

<b>CONSULTATION ON DRAFT LONDON PLAN, DECEMBER 2017 – CITY CORPORATION RESPONSE</b>	
	<b>CITY CORPORATION KEY COMMENTS</b>
	<p>The City Corporation welcomes the opportunity to comment on the Draft London Plan. The Corporation considers that there is much in the draft Plan that can be supported:</p> <ul style="list-style-type: none"> <li>• The emphasis on Good Growth and placing improvements to the health and quality of life for Londoners at the heart of planning for the growth that London needs to continue to thrive.</li> <li>• Strong policy support for office development within the City of London, as part of the CAZ, and an indication that office and other CAZ strategic priorities, including cultural activities, should be given greater weight than residential development.</li> <li>• Support for further development of cultural and entertainment uses, including within the Barbican/Smithfield/Farringdon area (Culture Mile).</li> <li>• An emphasis on green and sustainable development and infrastructure, including actions to deliver improvements in air quality.</li> <li>• The delivery of the Mayor’s Healthy Streets agenda, reducing the impact of freight and servicing trips and support for consolidation of freight.</li> </ul> <p>However, elements of the draft Plan would have adverse impacts on the City of London and the City Corporation highlights the following areas of particular concern:</p> <ul style="list-style-type: none"> <li>• A number of policies in the draft Plan contain an inappropriate level of detail for a strategic plan.</li> <li>• The requirement for external design review of development proposals over 30m in height, would add greater complexity, cost and uncertainty to development in the City and ignores the significant experience on design matters within the City Corporation.</li> <li>• The level of housing growth proposed for the City is above the level of locally assessed housing need, and would appear to conflict with the draft Plan’s strong emphasis on the role of the City of London as an office centre of national and international importance.</li> </ul>
<b>CHAPTER 1: PLANNING LONDON’S FUTURE (GOOD GROWTH POLICIES)</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
Chapter 1 – General Comments	The City Corporation welcomes and supports the Mayor’s emphasis on Good Growth within the London Plan. This places measure to improve the health and quality of life for Londoners at the heart of the plan, allowing it to address cross-cutting issues, rather than a more traditional approach which identifies policies for particular land uses to the detriment of quality of life issues. The strategic approach to these policies is an appropriate response within a London-wide plan, leaving greater scope for boroughs and the City to address locally specific issues at the Local Plan level.

GG1: Building strong and inclusive communities	<p>The City Corporation welcomes the enhanced emphasis on inclusivity. There could be more emphasis on ensuring economic inclusivity, recognising the importance of arts and culture in creating strong and inclusive communities, for example ensuring that all members of society regardless of means feel welcome and can access services, entertainment, culture and heritage, allowing all the public to benefit from London's amenities.</p>
GG2: Making the best use of land	<p>The City Corporation supports the overall approach, but considers that specific reference could also be included to making the best use of land within the CAZ to support the wider CAZ strategic functions, including office development.</p> <p>Recognition of the importance of land used for small scale commercial enterprises and light industrial uses would be beneficial within this policy. Businesses, employers and cultural institutions in the City, such as the Barbican, are reliant on the services of a wide range of small commercial enterprises and suppliers based in the capital, with this kind of industrial space increasingly under threat.</p> <p>Paragraph D, suggest changing "promote the creation of" to "deliver".... "new green infrastructure and urban greening". The Plan should ensure that all development delivers on urban greening, whether it be major development, a new building or a roof terrace. The policy should also include reference to the need to provide additional high quality public space and more space for pedestrians and cyclists to support the growing population.</p>
GG3: Creating a healthy city	<p>The City Corporation welcomes the consideration of creating a healthy city and the underlying Policy. The Corporation suggests that this approach is co-ordinated with an emphasis on treating public health funding on a par with other clinical funding within London NHS budgets. The Policy should also be extended to include visitors and workers within London as these constituents are not mentioned within the policy and are critical to London's economic, social and physical wellbeing.</p>
GG5: Growing a good economy	<p>The City Corporation supports this policy, but considers that it should also include specific provision recognising the strategic importance of the CAZ to London's economy.</p> <p>Paragraph F, welcome the explicit connection between heritage and cultural assets and good economic growth. This could be strengthened to state that development should ensure and strengthen the contribution of London's rich heritage and cultural assets to the global brand and economic growth. The justification should recognise that heritage and culture is good for business, bring visitors, leisure opportunities, enhanced wellbeing. It should state that new development should deliver inclusive public access to London's heritage and cultural assets so that all feel part of London's growth.</p>

	Paragraph F, as well as promoting and supporting London's cultural assets, should also reference plans to expand and develop these assets.
<b>CHAPTER 2: SPATIAL DEVELOPMENT PATTERNS</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
SD1: Opportunity Areas	There are no Opportunity Areas within the City, but the City Fringe/Tech City OA adjoins the City's eastern boundary. The City Corporation supports the emphasis within the policy on accommodating suitable employment and housing growth within the OAs, subject to the provision of necessary infrastructure to support that growth.
SD2: Collaboration in the Wider South East	The City Corporation strongly supports the Mayor's commitment to continued and wider collaboration on key issues and shared challenges between London authorities and those in the Wider South East, recognising that London is part of an extensive and complex network of centres.
SD4: The Central Activities Zone (CAZ)	<p>The City Corporation welcomes and strongly supports the Mayor's approach to planning in the Central Activities Zone, and the City of London. The City Corporation welcomes the acknowledgement and strong policy support for the internationally significant office cluster in the CAZ and the need to plan for sufficient office space to meet demand. The recognition of the need for public realm enhancement, infrastructure improvements (including the need for consolidation for freight and servicing), digital connectivity and the need to promote safety, security and resilience are all supported. Greater emphasis could be given to ensuring the CAZ contributes to broader inclusivity, so that its offer and amenities ensure all sections of society benefit.</p> <p>The Policy recognises that practical measures should be taken to improve air quality in the CAZ, including an air quality positive approach, where possible. This recognition is welcomed and the City Corporation looks forward to working closely with the Mayor and TfL to develop and implement practical and innovative measures to address air quality issues within the City of London and the wider CAZ, building for example on the City's Low Emission Neighbourhood designation.</p> <p>The City Corporation also supports recognition of the wider role and function of the CAZ and the increasingly important role that other strategic functions play in ensuring that London remains a leading world city, including recognition of the role of culture, arts and entertainment, and the specific mention in the explanatory memorandum of the arts, culture and creative cluster at Barbican/Smithfield/Farringdon. The City Corporation is working closely with arts and cultural organisations to further enhance this cluster through the Culture Mile initiative, including the provision of a new location for the Museum of London and a Centre for Music. Given the London-wide (and wider) importance of these institutions, along with the Barbican, it would be helpful if the London Plan could specifically identify the Culture Mile ambition alongside the illustrative depiction of Culture Mile in Figure 2.16.</p>

