the identification of issues which the Local Plan needs to include, and to discuss possible alternative policies and proposals to address these. It adds that another purpose of the consultation is to ensure that communities' views are considered at an early stage in the plan making process and to build and develop on-going community involvement.

The City Corporation published the Issues and Options in the form of a discussion document, which identified key planning issues facing the City and posed a number of questions regarding its future development. The consultation questions were phrased in an open style, rather than setting out a specific list of options. This was done to encourage debate and not preclude respondents from coming up with their own ideas and suggestions.

By enabling a wide range of views to be expressed, it was hoped this would highlight where further research may be required and minimise the risk of unexpected issues emerging at a later stage in the process.

Consultation measures

Consultation on the Issues and Options began on 19th September and closed on 2nd December 2016. A range of measures were used to engage the public and stakeholders, based on those set out in the SCI.

The SCI identifies a number of bodies that need to be consulted. These include "specific" consultation bodies (comprising various statutory authorities) and "general" consultation bodies. The general bodies include a large number of organisations with an interest in City planning, including business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations.

The City Corporation also maintains a database of individuals and organisations interested in planning policies. As well as the specific and general consultation bodies, this list includes those who have previously responded to consultation on other planning documents, including the adopted Local Plan.

Over 1,350 emails and letters were sent to consultees on the planning policy database, with a separate email sent to 3,300 business occupiers. In addition letters were sent to all properties in the City which are registered as residential for council tax purposes, over 6,200 in total.

These letters and emails advised recipients of the consultation and invited comments. They also explained where the consultation documents and other information were available to view.

A range of other methods were used to publicise the consultation, which are summarised below:

Website: The City Corporation's website contained extensive information on the consultation. A City Plan 2036 webpage was created, which included the Issues & Options document, a comment form and an online questionnaire. It was also explained where printed versions of these documents could be obtained. The consultation was also publicised on the City Corporation's Intranet pages, promoting it to all staff members.

City Libraries: During the consultation period the Issues & Options document and other supporting documents were made available at the Guildhall and the City's public libraries:

Department of Built Environment Enquiries Desk, Guildhall	<i>Monday-Friday 9:15am-4:30pm</i>
Guildhall Library and City Business Library Aldermanbury EC2V 7HH	<i>Monday, Tuesday, Thursday, Friday 9:30am-5pm Wednesday 9:30am-7:30pm Saturday 9:30am-5pm (on selected Saturdays only)</i>
Artizan Street Library and Community Centre 1 Artizan Street London E1 7AF	<i>Monday 8am-7pm Tuesday-Friday 8am-4pm</i>
Shoe Lane Library Little Hill House Little New Street London EC4A 3JR	<i>Monday, Wednesday-Friday 9.30am- 5.30pm Tuesday 9.30am-6.30pm</i>
Barbican Library Silk Street London EC2Y 8DS	<i>Monday, Wednesday 9.30am-5.30pm Tuesday, Thursday 9.30am-7.30pm Friday 9.30am-2pm Saturday 9.30am-4pm</i>

Eshot: The City Corporation issues an *eshot* to inform the subscribers of news and current issues. The *eshot*'s subscribers include businesses and employees. A message publicising the consultation was published and issued via the City Surveyor's Department to 200 business occupiers.

City Resident: This is published three times a year and contains news about the community, environment, events and the latest updates from City Police. An article regarding the consultation was published in the autumn 2016 issue.

Business Representation Groups: Direct contact was made with specific business groups and interests to alert them to the consultation and it was requested that consultation notifications were circulated to their members.

This included the City Property Association, Cheapside BID, Aldgate Partnership, Inner and Middle Temple Associations.

Member Notification: Direct notification of the consultation was sent to all Common Council Members by letter and email and an article appeared in the September Members' Briefing. An additional briefing meeting for Members was held in October.

News coverage: A press release was published which gained wide publicity in the local, professional planning and property press. City Matters, a local paper for the City of London, featured the consultation on the front page of their maiden edition. There were also pieces in Planning Magazine and Property Week.

Facebook: A post regarding the consultation was made to the "City of London Corporation: City View" Facebook account on 20th September 2016. The account is "Liked" or "Followed" by around 13,000 different Facebook users.

Twitter: Posts were made about the consultation on the 19th September and 26th October from the @squarehighways Twitter account, which has around 3,000 followers. Posts regarding the consultation were also made from third party Twitter accounts, such as @tfltp, a TFL account about Taxis and Private Hire vehicles, which has over 11,000 followers and @PWnews, the Property Week account, which has over 60,000 followers.

Leaflets: A leaflet was produced to publicise the consultation. 1,500 copies of the leaflet were printed and distributed around the City. These were placed in key locations to target workers, residents and visitors. These included housing estate offices, libraries, churches, office foyers, and medical buildings.

Events and meetings

Officers of the Department of the Built Environment attended the following meetings to explain the consultation, promote discussion and receive comments:

Public Consultation Events: Two events were held at the City Centre on 3rd and 13th October 2016, to help publicise the consultation. These events were open to the public and involved a presentation, question and answer session and information displays. The first event took place in the late afternoon/early evening, while the second was held in the morning to potentially reach different audiences.

Officers also manned a stand at the launch of the Barbican Low Emission Neighbourhood on 11th January 2017.

Health and Wellbeing Board: This is a forum where key leaders from the health and care system work together to improve the health and wellbeing of the local population and reduce health inequalities. A presentation was given on 13th June 2016 to the Board, which covered the aims of the consultation, content and how to respond.

Conservation Area Advisory Committee: The CAAC was set up to advise the City Corporation on planning proposals and policies relating to conservation areas. A presentation was made to the Committee at its meeting on 29th September 2016.

Department of the Built Environment Users' Panel: The Panel was established to represent users of the service provided by the Department. Users Panel members were briefed on the Issues and Options consultation at their meeting on 13th July 2016.

Access Group: The group was established to advise the City Corporation on access issues. A discussion was held with, and an email sent to, the Head of Access on 20th September 2016, explaining the aim and content of the Issues and Options consultation and how responses could be made.

Comments received

A total of 911 comments in response to the Issues and Options consultation were received from 65 individuals and organisations.

Appendix 1 lists those who responded to the Issues and Options consultation.

Appendix 2 summarises the comments in the same order as the questions in the document. Copies of the full comments are available for inspection at the Guildhall on request.

Appendix 3 summarises the comments received at the public consultation events at the City Centre, as well as at the launch of the Barbican Low Emission Neighbourhood.

The comments received will all be considered and taken into account in preparing the Draft Local Plan.

Integrated Impact Assessment (IIA)

Production of the Local Plan will be supported by the production of 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; and
- Health Impact Assessment.

The IIA will be an integral part of the plan making process and will help to inform the development of detailed policies. As part of the Issues & Options consultation, the IIA Scoping Report and Commentary Document were published for information and comment.

Comments were received from two statutory consultees, the Environment Agency and Historic England. The City Corporation's response to these comments is recorded in Appendix 4 and will be reflected in the next iteration of the IIA at Draft City Plan 2036 stage.

Evidence base

Preparation of the City Plan 2036 will be informed by a range of data and research, some prepared by or on behalf of the City Corporation and some by other organisations such as the Mayor of London.

A supporting evidence document was produced to accompany the Issues and Options consultation document. This evidence paper contained a range of facts and figures about land use and development trends in the City, which were intended to provide useful background information for people responding to the consultation. The consultation was also supported by evidence studies undertaken by the City Corporation to inform the development of the Local Plan.

The City Corporation will also commission additional studies to inform the policies in the new Local Plan. This process has started and two studies that had been completed were published at the same time as the Issues and Options consultation.

The following documents were available to view at the Guildhall and were published on the City Plan 2036 webpage.