	<p>The Plan should also consider the interaction between the various clusters within the CAZ rather than viewing them in isolation e.g. current and potential relationships between arts/cultural and tech and/or research clusters which are often in neighbouring areas e.g. proximity of Barbican and Tech City. The Plan could also recognise how cultural clusters often support and sustain retail clusters by attracting audiences/visitors.</p> <p>The City Corporation welcomes the statement in paragraph M that sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions, within or close to the CAZ, to support the needs of businesses and activities located within it. Many businesses in the City rely on ‘just in time’ servicing and logistical arrangements, and their operational efficiency would be compromised if the further loss of industrial land within inner London led to longer journey times for essential services such as office supplies, repair and maintenance, waste management and recycling.</p> <p>Paragraph (C) could be strengthened to state that the often unique heritage and cultural assets of the CAZ are to be sustained and enhanced, with improved access and interpretation of them for all Londoner’s to enjoy. This is considered central to the objective of Good Growth.</p> <p>Paragraph (F) should go further and encourage retail as part of mixed-used development throughout the CAZ.</p>
SD5: Offices, other strategic functions and residential development in the CAZ	<p>The City Corporation strongly supports the emphasis on the role of the City of London as an office centre of national and international importance. The statement that ‘residential development is not appropriate in the commercial core of the City of London’ is welcomed, together with the indication that outside of this core, other CAZ strategic functions (such as culture and entertainment) should be given greater weight relative to residential development. The policy provides a strong foundation and support for the long-standing approach in the City of London Local Plan which gives priority to office and commercial development within the City of London. The City Corporation also welcomes the continued support within the Plan for off-site contributions, land use swaps and credits in lieu of mixed-use development in the CAZ in order to sustain the strategically important cluster of commercial activity in the City.</p> <p>The City Corporation welcomes the Mayor’s support for the introduction of Article 4 Directions within the CAZ to permanently remove office to residential permitted development rights. The City Corporation is introducing a non-immediate Article 4 Direction to come into effect on 31 May 2019.</p> <p>There is, however, a concern that the strong statement of commercial priority within the City conflicts with other policies in the draft London Plan, specifically Policy H1 which sets a challenging housing target for the City. The City</p>

	<p>Corporation is concerned that the requirement for a higher level of housing development could compromise the City's ability to deliver the scale of commercial, principally office, development necessary to ensure that the City of London can fulfil the strategic priority set out in Policies SD4 and SD5. The Mayor should reduce the housing target for the City to a level commensurate with the City's own estimate of housing need to ensure that the strategic priority for commercial development within the City of London can be met. The City Corporation will continue to make provision for increased housing provision London-wide, including affordable housing, through development on its own housing estates and through development on Corporation owned land elsewhere in London.</p>
SD6: Town centres	<p>The Mayor should clarify that redevelopment and intensification of town centres to deliver additional housing should not apply in the CAZ Retail Clusters within the City of London, where the priority (in line with policies SD4 and SD5) should be on the delivery of commercial development to sustain the strategically important role of the CAZ.</p>
SD7: Town centre network	<p>The City Corporation welcomes the continued identification of the City of London's Principal Shopping Centres as CAZ Retail Clusters. Policy SD7 indicates that the classification of town centres at the upper end of the London hierarchy can only be changed through the London Plan, whereas changes to District, Local and Neighbourhood centres can be brought forward through Local Plans where supported by local evidence. There is no mention, however, of changes to the CAZ Retail Clusters. The City Corporation is currently examining the need for amendments to the network of PSCs in the City through the Local Plan Review and the London Plan should recognise the potential for alterations where justified by local circumstances.</p>
SD8: Town centres: development principles and Development Plan Documents	<p>The policy outlines a sequential approach to retail development across London, which accords with national guidance as set out in the NPPF. It sets detailed guidance on what is expected in borough Local Plans in relation to retail, including definition of town centres on policy maps. The City Corporation has no objection to the overall approach to retail development, but it does seem to relate principally to larger, more traditional town centres, and is less applicable to the CAZ retail clusters in the City of London which are narrower in extent and focussed on retail frontages. London Plan policy should be sufficiently flexible to respond to changes in the extent and designation of centres through Local Plans.</p>
<b>CHAPTER 3: DESIGN</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
D1: London's form and characteristics	<p>Paragraph B (4), there could be reference to improving public access to heritage assets.</p> <p>The City Corporation welcomes the importance placed on comfortable pedestrian environment (sunlight, shade, wind, air pollution, noise and shelter) in para 3.1.2. These factors should be key in informing new development design, in the main part of the policy.</p>

	<p>Welcome maximizing urban greening but more emphasis should be placed on the need to integrate urban greening in the key early stages of design development of schemes as opposed to retrofitting late on.</p>
D2: Delivering good design	<p>The City Corporation supports the emphasis on incorporating good design principles into development plans and strategies and in assessing development proposals.</p> <p>It is suggested that Paragraph A (4) should include pedestrian flows and stress areas and Paragraph A (5) should include wind patterns and intensity and sunlight levels to ground.</p> <p>The reference in paragraph C to the use of modelling assessments, including 3D and visual assessments, is welcomed. The City Corporation has for several years been a leading proponent of the potential of 3D modelling to aid the design and development process and looks forward to working closely with the Mayor and his planning team to refine this modelling and promote its wider use across the capital.</p> <p>The City Corporation supports the requirement for development proposals to include design and access statements to demonstrate how a proposal meets the requirements of the development plan.</p> <p>The City Corporation objects to the requirement in Policy D2 for boroughs to make use of external design review processes to assess and inform design options early in the planning process. This requirement would have a significant impact on development in the City of London, with most new development exceeding the 30m threshold and having to undergo additional assessment to the City's own consideration, adding additional cost, complexity and uncertainty to the development process. The City Corporation has an established reputation for delivering buildings of a high quality of design and layout, producing buildings that have been critically acclaimed and recognised through international design awards, and has good working relationships with the numerous international architecture practices often engaged by developers to work in the City. The City Corporation's design input is delivered by a strong team of experienced and highly regarded officers, with experience in design, historic buildings, archaeology as well as development management. Regular liaison with the City's developers has revealed no external perception that there is a design quality issue arising from the City's advice that needs to be addressed through the proposed external process.</p> <p>There are already numerous design review bodies and statutory consultees who provide advice on aspects of design in the City, including the City's Conservation Area Advisory Committee, CABD/Design Council, the GLA, the Victorian Society and 20<sup>th</sup> Century Society and Historic England. There is no need to add further complexity through the introduction of an additional, and separate, design review panel.</p>

	<p>The City Corporation fully supports the need to deliver high quality design and layout to ensure that development makes a positive contribution to London’s built environment. However, the requirement for external design review to be applied across London irrespective of existing local circumstances is excessive. The City Corporation accepts that not all boroughs have the level of design resource available within the City Corporation and that design review panels can play an important role, but London Plan policy should provide flexibility for boroughs to determine the need for design review, whilst delivering a high standard of design. Policy D2 (F &amp; G) should be amended to encourage the use of external design where a local authority considers it will make a positive contribution, but it should not be a requirement on all local planning authorities. Similarly the requirement that schemes referable to the Mayor should have been through external design review is excessive, unnecessary and should be deleted.</p> <p>Explanatory Memorandum paragraph 3.2.10: “Securing the design team’s ongoing involvement” is very welcomed. The issue of original architects being dismissed post consent is becoming commonplace in London and is of increasing concern to London planning Departments. There is the question about how this could be secured in practice.</p>
D3: Inclusive design	<p>The City Corporation strongly supports the requirement for inclusive design across all development in London. However, the concept of “Inclusive City” also covers economic and social inclusivity. This policy ought to ensure that the design of developments is economically inclusive as possible (e.g. social housing entrance at the rear adjoining the bin store whereas the market housing entrance is on the principal façade; parity of access to the roof level free public viewing gallery when compared with a high-end restaurant at roof level; ensuring that the design is inclusive to all members of the community including children, families and the elderly). These key issues and the wider definition contained in paragraph 3.3.1 should be included in the main Policy text not just in the explanatory text.</p> <p>The requirement for at least 1 fire evacuation lift suitable for use by those requiring level access from the building goes beyond the responsibilities and powers of the local planning authority and is a matter that will be dealt with through building control (either local authority or approved inspectors). The local planning authority can encourage the provision of such facilities, and can encourage the submission of information demonstrating how fire safety issues will be addressed within a development, but cannot determine an application on the basis of whether a proposal meets or does not meet building regulations, or enforce the provision of equipment/designs required by building regulations. Policy D3 should continue to encourage the provision of information to demonstrate how the development will provide level access via fire evacuation lifts and encourage liaison</p>

	<p>between local planning authorities and building regulations, but it cannot require.</p>
D4: Housing quality and standards	<p>The City Corporation supports the provision of strategic guidance in the London Plan on the need for high quality housing development. However, Policy D4 includes very detailed standards for private internal space and outside space which will apply to new residential development. Previous London Plans included guidance on minimum space standards but did not provide the same level of detailed policy guidance as in the current draft Plan. This level of detail precludes local interpretations and application, for example the potential to deliver required standards within designated heritage assets or the ability to deliver private outdoor space within densely developed areas of central London such as the City of London. Policy D4 should provide strategic direction on housing quality and standards with suggested space standards set out in supplementary documents rather than being included within policy.</p> <p>Guidance on the need to consider standards for noise in residential development and signposting to relevant detailed guidance, or cross reference to Policy D13, would be helpful.</p>
D7: Public realm	<p>The City Corporation welcomes the strong emphasis on delivering a public realm which can accommodate for a myriad of functions: sustainable transport movement (walking and cycling), vibrant use, urban greening and public art and open events. However, in particular in the CAZ, it should recognise that accommodating servicing is essential to allowing a place to function and is an increasing conflict with this agenda. It is suggested that the policy tackles servicing requiring:</p> <ul style="list-style-type: none"> <li>• Requirement for off-street servicing where practicable;</li> <li>• Single access off-street servicing where possible as part of the re-development of larger sites;</li> <li>• Need for servicing agreements to ensure conflict with the public realm is minimised; and</li> <li>• A requirement to minimise servicing entrance and for them to be designed in a manner which is attractive.</li> </ul> <p>The City Corporation’s pedestrian modelling suggests the City of London’s essentially Medieval and Victorian street network and public realm is under significant stress, both at present and in the future with projected significant employment and population growth. It is suggested that the policy should recognise as essential that new development delivers new public realm and an improvement in the quality of the public realm to absorb the additional numbers whilst creating a public realm which is vital, comfortable and safe, allowing for active frontage, space for rest and relaxation and urban greening. Measures such as the reallocation of space from vehicles to pedestrians and cyclists should be considered.</p> <p>Welcome, at paragraph 3.7.1, that the definition of the public realm is extended to “some internal or elevated spaces, such as shopping malls, sky gardens, viewing platforms, museums or station concourses. The recognition</p>

	<p>that such forms of public realm are particularly important in areas of higher density is also welcomed.</p> <p>In this context, the City Corporation considers that the main body of the text should include a more radical policy requiring the creation of both ground and elevated public realm to accommodate a sufficient public realm, making explicitly reference to upper floor galleries, viewing platforms, sky gardens from which wider views and a greater appreciation of London can be made, making people feel part of the City, creating a more inclusive environment.</p> <p>In Paragraph A, it is suggested that this could make reference to the public realm containing historic interpretation should allow people to engage with deep layers of London history.</p> <p>Policies D7 and S11 (Improving Air Quality) advise that design solutions can improve air quality in open spaces and the public realm, however there appears to be no further text in the Plan which indicates how this could be achieved. Further emphasis and guidance on this issue would be useful as many spaces are designed to minimise maintenance costs and/or look attractive but do not include design measures to reduce exposure to air (and noise) pollution.</p>
D8: Tall buildings	<p>The requirement for a plan-led approach to the location of tall buildings is supported, as is the Mayor's intention to provide guidance on the design, construction, use and servicing of tall buildings and requirements for assessing the environmental impacts. However, the level of detail and guidance within the policy is excessive for a strategic document and should be left to local determination through detailed policies in local plans, which can better reflect local circumstances.</p> <p>Paragraph D which requires the inclusion of publicly accessible areas within tall buildings is welcomed, although it should be amended to clarify that such areas should be free to enter and should normally be located at the top of the building to afford wider views across London. High level viewing platforms and uses are a much more meaningful in allowing the wider public to appreciate the elevated views which is a major public benefit given the substantial impact of tall buildings on the skyline. This would place London at the forefront of World Cities in delivering truly inclusive tall buildings which benefits the wider public.</p> <p>Welcome paragraph 3.8.4 which states that publicly accessible upper floors in tall buildings should be freely accessible and considered as public realm.</p>
D10: Safety, security and resilience to emergency	<p>Guidance on safety, security and resilience is welcomed, as is the specific reference to the need to liaise with the City of London Police. Paragraph B requires that security measures be integrated into the development and the wider area. The City Corporation considers that the emphasis should be on delivering building-related security measures within the building itself, but that developers should also contribute to the design and delivery of area-</p>