- Issues and Options Evidence Summary
- Strategic Housing Market Assessment (June 2016)
- Strategic Housing Market Assessment Addendum (September 2016)
- Waste Arisings and Waste Management Capacity Study review 2016

Appendix 1 – list of respondents to the Issues and Options consultation

Anonymous (email address provided)
Barbican Association
Bennett, Peter
Berkeley Homes
Bickerton, Jane
British Sign & Graphics Association
Cadavez, Rita
Chancery Lane Association
Chapter of the Cathedral of St Paul in London
City of London Archaeological Trust
City Property Association
City Public Realm, CoL
Coleman, David
Conservation Area Advisory Committee
Cornish, Adam
de Wit, Ivo
Environment Agency
Fletcher, Charlotte
G, Trevor
Garner, Harold
Greater London Authority
Hayden, M
Hilburn, Heather
Historic England
Historic Royal Palaces
Jones, Gregory QC
Khan, Mohammed
Laake, Jean-Pierre
Lee-French, Segun
London Borough of Bexley
London Borough of Hackney
London Borough of Islington
London Borough of Tower-Hamlets
Linden & Co (Antiques) Ltd
London Cycling Campaign
Martinelli, Paul
Merchant Land Investment Ltd
Merlen
Meyringer, Fiona
Museum of London
Northern & Shell
North London Waste Plan
O'Dowd, William
Port of London Authority
Railwatch
Rees, David
Rentplus
Rogers, Fred

Ronish, Yarema
Rose, Peter
Royal Borough of Kensington and Chelsea
Slough Borough Council
Streeter, Patrick
Team London Bridge
Theatres Trust
Thurrock Borough Council
Transport for London
Transport for London Taxi and Private Hire
Transport for London Property
Travis Perkins PLC
Whitby, Jonathan
Whitehead, John
Whitlock, Richard
Ziv, Amiel

Appendix 2 - Issues and Options Consultation Responses Summary

General Comments on the Whole Plan

Number of comments: 13

- Three respondents referred to the potential impacts of Brexit and the uncertainty that this has generated for future planning.
- The GLA recognised the unique role of the City of London and highlighted the critical relationships between central London activities and adjoining boroughs.
- Joint working was suggested on a number of issues, including any potential expansion of the Central Activities Zone (CAZ) and the introduction of an Article 4 Direction to extend the CAZ exemption from residential permitted development rights beyond May 2019.
- Two respondents suggested that the Local Plan should include a Special Policy Area to protect the Silver Vaults in Chancery Lane.
- Historic England highlighted the importance of developing a robust evidence base which demonstrates clearly an understanding of the City's historic environment, the significance of its heritage assets and their contribution to the wider environment.
- The Chapter of St Paul's Cathedral expressed an interest in policy development in the area of spirituality, wellbeing, social cohesion, diversity and equality.

Strategic Objectives

Question 2.1

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

Number of comments: 21

- There were a wide range of views on the key challenges for the Local Plan review, with no particularly dominant theme emerging.
- Six respondents mentioned Brexit, suggesting that the Local Plan needs to provide a flexible and supportive policy approach towards future commercial office demands in order to maintain the City's competitiveness.
- Six respondents highlighted traffic congestion and related impacts, including road safety concerns, impacts on more vulnerable road users, and traffic pinch-points.
- Five respondents highlighted tackling pollution, particularly poor air quality.
- Four respondents stated that the City needs to play its part in addressing London's housing shortage, including local affordable housing need and accommodation for young City professionals.
- Three respondents referred to overcrowding, pedestrian capacity and the need to widen pavements.
- Three respondents highlighted the importance of the delivery of high quality public realm and making effective use of the City's limited open spaces/green infrastructure.

- A range of other challenges were identified including tall buildings and further development of the Eastern Cluster; protecting the setting of internationally significant heritage assets; the delivery of IT infrastructure; protection of amenity in residential wards; changing work patterns; better wayfinding and promotion of the City to visitors; capitalising on the development opportunities presented by Crossrail; minimising flood risk; and providing better linkages with surrounding areas.

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?

Number of comments: 11

- This question prompted a mix of views with no dominant themes emerging.
- Two respondents highlighted that the quality of the City's built environment is critical to its future competitiveness, and that the City should lead in providing an environment which delivers for all users. Specific suggestions included allowing flexible use of street level spaces; promoting tall buildings which can provide increased office space, but also more public realm by having smaller footprints; greater integration of the City's buildings with its heritage; and encouraging infrastructure improvements.
- The City Property Association (CPA) commented that the Plan needs to be sufficiently flexible to allow the competing demands of policy to be achieved whilst allowing high-quality, sustainable development, but at the same time needs to avoid ambiguity.

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?

Number of comments: 23

- A clear majority of respondents (18) felt that the existing strategic objectives remain relevant, although some qualified this by suggesting amendments or additions to the current wording.
- Specific suggestions for additional objectives, or for issues that should be given greater prominence, included:
 - The GLA suggested a new objective focused on spreading the benefits of the City's investment and growth to all Londoners;
 - A new objective that the City remain internationally competitive as a business location in terms of its relative cost and quality;
 - A new objective to improve the quality of life for City residents, addressing health and wellbeing, including spiritual wellbeing;

- Greater prominence to public realm, open spaces and the pedestrian environment;
- A more proactive approach to the historic environment;
- Addition of references to the River Thames and the Cultural Hub.

Key Diagram

Number of comments: 3

- A small number of respondents made comments relating to the Key Diagram from the adopted Local Plan.
- Historic Royal Palaces would like to see the Eastcheap Retail Link extended to the Tower of London, and a visitor route identified between the Monument and the Tower.
- The Port of London Authority asked for the new location of Blackfriars Millennium Pier to be identified.
- The Conservation Area Advisory Committee (CAAC) agreed with the intensification area at Farringdon, but noted that protected views may make the area of intensification difficult to achieve.

A World Financial and Business Centre

General Comments:

Number of comments: 5

- General comments raised included:
 - More emphasis is needed on public realm and street activity.
 - Newer sectors such as technology firms may want more than just corporate office space.
 - There needs to be a close relationship between the City and the City Fringe.
 - The potential for a policy on affordable space for SMEs should be considered.
 - A balanced approach is needed between office development and complementary land uses to ensure continued job growth.
 - The Plan should avoid being overly rigid or restrictive, with the market best placed to determine the format of future office provision.

Offices

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?

Number of comments: 23

- Eight respondents, including the GLA, supported the concept of a “commercial core”. The GLA asked for the core area to be more clearly defined.
- Four respondents were opposed to identification of a “commercial core”: as it would not be sufficiently flexible to adapt to changing trends; it could disrupt the commercial mix currently found and adversely affect the City office market; and the whole of the City should be seen as commercial core.
- TfL highlighted the possibility that the CAZ will not have enough capacity for anticipated employment growth into the 2040’s, and that the benefits of the City’s public transport links and agglomeration of office uses should be maximised rather than losing key sites to housing and other non-office uses.
- Flexibility was considered important with nine respondents suggesting it was necessary within the City (either in combination or separate to designating a “commercial core”).
- There was limited support for ending the City’s current exemption from office to residential permitted development rights, with some contrasting support for an Article 4 Direction requiring planning permission for all changes of use in the City to account for the intense competition for land.
- A number of respondents referred specifically to the Riverside as an area that should be outside the “commercial core”. The Riverside would benefit from a mixed use approach, for example with cafés, restaurants and associated new public spaces.
- Six respondents stated that existing hotel and/or residential clusters should be outside any “commercial core”.
- The Barbican Association suggested that the City’s four residential wards should be outside a “commercial core”, while the Chancery Lane Association considered that residential use in this location would minimise office vacancies and add to the area’s vitality.

Question 3.2

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

Number of comments: 7

- Responses suggested that there needed to be greater flexibility in office floorspace, particularly allowing for the conversion of larger buildings to provide space suitable for SMEs. The Plan should also provide for affordable work space for SMEs.
- Alongside flexibility in the use of offices, respondents supported greater flexibility in lease terms for offices to enable easier adaptation to changing circumstances.
- Other comments considered there should be provision for live-work units in the City and a greater encouragement to joint working with the education sector.

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?

Number of comments: 6

- There was a mixed response to this question, with some support for moving away from floorspace targets to a more flexible, criteria based policy. There was also support for the retention of specific targets, albeit they need to take account of the greater density of occupation of space.
- The CPA, while supporting the retention of targets, acknowledged that we are entering a period of some uncertainty following the EU referendum result and that the Plan should provide sufficient flexibility in terms of office policies and associated viability matters.
- No-one specifically commented on the merits or otherwise of 5-year phasing.

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?

Number of comments: 9

- All respondents supported a more diversified employment base. Benefits cited included creating more vibrancy at weekends and providing more resilience against economic crises. The Plan should address growth in a number of sectors, particularly creative and tech sectors.
- Some respondents qualified this support with the observation that diversification should not be at the expense of losing the City's historic function as a global financial hub.
- The CPA suggested that flexibility is required to support SMEs' changing working patterns and emerging sectors, such as Fin Tech and the TMT sector. It would like to see the Plan being 'outward looking' in terms of its relationship with the adjoining boroughs.
- The GLA commented that policies to encourage a diverse range of employment uses would be welcomed, especially in areas which have potential to support specialisms and agglomerations outside the commercial core.

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?

Number of comments: 7

- Respondents were generally positive about protecting a range of office sizes and promoting space for SMEs, but highlighted the need to understand their requirements and to consider refurbishment before replacement in smaller developments.
- It was suggested that Section 106 Agreements could be used to deliver subsidised office accommodation, and that the City Corporation could offer subsidised rents as well as providing a range of office sizes and types within its own property holdings.
- The CAAC welcomed the provision of office space for SMEs, noting that SMEs were more likely to seek out sites in fringe areas where floorspace is less expensive.
- The area around Chancery Lane was identified as being appropriate for a mix of residential and smaller office units that could accommodate SMEs.

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?

Number of comments: 7

- All respondents agreed that there should be flexibility in the provision of office floorspace to respond to changing demands and working practices and to accommodate more diverse, smaller businesses.
- Three respondents, including the GLA, stated that there is likely to be a continuing need for some large floorplate occupiers in the City and that policy should facilitate a range of sizes and types of employment.
- The CPA felt that the planning system should not engage in determining floor plate sizes.

Utilities Infrastructure

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?

Number of comments: 9

- There was support for a more strategic and collaborative approach to infrastructure provision in order to ensure the City's resilience, including from the CPA.

- The GLA highlighted the importance of taking a long-term view of the needs of various utilities as well as measures to reduce the demands of new development on such infrastructure.
- It was suggested that specific reference be made to low emissions/green 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?

Number of comments: 11

- Respondents supported an objective to achieve full 4G coverage across the City. Various options for delivering digital connectivity were suggested, including:
 - Using street furniture to relay local Wi-Fi
 - Rolling out BT's LinkUK programme to the City.
- The CPA stressed that digital and telecommunications infrastructure must continue to be prioritised, to ensure the City is able to compete with other world cities.
- Historic Royal Palaces highlighted that provision of digital infrastructure needs to be handled sensitively and not have adverse effects on heritage assets.
- Ensuring that the utilities required for the Square Mile are delivered was highlighted as vital to the software needed at the Museum of London.

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?

Number of comments: 7

- Noise and pollution impacts from construction sites were a theme of four responses, including from the Barbican Association. Suggested actions included strict codes of conduct, full consultation with neighbours, tougher standards during construction, restrictions on noisy night-time working and greater use of off-site assembly
- More use should also be made of solar panels and low DC voltage internal systems to reduce demand on the mains electricity supply, while local composting networks should be considered for foul waste.

Safety and Security

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?

Number of comments: 16

- A key theme was the need for clear dispersal routes (10 responses).
- Provision of more night-time uses was suggested by four respondents, with areas of potential growth highlighted in the Farringdon/Barbican/St. Paul's area and on the north bank of the Thames.
- Four respondents recommended that there should be restrictions on entertainment uses and the size, number and concentration of bars, particularly in residential areas. However, there was also support for restrictions on night-time entertainment where it impacts on more dispersed residential properties.
- The Barbican Association suggested restrictions should apply in the residential wards, and the Chancery Lane Association identified Chancery Lane as unsuitable for the promotion of night time entertainment uses other than bar and restaurant uses subject to normal hours restrictions.
- Six respondents drew a distinction between different night-time uses, suggesting this should be addressed in the Plan.
- The GLA indicated there may be opportunities for offering an improved night-time economy in light of the City's good public transport and relatively low resident population.
- The need for a collaborative approach between planning, licensing, environmental health and policing was expressed by a number of respondents, as was the need for night toilet facilities near tube stations and licensed premises.

Question 3.11

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

Number of comments: 12

- Five respondents suggested that overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes would increase safety and security. Hostile vehicle mitigation should be permitted where there is a need and should be designed to complement the streetscape.
- Other measures mentioned included CCTV and well-designed public realm, and an area-wide approach..
- There was support from the GLA for the Local Plan to give detailed consideration to security.

Question 3.12

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

Number of comments: 12

- All respondents agreed that additional measures could be implemented to tackle crime and anti-social behaviour.
- Six responses highlighted the role of the design of public spaces and buildings in tackling crime and anti-social behaviour.
- Historic Royal Palaces highlighted public areas around the Tower of London where appropriate measures to address crime and anti-social behaviour would be welcomed.
- The Chapter of St Paul's Cathedral would welcome clearer design policies for the public realm, combined with active policing and management, to limit activities that can damage the environment such as skateboarding.
- Other measures identified included:
 - More cameras and stricter enforcement were suggested.
 - Provision of facilities for the homeless.

Key City Places**General comments**

Number of comments: 5

- All responses referred to the need to improve the Riverside Walk, with the PLA supporting measures to address current gaps on the Thames Path.
- Four respondents suggested measures to improve the appearance and pedestrian permeability of Lower Thames Street.

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?

Number of comments: 13

- Six respondents, including the GLA, the CPA and Historic England, supported the concept of place-based policies, with no-one suggesting they should be removed from the Local Plan.
- There was no firm view on whether the term Key City Places (KCPs) should be retained, or amended to Areas of Change
- Four respondents expressed concern that the KCPs are shown as 'vague blobs' and suggest defining precise boundaries on a map. However, the CPA, while supporting area based policies, felt that they need to be sufficiently flexible and

adaptable to be able to reflect and respond to emerging market and economic changes.

- Historic England expressed concern that the extent and justification of the current KCPs appear to be driven by the demand for development and its form, rather than by an evaluation of their historical development and resulting characteristics.

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.

Number of comments: 7

- Areas suggested by respondents that require a particular policy focus were:
 - The western part of the City (areas between Fleet Street, Chancery Lane, Holborn Viaduct/Holborn and Farringdon Road);
 - The area around St Paul's Cathedral;
 - The Chancery Lane area;
- The GLA stated that reference should also be made to the London Plan areas of change which lie close to the borders of the City, namely the City Fringe/Tech City Opportunity Area and the Farringdon/Smithfield Area for Intensification.
- The CPA mentioned the need for new and updated area policies for Smithfield/Cultural Hub; Liverpool Street/Broadgate; Aldgate; and Eastern Cluster.
- The Barbican Association suggested that the residential wards should be treated differently to the rest of the City, and given more protection from excessive development, evening and night time activity, noise and light pollution.

The North of the City/Cultural Hub

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?

Number of comments: 12

- Overall, eight respondents agreed that the North of the City KCP should be divided into two specific areas
- Four respondents thought the east and west of Moorgate are quite different in character and suggested that the area west of Moorgate should be part of a Cultural Hub KCP, while the area east of Moorgate is dominated by offices and no different from the main fabric of the City.
- The Museum of London noted that the Smithfield/Barbican area will be transformed by the Elizabeth Line, the new Museum and Beech Street and

commented that a particular focus on this area may be helpful in the years ahead.

- There was no firm view on whether Liverpool Street/Broadgate should be identified separately as a KCP, with one suggestion that it should be incorporated into the Eastern Cluster.

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?

Number of comments: 15

- Four respondents indicated that the key challenges to address are improving permeability; creating active frontages to new buildings; providing signage and wayfinding cues to assist visitors; and linking the Cultural Hub to Farringdon Station. Other suggestions included the widening of pavements; better designated cycleways; time separation of pedestrians and vehicles; and creating more pedestrian routes and providing more visitor accommodation.
- The CPA indicated that it fully supports the Cultural Hub initiative and the diversification of uses, where appropriate, to ensure the initiative is a success.
- The Barbican Association indicated that the Local Plan needs to consider the balance between the activities of the Cultural Hub and the residential area it sits within. It suggested limits on night time activities in open areas near residential flats.
- Beech Street should be a priority area for reduced traffic, increased pedestrian use and an improved environment, while an upgrade is required to the whole area around Barbican Underground station, including step-free access.

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?

- Five respondents supported promoting business intensification and flexible workspaces in the Liverpool Street/Broadgate area.
- The CPA highlighted the importance of the Liverpool Street/Broadgate KCP being sufficiently outward looking to ensure policies take advantage of the adjacent markets in other boroughs. The new Local Plan should increase support for the technology sector and other markets in the City Fringe, with support for this approach also expressed by neighbouring boroughs.

Cheapside and St Paul's

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?

Number of comments: 13

- Eight respondents felt that Cheapside and St Paul's should be retained as a KCP, reflecting its distinctive character as a result of the 7-day a week vibrancy created by One New Change. The potential for extending the area to include retail streets east of Royal exchange was mentioned..
- The Chapter of St Paul's Cathedral referred to the need for integration with the Cultural Hub and opportunities for reinforcing the identity and significance of St Paul's as one of the 'key spaces' in London.
- Three respondents felt that there is no need to retain a specific area based policy as most of the likely changes have already occurred or will do so shortly.
- The CPA commented that the highway proposals and associated change at Bank Junction could be covered by a specific transport policy on this topic, rather than a KCP policy.

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?

Number of comments: 9

- Most of the respondents commented that improvements are needed to draw visitors from Cheapside to the Cultural Hub. Suggestions included public art on St Martin's Le Grand and Greyfriars Church Garden; traffic reduction measures including road closures; and the provision of more independent stores.

Eastern Cluster

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?

Number of comments: 10

- This question produced no clear agreement, with half the respondents (5) being broadly supportive of further intensification within the Eastern Cluster and the other half expressing concerns about further intensification.
- Amongst those who were supportive, the CPA pointed to the transport upgrades coming forward at Bank Underground and Liverpool Street Station, while the

GLA highlighted the area's excellent public transport links as well as some under-used land and buildings and a relative lack of constraints compared to other areas.