	wide security measures and on-street hostile vehicle mitigation, where appropriate and identified within Local Plans.
D11: Fire safety	<p>The City Corporation understands the rationale for the inclusion of a policy on fire safety and the need to ensure that new buildings, particularly tall buildings, are designed to achieve the highest standards of fire safety. However, ensuring fire safety is not deliverable through the planning system. Fire safety provisions in new buildings are set out in Building Regulations and administered and delivered through the Building Control service (either local authority building control or approved inspectors). Building control professionals have expertise and information that makes them better placed to assess fire safety than planners. At planning permission stage there is rarely enough information in the application and submitted plans to make informed decisions on planning conditions regarding fire safety. Over many years, Government has repeatedly emphasised that consenting regimes (such as planning and building control), should avoid overlap wherever possible.</p> <p>Policy D11 should concentrate on those matters which fall directly within the remit of the local planning authority, such as ensuring that access to a building meets the requirements of the emergency services. Although the planning system can encourage designs which deliver the highest standards of fire safety and the submission of information demonstrating how fire safety issues will be addressed within a development (through a Fire Safety Statement), it cannot determine an application on the basis of whether a proposal has provided an appropriate Fire Safety Statement, meets or does not meet building regulations, or enforce the provision of equipment/designs required by building regulations.</p>
D12: Agent of change	This is a new policy which places the responsibility for mitigating the impacts from noise generating activities or uses on the proposed noise-generating development. It also seeks to ensure that established noise generating venues remain viable and do not have unreasonable restrictions placed on them as a result of new noise sensitive development nearby. The overall approach is supported.
D13: Noise	The City Corporation welcomes the inclusion of the specific mention of soundscapes within the policy. Soundscape should be identified as a design principle to be considered at the initial design stage of development proposals to enhance the wider environment of London.
<b>CHAPTER 4: HOUSING</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
H1: Increasing housing supply	The City Corporation supports the Mayor's ambition to see a step change in the level of new housing and affordable housing across the capital. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. However, the City Corporation considers that the policy target of an additional 146 dwellings per year in the City is excessive and could have a detrimental effect on the ability of the City of London to deliver economic and employment

	<p>growth as required by other policies in the draft London Plan.</p> <p>Draft London Plan policies SD4 and SD5 indicate that ‘residential development is not appropriate in the commercial core of the City of London’ and ‘offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ, including other parts of the City of London’. These policies give a clear indication of the important commercial role of the City and the priority that should be given to delivering commercial, particularly office, development in the City in preference to residential. In this context, the housing delivery target in policy H1 is excessive, could undermine the Mayor’s policies for the CAZ and cause harm to the beneficial agglomeration of world leading businesses in the City.</p> <p>The City Corporation is reviewing its own local plan and has undertaken a Strategic Housing Market Assessment to identify the level of housing need in the City over the period 2014-2036. This assessment indicates a need to deliver an additional 126 dwellings per year. In September 2017, Government published a consultation paper ‘Planning for the Right Homes in the Right Places’, which set out an indicative housing need target for each local planning authority in the country, based on a proposed new national methodology. The new methodology suggested that the level of housing need in the City between 2016 and 2026 was 120 dwellings per annum.</p> <p>In light of the policy priority in the draft London Plan for office and commercial development in the City of London in place of residential, the significantly lower assessments of housing need for the City established through the national methodology and the City’s own SHMA, the City Corporation considers that the housing target in Policy H1 for the City of London is too high and should be reduced to a level of 126 dwellings per annum. This reduction is not considered to be strategically significant in terms of total housing delivery across London, but it would help the City of London perform its strategically significant commercial role. The City Corporation will continue to support the delivery of new housing and affordable housing on its own housing estates and other land holdings across London, seeking an appropriate level of contribution to affordable housing from new commercial development within the City.</p>
H2: Small sites	<p>Policy H2 sets out borough level targets for housing development on small sites (under 0.25ha and under 25 homes). For the City of London a target of 74 dwellings per annum on small sites is given. The Mayor’s Strategic Housing Land Availability Assessment sets out the methodology used to identify small site targets and considers 3 approaches – one based on 8 year trends, one based on 12 year trends and a modelled approach which reflects the intensification of development to deliver increased housing across London. The SHLAA (para 6.7) indicates that this modelled approach has been adopted in setting borough level small site targets in the Plan. For the City, however, it appears that the target has been set in relation to the 8 year trend of 74 units pa rather than the</p>

	<p>modelled figure of 71pa or the longer term trend of 63pa. Given the policy emphasis in the Plan that residential development is inappropriate or not a policy priority in the City, it seems perverse to identify a small site target for the City which is greater than that suggested by the modelling which has been used to determine the small site target for the majority of London boroughs.</p> <p>In addition, policy H2 establishes a presumption in favour of small site development in a number of circumstances and requires that boroughs prepare area-wide design codes to positively encourage and promote housing development. A number of exemptions are identified to the presumption in favour of small housing developments, but these do not include the draft London Plan policy priority given to office and other CAZ strategic functions in the City. The policy should be amended to exempt the City of London from the presumption in light of the requirements elsewhere in policies SD4 and SD5.</p>
H3: Monitoring housing targets	The City Corporation welcomes the recognition that non-self contained accommodation for students should count, in part, towards meeting housing targets. H3 indicates a similar approach for shared living schemes. Shared living addresses a different and often less transient sector of the market and the contribution to housing target should be on a one to one basis.
H5: Delivering affordable housing	The emphasis in Policy H5 on the delivery of on-site affordable housing reflects national guidance. Although there is reference to off-site provision or cash in lieu in exceptional circumstances, the City Corporation considers that there should be a greater flexibility over the use of off-site contributions where the London Plan has set other strategic land use priorities, particularly within much of the City of London where draft London Plan policy indicates that residential development is inappropriate.
H6: Threshold approach to applications	Policy H6 provides policy backing for the threshold approach to affordable housing and viability set out in the Mayor's SPG published in 2017. The principle of the policy, setting an affordable housing target and indicating that applications which meet and exceed this threshold will not require viability appraisal, is supported. However, the policy sets a viability appraisal threshold of 35%, which becomes an effective minimum affordable housing requirement for new housing development across London. No account is taken of existing local plan requirements or local evidence of need within individual boroughs. Whilst the City Corporation supports the thrust to increase the level of affordable housing and the inclusion of a strategic target, the London Plan should not set targets for individual boroughs; these should be determined locally in light of local assessments of housing need.
H7: Affordable housing tenure	Policy sets out a London-wide tenure split that should apply to all affordable housing across London. Although the split is informed by the London-wide SHMA, it does not reflect local housing needs and affordable housing tenure requirements at a local, borough level. For example, the City of London SHMA indicates a need within the City for an affordable housing tenure split of 88% social rented and 12 intermediate. The London Plan should enable tenure requirements to be set locally in light of local evidence of need.