- There was also support for a positive approach to tall buildings to add certainty for developers and tenants alike.
- Respondents who did not support further intensification cited concerns about the shortage of open spaces in the area and about whether the streets and public realm can cope with the increased number of people.
- Historic Royal Palaces was concerned about the continuing increase in height and scale of buildings within the Eastern Cluster and its impact in views of the Tower of London World Heritage Site (WHS) and the related gradual reduction in visual separation between the cluster and the WHS. HRP would oppose any infilling of the gap between the current cluster and 20 Fenchurch Street, and to the development of taller buildings in the Aldgate area which would lie within the protected vista of LVMF view 25A.1 from Queen's Walk.
- Historic England commented on the need to make publicly available 3D modelling of the Eastern Cluster in the interests of transparency, and also recommended greater clarity on the development and design parameters for future proposals.

Question 4.9

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

Number of comments: 6

- Infrastructure improvements that were suggested included:
 - safer streets for cyclists;
 - segregated infrastructure;
 - pedestrianisation;
 - increasing footway widths;
 - improved crossing facilities;
 - better freight handling;
 - alternative walking routes through development sites; and
 - improved travel demand management at peak times.

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 pedestrianizing streets in the Eastern Cluster and creating more open spaces through buildings? What routes through the Eastern Cluster should we improve?

Number of comments: 13

- All but one of the respondents agreed that emphasis should be placed on public realm improvements, and 11 out of 13 mentioned the need for new or improved pedestrian routes.

- Five respondents supported the public art programme in the Eastern Cluster and suggested the need for a specific public art policy.
- The GLA indicated that strengthening pedestrian connections east and into Tower Hamlets would be a positive strategic objective.
- TfL commented that special emphasis should be placed on measures to improve the capacity of the public realm to cope with increased pedestrian movements.
- The CPA supported opportunities for pedestrianisation or timed restrictions on traffic and also potentially opportunities for shared surfaces.
- Five respondents argued that pedestrian routes through buildings are only desirable if they are under a glazed roof and animated with retail, such as at Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space.

Aldgate

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?

Number of comments: 14

- No responses argued for the deletion of this KCP.
- Five respondents suggested a specific boundary for the Aldgate KCP, which would be slightly larger than the current area.
- Four respondents supported the idea of extending the Aldgate KCP to become an East of City area. The CPA commented that this extended KCP could draw on the Mayor's City Fringe SPG, where appropriate.
- Historic Royal Palaces expressed concern about any change to the designation or extension of the existing Aldgate area that might encourage new tall buildings in this area of high sensitivity in the backdrop to the Tower of London.
- In terms of the policy focus, suggestions included balancing community needs between residential, offices and visitors; promoting vibrancy and mixed uses; improving connectivity and sustainable transport; and street scene/public realm enhancements.

Question 4.12

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

Number of comments: 8

- The major concern was the impact of the night-time economy on residents, with the majority of respondents (5) wanting greater protection from nightclubs and bars.

Thames and the Riverside

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?

Number of comments: 15

- Eight respondents supported a wider mix of uses, to include cafes and restaurants; sports and recreational facilities; cultural venues; offices; hotels; residential; and outdoor public space, although a minority of respondents were concerned about the impact of change on the area's peace and tranquillity.
- Comparison with the South Bank was raised by several respondents,
- The CPA stated that it sees no immediate need for further or more prescriptive policies for this area, nor is there an overwhelming case for promoting one particular land use over any other.

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?

Number of comments: 13

- All of the responses supported greater use of the river for transport purposes.
- TfL and the Port of London Authority (PLA) were supportive of the potential use of the river for deliveries and servicing, while the GLA indicated that use for movement of demolition waste and construction materials should be considered.
- However, five respondents argued that use of the river for servicing should only be allowed where this does not interfere with pedestrian use of the Riverside Walk.
- Nine respondents specifically supported bringing unused piers back into operation, with several indicating that this would help reduce current congestion at Tower Pier.
- TfL and the PLA supported investigating the potential reinstatement of Swan Lane Pier, and both added that the City Corporation should also consider the possible reinstatement of Custom House Pier.

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?

Number of comments: 13

- This question prompted a difference of views. Seven respondents agreed with the question, identifying the openness of the river landscape as being a key feature of the City environment. However, five suggested a more flexible approach to development is needed, which would be consistent with creating a vibrant Riverside Walk, while securing the necessary flood defences and future maintenance of the river bank. .
- The Environment Agency stated that development on or over the river should be resisted, pointing out the benefits for amenity and biodiversity and the need for inspection, maintenance and improvement of flood defences. The Environment Agency would also like redeveloped buildings to be set further back from the river to enable future flood defence raising and more amenity space.

City Culture and Heritage

General comments

Number of comments: 7

- The majority of comments expressed general support for the City Corporation's positive approach to protecting the historic environment and the need for the City Corporation to do all it can to protect the historic environment.

Design

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?

Number of comments: 15

- Five respondents suggested that the City should adopt a more considered and coherent approach to the massing of buildings.
- There were different views on the policy approach to advertising. There was some support for the current restrained approach, but also a view that the existing policies are far too rigid, prescriptive and detailed.
- The CPA considered that the City's current design policies are working well and did not see any immediate need for significant revision.
- The Barbican Association requested the exclusion of the effects of balconies from daylight and sunlight calculations; called for planning conditions to restrict the use of roof terraces which overlook residential clusters after 7pm; and suggested limits on the use of plate glass windows to reduce light exposure and improve privacy.
- The Chapter of St Paul's Cathedral referred to development impacts such as daylight, wind, noise, pollution and pedestrian flows, and noted that impact assessments on planning applications sometimes fall short of expectations. The Chapter would welcome stronger guidance which ensures quantifiable standards are achieved.

Visitors, Arts and Culture

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?

Number of comments: 12

- The majority of respondents (8) supported hotel development in principle, with one opposed to any further hotels at all and one supporting the development of hostel type accommodation rather than hotels.
- New hotel development should be located near transport hubs or major visitor attractions, and large hotels should only be on sites which are suitable for taxi and coach drop-off and servicing.
- The GLA welcomed additional hotel accommodation in principle providing the other functions of the CAZ were not compromised. City fringe areas with good public transport access were suggested as best able to support this fine balance. However, a neighbouring borough highlighted that it has limited capacity for new hotels.
- The CPA indicated that hotels should be allowed where appropriate and where they support the overall mix of the City. Hotels could be encouraged in the Cultural Hub, but in general each site should be considered on its individual merits.
- Another respondent suggested that St Paul's and Farringdon/Barbican/Smithfield might be areas for consideration.

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?

Number of comments: 5

- There was no support for including a target within the Local Plan.
- The Barbican Association stated that hotel growth should be restricted to areas adjacent to St Paul's which would serve both the business City and the Cultural Hub.

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?

Number of comments: 12

- Five respondents argued that it would not be practical to prioritise hotel accommodation for business visitors because hotels trade seven days a week and cater for a mix of visitor types.
- There was some support for catering principally for tourists (2 responses) and some for prioritising business visitors (3 responses).
- Several respondents pointed out that the introduction of Crossrail and 24-hour tube services will enable easier access to the City for visitors from other parts of London.

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?

Number of comments: 18

- A majority of respondents (12) supported uses and activities which could attract more visitors, with several observing that the City Corporation's Visitor Strategy and Cultural Strategy already encourage more visitors and that the Local Plan should follow suit.
- Nine respondents expressed specific support for on-street activities, with a number saying this would bring more vitality to the City in the evenings and at weekends. Suggestions included appropriate seating; public art; wayfinding; public toilets; litter collection; street markets and catering uses along main tourist routes; 'changing places'; and facilities for people with disabilities.
- A minority of responses were opposed to on-street activities for reasons including disturbance to residents, poor air quality and congested roads.
- The need for a high-quality public realm at locations such as the Eastern Cluster and West Smithfield was mentioned.

Historic Environment

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?

Number of comments: 12

- This question prompted a range of comments with no overall consensus.
- There was some support for the protection of non-designated heritage assets through policy, but also a concern that such policies would not add value and that proposals should be dealt with on a case-by-case basis.
- Historic England welcomed the Corporation's commitment to developing a Historic Environment SPD, with clear policy hooks in the Local Plan to help

inform the management of all heritage assets and their settings. Historic England also suggested a policy that encourages heritage-led regeneration.

- The Barbican Association would like to see the Barbican and Golden Lane estates designated as conservation areas.

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?

Number of comments: 8

- It was noted that the proposed relocation of the Museum of London to Smithfield is a good example of reusing a heritage asset.
- The Barbican Association was concerned at the impact of oversized development on the Barbican and suggested that the Highwalks could be extended to increase pedestrian safety.

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?

Number of comments: 11

- Seven respondents, including HRP and Historic England supported the inclusion of a specific policy protecting the Tower of London World Heritage Site (WHS).
- Three respondents felt there was no need for a specific policy as existing policies combined with WHS designation should be sufficient to protect the setting of the Tower.

Protected Views

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?

Number of comments: 13

- There was widespread support for retention of the current Local Plan approach to view protection.
- Historic England suggested that additional policy consideration be given to views from within conservation areas and HRP requested that updated guidance on the Tower of London be taken into consideration.
- The Chapter of St Paul's Cathedral indicated support for current view protection, but also drew attention to recent publicity that had identified shortcomings with the protection afforded by the London Views Management Framework.

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?

Number of comments: 9

- All but one of the responses felt that view protection policies helped protect the City's character and 'uniqueness' and allow for better orientation around the City.
- The CPA suggested that any review of local view protection should be undertaken as part of the Mayor's review of the London View Management Framework.
- Historic Royal Palaces expressed concern about any reduction of current view protection policies which could increase the impact of major development on the setting of the Tower of London WHS.

Question 5.11

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

Number of comments: 7

- Five respondents supported in principle the protection of new views, while two respondents were against. Locations suggested for new views were from the Sky Garden at 20 Fenchurch Street or the view of St Pauls from One New Change.

Tall Buildings**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?

Number of comments: 26

- This question prompted an even split of opinions. 11 respondents were broadly supportive of further tall buildings in the City, while 11 either raised concerns or called for no more tall buildings to be permitted.
- Nine responses specifically supported the continued clustering of tall buildings, although there were some critical comments about the design quality of the Eastern Cluster and recognition that concentrating the densest development is likely to put more strain on local infrastructure including transport and public realm.

- A number of respondents were concerned about the impact of tall buildings on City churches or other listed buildings, as well as open spaces, in terms of overshadowing or loss of character.
- The GLA supported the City's approach providing it is backed by clear locational guidance and robust policy to secure high quality design.
- The CPA argued that high density development in tall buildings represents a sustainable form of development where they form clusters. The CPA added that policy should not preclude tall buildings outside the Eastern Cluster.
- The Barbican Association commented that continued development of tall buildings seems inevitable given the constraints on space, but called for clusters of tall buildings to be precluded around residential areas.
- Historic Royal Palaces reiterated concerns about any potential expansion of tall buildings, particularly in the area around Aldgate.
- The Chapter of St Paul's Cathedral expressed concern that if the primary Eastern Cluster were to extend well beyond the original boundary, this would be detrimental to the general character of the City, not just the wider setting of St Paul's.
- Three neighbouring boroughs responded to this question. Tower Hamlets expressed concerns about the potential impact of the intensification of the Eastern Cluster on the Artillery Passage Conservation Area and the Tower of London. Hackney expressed a desire to work with the City with regard to the development of tall buildings in the vicinity of Liverpool Street, and Islington commented that future proposals are likely to be more appropriate where they correlate with existing clusters.
- Liverpool Street was mentioned in a couple of responses as an area which could be suitable for more tall buildings.

Question 5.13

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

Number of comments: 15

- The majority of respondents agreed that the impacts mentioned in the question were important, but a range of factors were raised:
 - Five respondents considered that new tall buildings should be required to provide well designed, publicly accessible, open spaces
 - Several respondents suggested that special regard should be paid to heritage assets and their setting.
 - Other factors that were mentioned included solar reflection/glare, daylight/sunlight impacts and the need for building protection measures to be fully integrated into the fabric of the building.
- The Chapter of St Paul's Cathedral encouraged the use of visualisation tools to gain a better understanding of the development capacity of the tall buildings cluster, so that the impacts of change can be assessed and proposed change is evidence-based.

- The Environment Agency considered it important to have regard to the proximity of tall buildings to the River Thames and any impacts on the integrity of existing flood defences or the shading of the foreshore.

Question 5.14

Should the Local Plan include a reference to the CAA's London Tall Building Policy and its intention to object to proposals exceeding 305m AOD in order to give more comprehensive policy guidance in the Local Plan?

Number of comments: 13

- The majority of respondents (10) agreed that a reference should be added into the Local Plan to provide more comprehensive policy guidance.

Environmental Sustainability

General comments

Number of comments: 15

- Around half of these general comments focus on transport related issues.
- Reducing noise, light and air pollution and improving conditions for walking and cycling were supported.
- TfL commented that this section had little mention of public transport and particularly buses and the Local Plan should recognise the important role of buses within the hierarchy of transport in the City and set out a vision for their future role.
- TfL also requested that dedicated taxi ranks should be accommodated in new development.
- The Museum of London noted the importance of planning effectively for deliveries and coach visitors, alongside public transport and cycle parking.
- Historic England commented that climate change measures should be balanced against the need to preserve and enhance the historic environment.

Sustainability and Climate Change

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?

Number of comments: 10

- The majority of respondents (9) supported positive planning to enable a more sustainable, low carbon future City.

- There was specific support for district heating and smart grid technologies. Other technologies which were mentioned included green infrastructure, solar energy, high tech insulation, recycling, sustainable transport, low energy lighting and air source heat pumps.

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?

Number of comments: 8

- The majority of respondents (7) were in favour of climate resilience measures. A range of measures were identified including sustainable drainage systems (SuDS), management of water use and rainwater run-off, green infrastructure, green roofs and walls and measures to avoid the creation of wind tunnels.
- Respondents suggested that resilience must extend to cover transport, ICT and public realm as well as buildings. Refurbishment of buildings was noted as being more sustainable than demolition and rebuild.
- The GLA commented that temperature control in glazed and tall buildings is an issue which merits attention in the Local Plan.

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?

Number of comments: 10

- All respondents supported the proposal to identify and encourage specific local environmental protection measures.
- Air quality measures proposed included reducing the numbers of vehicles; restrictions on parking and allocating more road space for walking and cycling; promoting cleaner vehicles and tightening vehicle emissions standards; vehicle free days and enforcement of no vehicle idling legislation. Improved planting and greening and water management. Enclosing waste sites to prevent dust was also suggested.
- There was support for some of these measures to be implemented through the planning system with requirements for Air Quality Management Plans to be submitted with planning applications. Expansion of the Low Emission Neighbourhood to cover areas such as Thames Street, Victoria Embankment and Bishopsgate was suggested.
- Water management measures proposed include SuDS to improve water quality and reduce rainwater run-off, and promotion of water efficiency measures
- Noise control was promoted by the Barbican Association, through the adoption of tougher noise standards for contractors, stronger enforcement and restrictions on noisy work on Saturdays in residential areas.

- Light pollution was also raised by the Barbican Association, which called for a robust approach towards offices that cast intrusive light into dwellings. Other respondents suggested offices should have automatic light sensors when rooms/floors are unoccupied, and for the use of solar powered street lighting.

Transport and Motor Vehicles

Question 6.4

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

Number of comments: 16

- A wide range of suggestions were made in response to this question, including: banning private cars during normal working hours; making all other vehicles zero emission; reviewing delivery times; improving public transport; encouraging walking and cycling; increasing car parking charges; better use of existing car parking for alternative uses; and enforcement of the 20mph speed limit.
- TfL suggested incentivising off-peak servicing and deliveries; improving conditions for cyclists and pedestrians; improving bus journey times and making efficient use of space on the roads.
- The CPA supported in principle the use of consolidation centres for new major developments, together with re-timing of delivery and servicing trips outside of peak hours. In addition, there may be an opportunity to reduce bus service frequencies from 2018 onwards with the opening of Crossrail and completion of underground line upgrades.
- The CAAC noted that street clutter impedes pedestrian movement, and asked for a policy requiring the removal of redundant street clutter.
- Other suggestions included developing strategic infrastructure tunnels to reduce the frequency of street works in the long-term; preventing motorised traffic from using Beech Street; and making “direct vision” lorries with minimal blindspots the standard HGV type in the City.

Question 6.5

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

Number of comments: 12

- The majority of respondents (8) welcomed the idea of deliveries being made outside peak periods, including at night-time.
- Three respondents were opposed to off-peak/night-time deliveries due to the impact on residential amenity and because the commercial sector would be undermined by such restrictions. It was suggested that deliveries be made in the early morning where feasible.

- The CPA acknowledged that off-peak servicing may not be achievable for all existing buildings, and suggested it should be particularly encouraged for large scale schemes which can also work with a consolidation centre.
- TfL referred to its London wide retiming programme which encourages deliveries taking place outside of peak hours, and indicated that delivery time periods should be considered within delivery and servicing plans on a site by site basis.
- Off-street servicing for medium-sized buildings was supported by five respondents, albeit with a caveat that this is not always possible in such buildings. The CAAC expressed concern that compelling off-street servicing for medium sized buildings would result in bland inactive frontages and lack of street activity.

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?

Number of comments: 16

- A clear majority of respondents (14) agreed in principle with the promotion of consolidation centres.
- TfL welcomed the promotion of consolidation centres in principle and referred to a number of different types of consolidation, such as procurement led/supply chain solutions and micro consolidation centres.
- The CPA noted consolidation centres could bring a range of benefits, including serving developments in a specific area such as the Easter Cluster.
- Team London Bridge (a Business Improvement District) indicated that it will be investigating options for a consolidation centre in south London and suggested that the City should only seek options north of the river to avoid worsening congestion on key routes across the river.
- Two respondents questioned whether decanting deliveries into smaller vehicles would in fact reduce congestion. Consolidation centres near residential properties would be inappropriate as they operate 24 hours a day.
- Other comments referred to the need to reduce the growing numbers of personal deliveries made by LGV's to City workers.

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?