H9: Vacant building credit	The policy sets out a London-wide justification for limited application of the vacant building credit in relation to housing, which accords with the approach taken in the City of London. It would be helpful, however, if the policy clarified that the approach to the vacant building credit is also applicable to commercial development.
H10: Redevelopment of existing housing and estate regeneration	The policy approach to estate regeneration is supported, but in concentrating only on tenant rent levels the policy ignores other costs incurred by residents, particularly service charges. Policy H10 should be amended to require that housing replaced through estate regeneration is provided to existing tenants at an equivalent total cost to that currently being incurred, including rent and service charges, in order that it can remain affordable to existing tenants.
H12: Housing size mix	Policy provides detailed guidance on housing size mix, based on the results of the London 2017 SHMA. Although it acknowledges that decision makers should have regard to local evidence, where relevant, the guidance reflects London-wide requirements and offers little flexibility to reflect local evidence of need. The policy needs to give greater weight to the determination of housing size mix in light of local evidence of need.
H15: Specialist older persons housing	Policy requires provision of specialist older persons housing and the plans sets out indicative benchmarks for this provision by borough, with a requirement in the City for 10 units per annum. The City Corporation welcomes the inclusion of separate policy guidance on older persons housing, but the determination of the level of need and setting of targets should be a borough/City responsibility, based on local rather than strategic evidence. For example, the strategically assessed need for older persons housing in the City is 10 dwellings per year, whilst the City Corporation's SHMA indicated a need for 3 dwellings per year.
H18: Large-scale purpose-built shared living	The City Corporation welcomes the policy guidance on shared housing, but the requirement for affordable housing should be determined locally in light of local evidence, rather than having to comply with the London-wide 35% requirement.
<b>CHAPTER 5: SOCIAL INFRASTRUCTURE</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
S1: Developing London's social infrastructure	Sky gardens and upper floor viewing galleries should be recognised as an essential piece of social infrastructure for the City as a whole and also for the resident, working and visitor community which define the City.
S4: Play and informal recreation	<p>The City Corporation supports the emphasis on the provision of play and informal recreation and the requirement to consider this through local plans, but it should be a matter for local determination whether there is a need for a separate strategy on play and information recreation facilities.</p> <p>Not all sites or developments will be able to provide on-site facilities for play and informal recreation of the scale sought in the policy. Provision should be made for these facilities to be provided on alternative sites in the locality or through payments in lieu to the local planning authority to fund provision of facilities within a reasonable distance of the principal development.</p>

S6: Public toilets	The City Corporation welcomes the approach to the provision of publicly accessible toilets within large scale development and the encouragement for the provision of 'Changing Places' toilets. As the Plan indicates, public toilets are a vital facility and are particularly important for many groups. As well as encouraging the provision of facilities in new development, the Policy could usefully provide encouragement to the extension of the community toilet scheme across London, which provides public access to otherwise private facilities.
S7: Burial space	The policy or supporting text should recognise the significance of historic burial grounds and churchyards, their cultural interest and biodiversity role and potential.
<b>CHAPTER 6: ECONOMY</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
E1: Offices	The City Corporation welcomes Policy E1 which supports and promotes office growth across London and specifically recognises that unique agglomeration and dynamic clusters of world class business in the CAZ. Reference to the need to progress Article 4 Directions to remove office to residential permitted development rights is also supported, and is being progressed by the City Corporation in the form of a non-immediate Article 4 Direction to come into effect at the end of May 2019.
E2: Low-cost business space	The City Corporation supports the aim to deliver low cost business space suitable for SMEs, start-ups and other small and growing companies. The analysis underpinning this approach reflects evidence prepared by the City Corporation in March 2016 (Clusters and Connectivity: The City as a Place for SMEs). In taking this policy forward, rather than seeking suitable low cost and flexible space on larger office developments over 2,500 sq m, the policy should instead require that all new office development be designed to be flexible and adaptable to meet the needs of a wide range of businesses and occupiers, including the needs of start-ups and SMEs.
E3: Affordable workspace	<p>The City Corporation supports the aim of ensuring the provision of affordable workspace and the requirement that this be considered and delivered at the local level through Local Plans. Affordable workspace requirements will vary considerably across the capital, and it is not appropriate for the strategic London Plan to impose a definition of affordable workspace applicable to all boroughs.</p> <p>The inclusion of artist studios and designer-maker spaces as specific sectors that have cultural value is welcomed. The Plan could provide clarity that the definition of 'artists studios' could also include rehearsal space for the performing arts and workspaces for wider creative industries, as a positive step that helps ensure a wider range of cultural and creative industries benefit from the provision of affordable workspace.</p>
E4: Land for industry, logistics and services to support London's economic function	The City Corporation welcomes the policy requirement for a sufficient supply of land which can support logistics consolidation and micro-consolidation where the last mile delivery can be by low/zero emission vehicle. Given the growing importance of consolidation to meet London's servicing needs and the requirements in draft policy T7 (A and E), the Mayor should consider whether policy E4 should also require the safeguarding of suitable sites to

	support consolidation.
E5: Strategic Industrial Locations (SIL)	The City Corporation welcomes the specific requirement that provision should be made for storage and logistics/distribution close to central London, consolidation centres and collection points. The provision of off-site consolidation is essential to ensure that significant office development in the City and the wider CAZ can proceed without having a significant adverse impact on transport networks and air quality. The lack of suitable sites within the City and the CAZ means that such provision needs to be considered on a more strategic level.
E8: Sector growth opportunities and clusters	<p>The City Corporation supports the requirement for proactive policies to ensure the availability of suitable workspaces to support London's economic function, specifically meeting the needs of the financial and business services, tech and digital, culture and creative sectors and particularly the need to provide suitable workspaces for culture and creative sectors.</p> <p>In Paragraph D, references to R&amp;D and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be extended to include cultural institutions.</p> <p>Explanatory text, paragraph 6.8.3 could be amended to refer to the potential for interaction between the sectors identified as well as listing sectors.</p>
E9: Retail, markets and hot food takeaways	<p>The City Corporation welcomes the Mayor's continued support for appropriate retail development and London's markets, including specialist markets. However, the City Corporation does not support the restriction on A5 hot food takeaways within 400m of a primary and secondary school in the City. The City Corporation is fully supportive of the wider health agenda underlying this policy and the need to tackle problems of ill health and growing obesity amongst school children, but does not consider that a blanket restriction would be workable within the City, as it would indicate that no further A5 uses should be permitted within the Square Mile, where the primary focus is on meeting the needs of the business community. Furthermore, the City Corporation does not consider that it is appropriate to use planning conditions to restrict the food provided by hot food takeaways to ensure compliance with the Healthy Catering Commitment. The use of conditions to achieve this would be contrary to the 6 tests for planning conditions set out in national Planning Practice Guidance, particularly the requirement that conditions be enforceable, precise and reasonable.</p> <p>The policy should allow for greater local determination of appropriate measures which reflect local circumstances and allow boroughs and the City of London to explore alternative, non-planning measures to address the important aims and objectives of this policy.</p>
E10: Visitor infrastructure	The City Corporation supports the promotion of appropriate visitor infrastructure as set out in this policy and the commitment to conserving, enhancing and promoting London's cultural infrastructure and the recognition of its