Number of comments: 16

- 12 respondents commented on the use of electric vehicles and supported the need to provide charging points in accessible locations. However respondents also noted that the increased use of electric vehicles will not reduce congestion.

- TfL highlighted the introduction of the Ultra-Low Emission Zone, which will help to tackle poor air quality.
- The CPA commented that advertising safer cycle routes to destinations in the City could encourage more commuters to cycle to work. There should be further provision of electric vehicle charging points in all new developments and existing where possible. Charging points should also be provided in loading bays.
- Other suggestions included incorporating air filters/extractors into heavily polluted places; transferring existing car parking spaces to car-sharing schemes; reducing on-street car parking; car-free days; and provision of consolidation centres and cargo bikes.
- Promoting other modes of transport was a common theme. The London Cycling Campaign commented that cycling infrastructure has been shown to dramatically boost health outcomes, with spending outranking all other transport modes for return on investment.
- Team London Bridge highlighted the potential for urban greenery, wider pavements and street trees to help mitigate poor air quality on both sides of the river.

Pedestrians, Cyclists and Motorcyclists

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 pedestrianized or time limited, or should certain types of vehicles be restricted in those areas?

Number of comments: 13

- Eight respondents supported restrictions on vehicular movements in some areas and at certain times. Respondents generally favoured restrictions at peak times or the narrowing of roadways to provide more space for pedestrians or cyclists.
- TfL commented that it is vitally important that planning decisions take account of the need to keep developments and street permeable.
- The CPA noted that footway widths will become a huge constraint on future pedestrian flows in the Eastern Cluster, and recommended the transfer of vehicular carriageway space to additional pedestrian space. Ground floor pedestrian passages or retail arcades should be encouraged through major new developments.
- Other comments included support for limiting general traffic at Bank Junction, support for the potential pedestrianisation of St Paul's Churchyard and reference to Cheapside being a model that could be used elsewhere.

Question 6.9

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

Number of comments: 10

- Most respondents were supportive of cycle parking in new developments, with five calling for increased levels of cycle parking.
- The CPA argued that the London Plan cycle standards are already challenging for many schemes and is about the right standard for the next decade. Public cycle parking within private developments would be impractical and likely impossible for reasons of capacity and security.
- The London Cycling Campaign highlighted the importance of showers and changing facilities as well as cycle parking.
- While there was some support for more on-street cycle parking, a number of comments also referred to the need to avoid further street clutter. TFL suggested that the City Corporation should consider innovative cycle parking solutions that would minimise street level space requirements, such as underground parking.

Question 6.10

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

Number of comments: 7

- The majority of respondents felt that no more motorcycle parking is required and that this should not be seen as a priority.
- TfL commented that provision of on and off-street motorcycle parking would come as a trade-off against space for cycle parking, pedestrians and amenity space.
- The CPA recommended that the City explores the use of electric bikes as a potential replacement of motorbike trips.

Waste and the Circular Economy

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?

Number of comments: 13

- All respondents were in favour of waste reduction measures with seven specifically supporting promotion of the circular economy, six supporting on-site waste management on large sites and four supporting zero waste plans.
- Specific measures suggested included promotion of reuse and recycling of demolition waste; use of 100% recyclable packaging by food and drink outlets; anaerobic digestion and on site management of food waste; and ensuring Barbican residents make full use of its existing waste collection and recycling system.

- Some respondents considered that collection and handling of waste and recyclables should be designed into development from the outset, and the Environment Agency highlighted the London Waste and Recycling Board's recent work on waste management in flatted developments.
- The use of Site Waste Management Plans, and standards such as CEEQUAL and BREEAM were advocated to provide delivery of the waste hierarchy.

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?

Number of comments: 9

- All respondents acknowledged that due to the unique nature of the City it will be necessary to continue to rely on waste management facilities elsewhere. A couple of respondents recommended that waste capacity in the City should, however, be assessed through an options appraisal.
- Five of the responses to this question came from waste planning authorities (either individually or as part of a group), who pointed out that waste capacity at recipient authorities is diminishing due to landfill closures. A number of respondents commented that the City should continue to co-operate with the London Waste Planning Forum, the GLA, the South East London Waste Planning Group, other boroughs and authorities elsewhere that receive waste from the City.
- The London Plan's aim for net self-sufficiency by 2026 was supported. However, construction waste is a particular issue as there is currently no agreed apportionment for where this should be managed.
- There was support for the use of Walbrook Wharf coupled with waste management facilities downstream to encourage sustainability and reduce road congestion.

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?

Number of comments: 15

- The majority of respondents (12) thought that Walbrook Wharf should continue to be safeguarded, noting its benefits for low emission waste transport.
- It was suggested that other waste-related uses, such as the transfer of construction, demolition and excavation waste, should be considered at Walbrook Wharf.

- The Port of London Authority highlighted that even if Walbrook Wharf were no longer used for the transport of waste by water, it would still be a safeguarded wharf.
- There was some support for the provision of waste treatment facilities, particularly for food waste, within commercial developments.

Flood Risk

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?

Number of comments: 9

- Four respondents considered that SuDS standards should be applied to all scales of development. However, two respondents felt that SuDS standards should only be applied to major development, with the CPA pointing to viability and feasibility concerns.
- The GLA commented that the applications of SuDS to smaller scale development merits consideration and the Environment Agency highlighted that the policy should be informed by evidence from the City's Strategic Flood Risk Assessment.

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?

Number of comments: 9

- All respondents were in favour of requiring flood resistance and resilience measures for premises in the City Flood Risk Area, with the GLA suggesting the approach to Flood Risk Management is forward looking and seeks to address the particular flood risk challenges in the City.
- Specific measures proposed included the use of non-porous materials at ground floor level and flood resilient doors and windows.
- Other respondents suggested adopting best practice measures at the time of the planning application, following national and regional guidance, using BREEAM, and identifying suitable measures through the Strategic Flood Risk Assessment.

City Communities

General comments

Number of comments: 1

- It was suggested that there should be more inclusion of surrounding boroughs in the Plan in order to better co-ordinate the needs of the City and ensure that these boroughs benefit from the economic success of the City.

Open Spaces and Recreation

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?

Number of comments: 19

- This question produced a clear consensus, with all respondents agreeing that open spaces in the City should be protected, enhanced and expanded where possible. A number commented that open spaces and green areas are vital to achieving the Local Plan's strategic objectives.
- Five respondents felt that existing open spaces should be protected from overshadowing and encroachment of nearby developments.
- There were five comments suggesting there should be a requirement for public open space to be provided at ground level in large and tall building developments.
- Six respondents commented that, while skygardens can provide amenity for office workers, they are no substitute for public open space at ground level.
- The City of London Archaeological Trust highlighted that open spaces have a history which should be made evident in the space itself, adding that historic spaces must be valued because they are historic and serve as places of memory.
- The Chapter of St Paul's Cathedral commented that open spaces are important resources for seeking solace and calm, places for reflection as well as active learning and can support community cohesion, if managed well.
- The Barbican Association indicated that roof top terraces should not be built on office blocks adjacent to the Barbican or Golden Lane estates, but where such terraces are built their usage should be limited to 8am to 7pm.
- The Museum of London commented that there are opportunities to enhance some of the open spaces around West Smithfield as part of the plans for a new museum.

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?

Number of comments: 15

- The majority of respondents (10) expressed a preference for greenery to be given priority in open spaces. Several respondents felt that even the smallest public realm proposals should include some form of planting. Reasons for preferring greenery included relaxation, mitigating the impacts of pollution and climate change, and assisting biodiversity.
- Four respondents felt that a mixture of hard and soft landscaping should be provided, depending on the circumstances of each site.
- Six respondents suggested that developers should be required to maintain public open spaces within their site boundaries.

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?

Number of comments: 16

- The majority of respondents (11) supported the provision of public space and/or employee recreational space within buildings. However, several respondents emphasised that employee recreational space within buildings should not be a substitute for public open space at ground level.
- The CPA expressed concerns about a one size fits all policy on this topic, and does not believe it is appropriate to provide public space or viewing galleries in all major developments or tall buildings. A policy which leads to a proliferation of viewing galleries is not considered sustainable, or necessarily in the best interests of the City.
- The Barbican Association reiterated concerns about roof terraces close to residential clusters, and suggested that developers be encouraged to make imaginative use of internal atriums, for example to include climbing walls.

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?

Number of comments: 14

- All respondents suggested what they would like to see in open spaces, but there were few comments on whether the Local Plan should specify types of facilities in particular locations. Amongst the suggestions were: seating (in sunlight); eating areas; rain shelters; easy access to toilets and catering facilities; lighting; trees; wildlife and water features.
- The Barbican Association suggested that where there is space in a large development, away from residential clusters, the hard landscaping should include sports facilities.

- The CPA commented that factors will vary between sites and did not wish to see a prescriptive policy on this topic, whilst supporting the ambition of the policy sentiment.
- The Chapter of St Paul's Cathedral commented that modest commercial use of open spaces, if well-judged and managed, could provide a public benefit and is an issue worthy of consideration.

Retailing

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?

Number of comments: 10

- Respondents to the first part of this question supported the retention of the PSCs, although three mentioned the need to review current PSC boundaries.
- The Museum of London suggested there may be a case in the future for a new PSC in the Farringdon area to reflect the potential change in character resulting from Crossrail and development activity in this area.
- There was a mix of views regarding prioritising A1 (shop) units in PSCs. Four respondents supported prioritising A1 units, or at least setting a baseline level of A1, although the CPA qualified this with the comment that policy should not be too prescriptive.
- The Barbican Association suggested that permissions for A3 uses (restaurants and cafes) in or opposite the Barbican Residential Estate should be conditioned to prevent an A5 (hot food takeaway) element in order to avoid nuisance from delivery services.

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?

Number of comments: 10

- There were mixed views in relation to this question. Three respondents felt that the retail links still serve a clear purpose. On the other hand, three respondents were in favour of allowing retail uses throughout the City, unless there is a particularly strong reason not to allow it.
- Tower Hamlets suggested a new retail link north of the Liverpool Street PSC to promote movement between there and Spitalfields Market.
- Two respondents supported continued policy protection of isolated retail units, while two were opposed to this.

Housing

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?

Number of comments: 19

- The majority of respondents (12) supported residential development being permitted anywhere in the City providing the site is not suitable for office use and a reasonable standard of residential amenity can be achieved.
- It was argued by some of those who supported a dispersed approach that policies should be flexible and the potential for residential use should be considered on a site-by-site basis. Others stated that residential development can co-exist with offices and that there are good examples of this in the City.
- Five respondents, including the GLA and the CPA, favoured a continuation of the current policy approach of focusing new housing in existing residential areas.
- Four respondents felt that residential boundaries should be defined or made clearer in the Plan, while three respondents were opposed to defining specific boundaries.
- The Chancery Lane Association stated that it would object to defined boundaries if the Chancery Lane area were not included within a residential area.

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?

Number of comments: 12

- The majority of respondents (9) considered that the City should at least meet the housing target in the London Plan. Of these, 5 expressed support for potentially exceeding the London Plan target and 4 referred simply to meeting the target.
- Two respondents felt that either no additional housing or the absolute minimum should be provided within the City's boundaries.
- The GLA and TfL both stated that the City should meet its London Plan housing target, but added this will need to be managed in ways which do not compromise the City's strategic CAZ roles.
- The Barbican Association called for measures to prevent residential units being bought by overseas investors and never occupied.

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?

Number of comments: 16

- The majority of respondents (11) stated that it is feasible for residential units to be successfully incorporated in buildings alongside non-residential uses.
- Some respondents felt that mixed-use developments should be encouraged because they would bring wider benefits, such as allowing for interesting design solutions or assisting with placemaking.
- A number of respondents, while supporting co-location of uses from a design point of view, did not specifically state whether or not this would be desirable in the City.
- Four respondents were opposed to mixing residential and non-residential uses in the same building, either because this would impact on the flexibility required to respond to changing business needs or because it would result in a loss of 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?

Number of comments: 5

- All respondents felt there is a need for specific types of housing in the City, albeit they had different views on what that should comprise. Suggestions included rent to buy housing; short-stay accommodation with weekly or monthly rentals; hostels; student-type accommodation with flexible tenancies; key worker accommodation; and sheltered housing for the elderly.
- While three respondents supported the provision of short-stay accommodation, the Barbican Association felt that hostels, student accommodation and short term lets should be discouraged within or close to residential clusters due to their impact on amenity.

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?

Number of comments: 9

- This question prompted divergent views, with four respondents supporting an increase in the level of affordable housing within the City and four against.

- Amongst those who supported an increase, two respondents commented that starter homes alone would not adequately address housing needs and that an increased target would enable other affordable housing tenures to be provided.
- Those who did not support an increase felt that provision of affordable housing is more appropriate elsewhere in London where there is less competition from commercial users.
- Four respondents supported the City's current approach to collecting commuted sums and using these to deliver affordable housing outside the Square Mile.
- The Barbican Association suggested that the new housing should be within 2 km of the City's boundaries to make it easier for lower paid City workers and key workers.
- On the other hand, two respondents favoured on-site affordable housing provision.

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?

Number of comments: 5

- Three respondents considered there were no suitable areas in the City for 'permission in principle' housing development.
- A landowner put forward a site in Lower Thames Street as suitable for residential development as part of a mixed-use scheme that includes offices and retail. Another respondent suggested the St. Paul's and Smithfield areas would be suitable.

Social and Community Infrastructure

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?

Number of comments: 4

- The Barbican Association highlighted that City workers can register at City GP practices, yet there is only one NHS doctors' surgery within the City. It advocated securing space for additional surgeries within large redevelopment schemes with the aim of achieving an NHS surgery in each of the four quarters of the City.
- The CPA considered that current policies are appropriate to achieve a diverse range of facilities and services to meet current and future City office needs.
- The Campaign for Real Ale (CAMRA) felt that the development of traditional pubs for alternative, more profitable uses is a major threat to the future vibrancy and vitality of the City. It called for a specific policy to protect pubs in line with the broad requirements of the NPPF and the London Plan.

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?

Number of comments: 6

- Two respondents felt the City Corporation should work with neighbouring boroughs to provide social and community facilities. Given the unique nature of the City, the GLA indicated it is acceptable to consider shared provision with adjoining boroughs, although there may be demand for certain types of daytime services for the working population.
- Two respondents considered that services and facilities should be located within the City. The CPA noted that social and community services are hugely important to the functioning of a sustainable City, while the Barbican Association felt that the necessary physical infrastructure and buildings should be within the City.

Appendix 3 – comments received at public consultation events

Topic	Comments from 1 st consultation event 03/10/16
Offices/SMEs	How will the plan address those SMEs that wish to remain small and not expand?
	City needs more creative industries and not 'for profit' organisations.
	Corporation needs to engage with SME's and residents.
	The City has character but this is being threatened by large buildings. Given Brexit, large floor space buildings may become less attractive.
	The cost of the City's office space is a pertinent issue. Policies need to be robust to avoid being overridden by high rents.
	Since the 1980's office rents have not increased.
	Interesting to see how City treats its own development sites. Eastern Cluster integration with area over the boundary. Contrast between one of the wealthiest Local Authorities and most deprived.
	Large floor plate buildings should be designed to be flexible so they can accommodate small business space as well.
Tall Buildings	Important that tall buildings are grouped to avoid a messy look to the skyline.
	Retaining tall building constraints indicates that the City is actively planning the skyline.
	As land is so valuable, developers are maximising profits by building taller. City must combat short-term wins.
Development (general)	Pushes activities outside City because of the concentration inside the City e.g. South Bank – easier to accommodate different uses.
	Designs of buildings and support services are not keeping up with requirements.
	Different types of property, including offices and residential should not be mixed.
Environment	Pollution levels in the City are too high. Key cause of poor air quality is traffic and construction activity.
	City should be a little Singapore. Green space on top of buildings excuses other initiatives, shouldn't be let off the hook.
	There are conflicts within the Corporation; green issues are not given enough importance.
	Contradiction in permitting residential development along Thames Street given high levels of pollution.
	The Circular Economy is not given sufficient priority in the planning process. Policy and Resources Committee does not give enough priority to refurbishment and saving resources. Need references throughout the Plan.
	The Sustainable City Forum should be prioritised and allowed to have influence.
Servicing and Deliveries	Need to ensure that deliveries are still able to service the centre of the City.

Parking	There is no reference to disabled residents. On-street spaces should be provided for disabled residents. Blue Badge provision doesn't reserve spaces for residents. In Westminster there is allocated parking for disabled residents. There is a problem with disabled parking in residential conversions not being maintained for people with disabilities.
Residential amenity	Residents living in Andrews House facing Fore Street suffer constant disturbance from coaches in bays, taxis and drivers. Traffic laws are not being enforced. Would be useful to close Fore Street to traffic.
	Development of new buildings needs to consider disturbance to residents.
	What is the City's future view on rights to light?
	Residential amenity is a big problem for residents. Residents suffer from noise and bars and restaurants with late licenses. People and their noise are not managed as they leave the premises.
Public Realm	The City has the potential to be characterful and a great place to walk around. However, the City is a grim place to walk around due to the degree of development.
	More greenery in the Barbican needed.
	Street cleaning does not keep pace with increasing visitor numbers, particularly at weekends, when there are more visitors and construction workers.
	Need a beautiful entrance to the new museum and the Barbican. Roads should have creative art and design shops; good examples - Landmark Trust building and Geranium.
Policy-making/ implementation	Will this consultation exercise sincerely seek to address issues raised?
	Is there someone with an arts background in DBE?
	Difficult to get planning conditions honoured and enforced.
	Need to make sure that policy in the Plan transpires into reality and is able to mitigate noise and disturbance. There is too much appeasement by elected representatives. Members make decisions but barely read the relevant reports.
	Corporation should be stricter in enforcing policies and regulations e.g. views affected by the Garden Bridge and peanut seller carts.
	Corporation gives too much leeway to developers on key issues
Transport	What is the Corporation's vision for transport in 20 years' time? What level of electrification is anticipated? Drones may replace deliveries by van.
	Need more cycle lanes and a reduction in vehicular traffic.
City Fringe	Relationship between City Fringe/Canary Wharf/London Plan is important. City Corporation must work with its neighbours.
	Shoreditch becoming too expensive. SMEs moving into City as rents in Shoreditch area increase.
	Tech City has passed the City by.
	Norton Folgate is prime commercial property which, if in Mayfair, would command very high rent. City is dislodging this type of floor