	<p>role in attracting visitors to the capital. The Corporation welcomes the statement that serviced accommodation to serve the visitor community in central London should primarily be located within CAZ Opportunity Areas or the City Fringe and that only small scale serviced accommodation should be permitted within the CAZ commercial core in order to maintain the London Plan policy priority for office development within this area.</p> <p>The policy should give an appreciation the kinds of uses deemed essential visitor infrastructure, for example, theatres, public houses and sky gardens/viewing galleries which offer a unique tourist experience. The City of London is at the forefront of delivering an internationally unique cluster of high level viewing galleries which will be accessible and welcoming to all. Examples include 22 Bisphosphate, 6-8 Bishopsgate, 1 Leadenhall Street, 120 Fenchurch Street and 20 Fenchurch Street.</p>
E11: Skills and opportunities for all	The City Corporation supports the strategic approach to the provision of training and skills initiatives and the use of s106 obligations to deliver such initiatives. The City of London Local Plan already provides a framework for using s106 obligations for this purpose.
<b>CHAPTER 7: HERITAGE AND CULTURE</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
HC1: Heritage conservation and growth	<p>The City Corporation welcomes the explicit recognition of the links between heritage and economic growth and vitality, between heritage and social well being and the delivery of culture and the night-time economy. The Corporation also welcomes the requirement for boroughs to develop an evidence base on the historic environment in order to ensure that the historic environment informs development management and other individual proposals.</p> <p>Paragraph A, suggest rewording to emphasise seeking access to and interpretation of heritage assets: ‘..... improving access to and interpretation of heritage assets, landscapes and archaeology within their area.’</p> <p>Explanatory text, paragraph 7.1.11 (last sentence) Add ‘publication’ after dissemination.</p>
HC3: Strategic and Local Views	This policy carries forward existing London Plan policy on strategic and local views and provides the policy framework for the Mayor’s London Views Management Framework SPG. The City Corporation supports this policy, but considers that it could be improved by outlining the importance of collaborative working between boroughs in assessing the implications of development proposals on strategic and local views, particularly collaboration between the development host borough and the borough within which the protected landmark is located.
HC4: London View Management Framework	This policy replicates existing London Plan policy with the exception of an additional requirement to consider the impact of the external illumination of structures in the background of a view. This additional requirement is supported.

	<p>Paragraph B, could be worded more proactively and positively, changing “should not be overly intrusive, unsightly or prominent to the detriment of the view” to “should be of the highest design quality, responding positively to the composition of the view and its constituent landmarks”.</p>
<p>HC5: Supporting London’s culture and creative industries</p>	<p>The City Corporation welcomes and supports this policy which seeks to protect existing cultural clusters and gives explicit policy support for the identification and promotion of new cultural clusters. The policy also supports the use of vacant buildings and public spaces for cultural pop-ups. The approach taken in the policy is supportive of the City Corporation’s joint working with key cultural partners in the north west of the City to develop Culture Mile.</p> <p>The policy also provides the framework for the designation of Creative Enterprise Zones and provides detailed planning guidance for such areas. These CEZs are intended to include existing or emerging areas of creative industries. Where such designations are made, there needs to be sufficient flexibility within the policy to allow for local distinctiveness and for creative industries to respond to local context. The Plan should explore how existing clusters of cultural attraction could house, support, work alongside or be in close proximity to creative enterprise zone clusters and new spaces for the creative industries. This would reflect the interdependency of culture and the wider creative industries, would encourage cross-sector collaboration and create dynamic neighbourhoods.</p> <p>Explanatory text, paragraph 7.5.11 – the Barbican and Culture Mile in the City of London should be added to the list of strategic clusters of cultural attractions.</p>
<p>HC6: Supporting the night-time economy</p>	<p>This policy supports and promotes a 24-hour City, with a focus on the CAZ and key town centres across London, requiring that boroughs develop local strategies for the night time economy. It is noted that the Barbican is identified as a night time area of ‘international or national significance’ (NT1). This is supported and accords with the City Corporation’s vision for the Culture Mile. Cheapside and Liverpool Street PSCs within the City of London are identified as night time areas of ‘more than local significance’ (NT3). In contrast to Policy SD7 and Annex 1, which are very clear about the role of different town centres within the overall London hierarchy, there is a lack of clarity in Policy HC6 and Annex 1 about the policy implications of the three different night-time economy designations. This should be addressed in the final version of the London Plan.</p> <p>The City Corporation suggests that a specific link to the Mayor’s Vision for London as a 24 Hour City should be included and also that the work of the Night Time Commission is both mentioned and commitment is made to build upon its inaugural work.</p> <p>Whilst supportive of the Mayor’s aim to support London’s night time economy to deliver an attractive and</p>

	<p>successful city, the City Corporation considers that reference should also be made to the needs of residents, workers and visitors for periods of quiet and relaxation, particularly between the hours of 11pm and 7am. There should be a policy requirement for boroughs to take account of local context and local sensitivities, particularly in residential areas, when developing and implementing strategies for the night-time economy.</p>
HC7: Protecting public houses	<p>The City Corporation welcomes the protection of public houses. The City of London has a strong heritage of public houses which provide valued facilities for the diverse range of the City community, including residents, workers and visitors.</p> <p>Paragraph C is also welcome in recognising that the re-development of ancillary accommodation can threaten the continued viability and vitality of a public house, for example, by reducing the potential to accommodate live music or sport. The policy should support the better use of ancillary space for complementary use, for example, for dining, for music/performance space or even affordable office accommodation or tourist accommodation, which would support the viability of the host pub.</p> <p>In protecting public houses, the policy should clarify that evidence that a pub has been poorly managed (intentionally or otherwise), should not be taken into consideration when assessing the viability of a pub.</p>
<b>CHAPTER 8: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
G1: Green Infrastructure	Paragraph A should make specific reference to green walls, in addition to green roofs, as these are becoming essential pieces of green infrastructure with a multitude of benefits
G4: Local green and open space	The protection of existing local green and open spaces and the requirement to assess needs and plan for additional space where needed, is supported. The explanatory memorandum should address the potential for green roofs, rooftop amenity spaces or skygardens to contribute towards the provision of amenity space particularly within central London areas such as the City where opportunities for additional local green and open space at ground level are limited.
G5: Urban greening	The City Corporation supports the Mayor's ambition to deliver greater greening of London's buildings and the introduction of the Urban Greening Factor as a mechanism for measuring the delivery of urban greening. The City Corporation is considering the feasibility and viability of adopting higher UGFs for developments within the City as part of the review of the City of London Local Plan. More information on amenity and soil volumes would be welcome as Table 8.2 lacks soil depth guidance.
G6: Biodiversity and access to nature	The City supports the protection of Sites of Importance for Nature Conservation (SINCs) and requirements for the identification of the recognition of further SINCs and areas with deficiency in nature.
G7: Trees and woodland	The approach to trees and woodlands is supported. Further information on tree soil depths and the benefits of