	space.
Puddle Dock	Puddle Dock area needs redevelopment.
	Need for strategic impetus and direction for Puddle Dock. What is happening at White Lion Hill? Any plans for progress?
Night-time Economy	To what extent is CoL prepared to enforce its policies? Need more stringent enforcing of breaches of night time economy conditions, protection of public realm.
Emissions	More information is needed on the Low Emission Neighbourhood, how it will operate and how it will be enforced.
Waste	Need to minimise waste and how it is transported. Demolition and construction waste from Queensbridge House should have been moved by the river.
	Should try and refurbish rather than demolish buildings. Need laws to regulate waste, similar to the Clean Air Act laws.
Housing	Housing target should be increased. Housing target should be broken down by tenure and target formulation should be more transparent.
	Affordable and specialist housing should not be moved out to other boroughs.
Views	Views should be protected.
Hotels	Need more hotels.
Health and Wellbeing comments	The Joint Strategic Needs Assessment team had a separate display table at our consultation event. They asked consultees to indicate what they felt were the key health issues facing the City. People were asked to indicate whether they were residents, workers or other as below.
Residents	
<ul style="list-style-type: none">• Loss of daylight• Traffic-speed control needed• Cycle Super Highway• Road traffic - too many buses and taxis• Air pollution• Lack of green space• Noise pollution - too much construction• Illegal building work• Noise outside quiet hours• Rubbish collection• Street cleaning• Black carbon• Idling lorries and diesel generators	
Workers	
<ul style="list-style-type: none">• Need for more sports facilities• Protection of cyclists and motorcyclists• Space to relax more - open spaces• Support for mental health issues• Noise pollution• Lack of public realm• Air pollution	
Other	
<ul style="list-style-type: none">• Air pollution• Fog	

Topic	Comments from 2nd consultation event 13/10/16
Retail	Allow more retail in quieter places as long as there is enough footfall
Economy	How will Brexit impact planning the City?
Tall Buildings	Build taller than Dubai
Servicing and deliveries	Favours the use of consolidation centres
	Encourage more catering facilities within buildings
	Timed deliveries to avoid the rush hour
Development (general)	How can we find new uses for old buildings?
Environment	There should be a co-ordinated scheme for flood defence raising across London, with a London wide levy to pay for this
Amenity	Concerns around noise from flats let through Air bnb. Could CoL adopt a similar approach to Berlin?
	Concerns about loss of natural light and sunshine as a result of development
Public Realm	The trees in front of the Cheese Grater are not looking very good – how can we improve the public realm around there?
	Tables in open spaces
	How can you improve the public realm and rubbish? Particularly around lunchtimes.
Policy-making/process	Too many people involved!
Transport	How can new technology be used to help remedy traffic congestion?
	Electric vehicles should be encouraged
	Communal cycle storage in buildings reduces cycle theft
Fleet Street	Fleet Street should be more pedestrian friendly
Smithfield	Is Smithfield Market going to stay in the same place? The traffic around the market is very bad.
Cultural Hub	What about the Cultural Hub?
Night-time Economy	Issues with licensed premises and the night-time economy. Is there an upper limit for licenses in the City?
	Private functions at licensed premises at the weekend are an issue – hard to track and manage these.
	How can you accommodate late and/or early workers in the City?
Emissions	No emission tax
Smart City	Free WiFi should be available everywhere including the Tube
	City should be a CISCO style smart city
	Work space in parks
Waste	Should encourage on-site waste management in large developments, but may not be popular with developers
	Public management of waste collection rather than relying on private contractors
Security	Should have more attractive anti vehicle measures – not just bollards
	Are there any technological advances to improve security around

	the Eastern Cluster?
	ATTRO has decreased traffic around St Mary Axe
Housing	No more residential development
Hotels	Aldgate area should be extended to include existing hotel cluster at Tower.
	How can you stop hotels being turned into offices for big businesses/banks?
	Shortage of hotels in central part of the City
Conference Centre	Lack of large conference centre in the City

Low Emission Neighbourhood Launch event 11/01/17

At the Local Plan stand we posed 2 questions from the Issues and Options consultation document:

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?

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?

The following post-it note comments were received:

Topic	Comment
Electric vehicles	Promote electric charging points in car parks – especially in the Barbican
	Promote electric vehicles as long as residents without electric vehicles can still access car parks
	Electric police and emergency service vehicles
	Encourage charging points for electric vehicles
	Incentivise electric vehicles
	Support electric vehicle only taxi rank at Lauderdale Tower
Beech Street	Close Beech Street Tunnel to <u>all</u> traffic immediately
	Improve air quality in Beech Street Tunnel
	Close Beech Street Tunnel
	Consider the knock on impacts of rerouting Beech Street to other neighbouring streets
	How would we enforce ban on non-electric vehicles in Beech Street?
Parking	Stop all car parking. Provide cycle parking at all public venues especially Barbican
	Reduce motor cycle parking to reduce noise levels
	Link CO2 emissions to parking costs
Vehicle emissions	Fine all idling vehicles – including police
	Remove diesel vehicles from <u>all</u> London Streets
Emissions from buildings	Reduce pollution associated with emergency diesel generators
	Emissions from buildings de-coking on Saturday morning are noticeable – vapour/mist
	Do not allow or especially not incentivise the use of diesel generators by City businesses

Building sites	Stop building altogether – Air pollution from building sites kills people. Compare this with action to prevent exposure to smoking.
	Reduce dust from building sites
	Air Quality Management Plans should be submitted with planning applications
Deliveries and servicing	Provide space in buildings for deliveries to avoid queuing in the street
	Promote consolidation of deliveries
	Light pollution is a concern – loading bays as well as buildings
Greening and environment	Improved planting and greening would have air quality benefits
	Green barriers to reduce particulates
	Make clean air walking routes more visible
	Create more play streets
	Water collection from Podium waterproofing project – extension of Beech Gardens
Beyond the City	Extend air quality initiatives beyond the City boundary
	Initiatives in the City must not have negative impact elsewhere

Appendix 4 – comments on Integrated Impact Assessment

As part of the Issues & Options consultation the following documents were published for comment:

- Integrated Impact Assessment Scoping Report
- Scoping Report Appendix 1 – Other plans and programmes
- Scoping Report Appendix 2 – Baseline information
- Scoping Report Appendix 3 – Consultation Responses
- Integrated Impact Assessment Commentary Document

Responses: Comments were received from two statutory consultees; the Environment Agency and Historic England. The City Corporation's response to these comments is recorded in the following table and will be reflected in the next iteration of the IIA at draft City Plan 2036 stage.

Organisation: Environment Agency

Comment: Thank you for taking into account our previous comments at the scoping stage of the IIA. We welcome the changes you have made to the IIA report to the criteria questions for objectives on waste management, environmental protection, climate change and biodiversity and urban greening. There is also the opportunity to use the current WFD status of the New River and Thames (Middle) as an indicator for water quality or biodiversity. Both are currently achieving moderate status. The water body summary reports I've enclosed specify the reasons for not achieving good, and list the draft action measures required to achieve good status by 2027.

City Corporation Response

The draft SA Scoping Report appendix 2 baseline information has been amended to include the current WFD status for the Thames (Middle) and proposed measures required to achieve good status by 2027 have been noted.

The WFD status of the New River has not been included since it does not flow through the City and there are no actions proposed within the City to improve its status.

Organisation: Historic England

Comment: In our response to this version of the IIA Scoping Report, we draw your attention to our letter (dated 25th February 2016) in response to the previous iteration of the IIA Scoping Report as published in January 2016. For example issues not yet addressed include:

- Baseline – commentary on the condition of heritage assets in the City there are a small number of assets on Historic England's Heritage at Risk Register (2016) (e.g. 1 listed building, 3 Places of Worship and 3 Schedule Monuments).
- Compatibility Matrix – where the commentary on the relationship between heritage and economic growth objectives is ambiguous, yet on the matrix it is marked as a 'x', which suggests conflict. Greater clarity is needed.

City Corporation Response

The draft SA Scoping Report appendix 2 baseline information paragraph 8.3 has been added providing details of the condition of heritage assets that are “at risk” in the City.

The compatibility matrix has been amended to indicate uncertainty regarding the impact of heritage assets on economic growth. Further monitoring is underway to determine the impact of heritage status on planning permissions.