	uncompacted soil and soil support systems would be welcome.
<b>CHAPTER 9: SUSTAINABLE INFRASTRUCTURE</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
SI1: Improving air quality	<p>The new air quality policy is stronger than the previous and gives a greater emphasis on exposure reduction which is welcomed and vital to achieving the reductions in pollution needed to improve health across the city.</p> <p>Further clarification or amendment would be helpful in several parts of the policy:</p> <ul style="list-style-type: none"> <li>• Paragraph A (1)(d), clarification is needed on what is classed a ‘high levels of exposure’ and ‘unacceptable risk’. This could be an opportunity to be more specific in preventing further exposure, for example, of children by including a point stating that new schools should not be within x metres of a main road.</li> <li>• Paragraph A (2), reference to Air Quality Focus Areas should instead be Air Quality Management Areas, or boroughs’ own Focus Areas. For example in the City of London, the designated Focus Areas are not the main areas of concern for the authority. The GLA’s Focus Areas in the City are along main TFL roads which have very little residential exposure. The City is determining our own Focus Areas which will be centred around the areas of residential development.</li> <li>• Paragraph A (3), agree that Air Quality Neutral Assessment needs to be taken further, but further guidance would be required to explain exactly what ‘Air Quality Positive’ would be and how it would be assessed and also the definition of ‘large scale’ development to which the policy would apply. Could the ‘Air Quality Positive’ approach be used to reduce emissions associated from deliveries? Large scale office developments that are car free often escape the AQNA as they are technically car free however they have a large number of vehicle trips associated with them through servicing and deliveries. We would also welcome consideration of how having an extra assessment to complete could put extra burden on both applicants and Local Authorities reviewing applications. An alternative (or extra) approach could be to improve the existing Air Quality Neutral Assessment by reducing the benchmarks as it is evidenced through numerous applications both here and in neighbouring boroughs, that it is possible to meet lower emissions requirements.</li> <li>• Paragraph A (4), inclusion of the NRMM policy in the main body of the policy is welcomed. However it would be better if this could be legislated and we would encourage and support the GLA’s endeavours to do this.</li> <li>• Paragraph A (5), agree that AQA’s should be submitted with all Major Developments however including the exception of developments that can demonstrate that their emissions are less than the previous use may exclude developments that have low emissions but are adding additional exposure to an area of existing poor air quality. This exception should be removed.</li> </ul> <p>In addition, the City Corporation has several comments on the supporting text to this policy:</p>

	<p>9.1.4 The requirement for developments to carry out an initial Air Quality Assessment prior to starting the design process to determine suitable land uses for the site is very useful in reducing exposure, for example for preventing applications for new schools on the sides of very busy polluted roads.</p> <p>9.1.6 The instruction to include the impacts from generator emissions in AQA's is welcomed as the City Corporation has high levels of developments including large generators.</p>
SI2: Minimising greenhouse gas emissions	<p>The first sentence of this policy states that "Major development should be net zero carbon" however it is not clear how embodied carbon should be taken into account in the assessment of net zero carbon. The policy goes on to say that". This means reducing carbon dioxide emissions from construction and operation...". Previous definitions of zero carbon apply to regulated carbon emissions during the operational phase of the building whereas this wording implies that reductions in emissions during the construction phase could be included in the zero carbon assessment. The supporting text paragraph 9.2.10 (k) requires that "proposals to minimise embodied carbon" should be included in the energy strategy, which further confuses the intention of this policy.</p> <p>The accompanying London Plan viability study deals with the impact of the zero carbon target on development across London as a whole. Whilst the study looks at the implications of zero carbon in operation, it does not appear to address the implications of zero carbon construction on development viability. Further information is needed within the Plan to demonstrate that the zero carbon in construction requirement is both feasible and viable.</p> <p>The issue of embodied carbon is important and the City Corporation welcomes its inclusion, however embodied carbon should be addressed via a separate policy or at least a separate part of policy SI2. Further guidance as to the methodology for assessing embodied carbon should be published alongside the London Plan.</p> <p>There is very little mention of the conflict between energy policies and air quality impacts. Commercial gas accounted for 30% of NOx emissions in the City in 2013 (LAEI 2013) and this proportion is set to increase as traffic emissions reduce. Care must be taken to ensure the Zero Carbon policy does not undermine the air quality policy and that the resulting energy efficiency measures are mutually beneficial to both carbon emissions and local air pollution emissions.</p>
SI3: Energy infrastructure	<p>Smart meters, smart grids and local micro grids are referred to in the supporting text for policy SI2 but are not included in policy SI3. Smart energy infrastructure will become increasingly important as a means of demand management in future and this should be reflected in policy SI3 (B). The initial focus of energy masterplans should</p>

	<p>be on demand management therefore policy SI 3 (B) should be amended to include the identification of “Opportunities for demand management through smart energy infrastructure”.</p> <p>SI3 D includes the heating hierarchy for communal heating systems in major developments which gives a clear instruction that non-polluting heating systems should be considered before selecting CHP, but only in areas of ‘Heat Network Priority’. This policy should apply to all AQMA’s too.</p> <p>Paragraph D (2), stating that CHP/Boiler systems should be designed to ensure that there is no significant impact on local air quality, is welcomed.</p> <p>In the City Corporation’s response to the above proposal in the Draft Environment Strategy we stated – ‘We welcome proposals for a hierarchy of energy systems that contribute towards improving air quality. We also welcome additional action to minimise emissions from gas fired combined heat and power plant, which can lead to very high local levels of nitrogen dioxide. We would like to see a detailed assessment of options for future gas fired combined heat and power plant to inform policy in the London Plan. This should ensure that both local air quality is protected, and opportunities are not lost for carbon gains from combined heat and power plant in appropriate locations. This assessment should look in detail at existing options for abatement, how effective they are and how abatement may be developed in the future.’ This response is reiterated and remains the case for this consultation.</p> <p>Generators are not mentioned in the policy. Air quality impacts from generators should be considered and guidance could be given on less polluting alternatives and against using backup diesel generators for Short Term Operating Response and other demand side response in areas of high pollution, as per the draft LES proposal 4.2.3d. Guidance on testing and maintenance of generators to reduce emissions and less polluting alternatives should be included in the Energy Planning Guidance document.</p>
SI5: Water infrastructure	<p>The City Corporation welcomes the emphasis in this policy on water conservation measures. BREEAM Excellent standard only requires one mandatory credit in the water section. To achieve high standards of water conservation for commercial development SI5 C (2) could be strengthened by requiring the maximum feasible BREEAM credits for the water section. Similarly, SI5 C (3) could be strengthened by “requiring” water saving technologies rather than just “encouraging” them.</p>
SI6: Digital connectivity infrastructure	<p>The inclusion of a specific policy on digital connectivity is welcomed, but the policy should be strengthened to provide a clear direction of travel and requirements for the delivery of digital connectivity within buildings and outside buildings. In particular, the policy should support the use of the standardised wayleave toolkit produced by</p>

	the City Corporation.
SI7: Reducing waste and supporting the circular economy	<p>The City Corporation welcomes the emphasis on the circular economy in the draft London Plan. A key component of successful circular economies is the emphasis on sharing and providing goods as a service. This can be encouraged through design of buildings and the public realm. For example the inclusion of shared kitchens in commercial developments reduces reliance on take away facilities which generate more waste; the provision of cycle hire space encourages more efficient sharing of bikes. The principle of designs which encourage sharing should be included in this policy.</p> <p>Although the policy addresses all forms of waste and promotes circular economy principles, the explanatory memorandum could usefully include guidance on measures to reduce the use of plastics and reduce plastic waste in London, reflecting the recently announced UK Government ambition to eliminate avoidable plastic waste by 2042.</p>
SI8: Waste capacity and net waste self-sufficiency	<p>The City Corporation welcomes the adjustment in the City of London's waste apportionment target from the current 2016 London Plan. Paragraphs 9.8.6 and 9.8.7 encourage boroughs to pool apportionment requirements where insufficient capacity exists within a borough to meet the Mayor's target. The Mayor should provide further guidance and support to boroughs on how such pooling can be achieved to ensure that the overall target of net waste self-sufficiency across London is met.</p> <p>Policy SI8 B(3) (a) indicates that suitable locations should be identified to manage borough waste apportionments include waste transfer facilities. It is not clear what evidence would be required to allow boroughs to identify waste transfer sites as suitable sites to contribute to their waste apportionments. Additional guidance on this could be included in paragraph 9.8.4.</p>
SI12: Flood risk management	Paragraph 9.12.4 should be amended to make it clear that Lead Local Flood Authorities have a duty to prepare Local Flood Risk Management Strategies which in most cases will encompass any requirement to address flood risk management in the vicinity of the River Thames thereby negating the need for separate flood related Riverside Strategies.
SI15: Water transport	<p>SI15 C this proposal should be considered as 'increase in the amount of freight transported by river, where it reduces road borne transport'. The City Corporation's Freight and Servicing SPD includes a statement to this effect 'use of low emission river transport for goods and waste is strongly encouraged', where it reduces road borne transport</p> <p>SI15 D/F/G – should have regard to where in some locations riverside use by pedestrians and cyclists may also be a high priority, and therefore aim to balance access demand, or at least have regard to potential demand in decision</p>

	<p>making; it may be possible to design use of the wharf front so that cycle access is also possible, with only some timed limited restrictions.</p> <p>There needs to be reference to the London Port Health Service as one of the critical agencies along with the PLA in positively encouraging and effecting change/improvement on and around the tidal River.</p>
SI16: Waterways – use and enjoyment	The City Corporation supports the policy to link towpaths to existing transport network, specifically for better cycle and walking links.
<b>CHAPTER 10: TRANSPORT</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
Chapter 10 – general comments	The City Corporation supports the Mayor’s approach which seeks to rebalance the transport system towards walking, cycling and public transport and policies which support the Mayor’s Transport Strategy.
T1: Strategic approach to transport	The City Corporation supports the approach which seeks to rebalance the transport system towards walking, cycling and public transport, implement the Mayor’s Transport Strategy (which the City Corporation has already commented on and supported) and deliver an improvement in Air Quality across London.
T2: Healthy Streets	The City Corporation supports the Healthy Streets approach as set out in the Mayor’s Transport Strategy and, in particular paragraph D which seeks to reduce the dominance of vehicles on London Streets. The incorporation of air quality indicators into transport plans through the Health Streets indicators, as with the MTS, is welcomed.
T3: Transport capacity, connectivity and safeguarding	<p>The City Corporation welcomes the approach to safeguarding of existing land and buildings used for transport, particularly paragraph B (3) which safeguards land for the Walk London network, and access to and along the Thames.</p> <p>The Corporation also supports paragraph B (2) which seeks to identify and safeguard new sites and route alignments for priority transport investment. The Mayor should, however, consider whether there is a need to extend this safeguarding to ensure that opportunities for development, particularly housing development, can be realised in appropriate locations along routes and transport nodes, to support the business case underpinning major new transport investment proposals, such as Crossrail 2.</p>
T5: Cycling	The City Corporation supports the Mayor’s approach to encourage an increase in cycling across London, including the provision of suitable levels of cycle parking within new development for both long stay and short stay visitors. However, the Corporation considers that there should be flexibility for boroughs and the City Corporation in the application of these parking standards, in light of locally specific or building specific constraints and where a robust and evidenced case for variation in standards has been made, such as the application of the B1 standard of 1 space per 75 sqm within office towers in the City’s Eastern Cluster.
T6: Car parking	The City Corporation welcomes the Mayor’s confirmation that new development in areas of high public transport

	accessibility should be car free and the requirement to provide infrastructure for Electric and Low Emission vehicles, in line with Mayor's proposal to implement ULEZ in 2019.
T6.4: Hotel and leisure uses parking	The City Corporation notes the approach to hotel parking in the CAZ (paragraph A) which limits parking to operational needs, disabled parking, taxis/coaches and necessary servicing vehicles. The Corporation requests that these standards be applied flexibly recognising, for example, that within the City of London, the adopted Local Plan does not permit on-site coach parking for hotels.
T6.5: Non-residential disabled persons parking	The City Corporation welcomes the provisions and guidance for non-residential disabled persons parking
T7: Freight and servicing	<p>The City Corporation welcomes provisions within the policy which seek to reduce freight trips and reduce emissions from freight, whilst recognising the need to allow business to continue to operate efficiently. This approach is in line with the City of London's Freight and Servicing SPD.</p> <p>The City Corporation particularly welcomes and supports the encouragement of consolidation and micro-consolidation particularly where onward distribution is by sustainable mode, such as cycle or small electric vehicle. Such consolidation will be essential to enable further office and commercial development within the CAZ whilst minimising the need for additional servicing and deliveries. Consolidation centres are also sensible for air quality/congestion management reasons but again need to be considered (and therefore referenced) for noise/acoustic design (D12/13).</p> <p>Construction logistics plans need to be considered as part of the whole environmental impact for developments and should be specifically mentioned in the (good) design policies especially D12 and D13 at least.</p>
T8: Aviation	The City Corporation welcomes the Mayor's acknowledgement of the need for additional aviation capacity in the south east of England and the support for the role of London's airports in enhancing London's spatial growth. The City Corporation has, for a number of years, supported an increase in airport capacity in the South East of England to assist in maintaining the City of London's pre-eminent position as a leading financial centre. Growth in airport capacity is also essential for the creation of jobs and growth across wider London and the rest of the UK.
T9: Funding transport infrastructure through planning	The City Corporation notes the Mayor's intention to use MCIL to secure funding towards strategic transport infrastructure, such as Crossrail. The City Corporation has responded to the Mayor's consultation on the MCIL2 Draft Charging Schedule and seeks a commitment from the Mayor to engage with boroughs and the City Corporation on MCIL spending priorities.
<b>CHAPTER 11: FUNDING THE LONDON PLAN &amp; CHAPTER 12: MONITORING</b>	
<b>LONDON PLAN POLICY</b>	<b>CITY CORPORATION COMMENT</b>
DF1: Delivery of the Plan and	The City Corporation supports the emphasis in this policy on the need for developers to take full account of

Planning Obligations	planning policy requirements when purchasing land or buildings. The Corporation suggests that the policy could usefully be improved by clarifying the expectation that site specific viability appraisals will be placed into the public arena as part of the planning application process to enable wider scrutiny of developer proposals.
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