



## **Policy and Resources Committee (Supplementary Pack)**

**Date:** THURSDAY, 22 FEBRUARY 2024

**Time:** 1.45 pm

**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

8. **CITY PLAN 2040**

**For Decision**  
(Pages 3 - 624)

**Ian Thomas CBE**  
Town Clerk and Chief Executive

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## **City Plan 2040**

### **Changes made from the City Plan 2036 (produced March 2021) to the City Plan 2040**

This document summarises the main changes made to each chapter and policy of the City Plan, comparing the version published in March 2021 for the first Regulation 19 consultation to the revised submission version, known as City Plan 2040.

#### **Chapter 1 – Introduction**

1. This chapter has been deleted from the plan. It contained background information on why a local plan is being produced, the stages the plan has been taken through, the broad policy context, and summarises the structure of the plan. Some of these are important pieces of information to retain but they do not need to be at the start of the document; they are rarely looked at in the day-to-day use of a local plan. They will be revised, summarised and contained in an appendix.

#### **Chapter 2 – The City Today**

2. This chapter has been deleted from the plan. It contained a series of infographics setting out the key stats about the Square Mile, such as the amount of jobs, residents, size of open spaces, etc. Providing a static snapshot of this information, which will date rapidly, is potentially misleading. Instead, the planning department are producing new, digital approaches to monitoring that will provide better and more meaningful data about the City, updated regularly and providing historic time series wherever possible.

#### **Chapter 3 – Vision, Strategy and Spatial Objectives**

3. This chapter has been reformatted and revised extensively. The previous version used the framing of the City Corporation's corporate plan 2018-2023, which is in the process of being replaced. For each of the three corporate plan aims, there was a vision for the Square Mile and a strategic objective. A vision was also set out for each Key Area of Change. A spatial strategy set out a series of 11 further objectives for the Plan.
4. In the refreshed version, this approach has been simplified and revised, and updated to comply with the Planning and Compulsory Purchase Act 2004 (as amended by the Neighbourhood Planning Act 2017), which requires local planning authorities to identify the strategic priorities for the development and use of land in the authority's area. A series of strategic priorities have been set out, grouped together under the three sustainable development objectives set out in the National Planning Policy Framework (NPPF). These strategic priorities have been informed by the objectives set out in the spatial strategy of the first proposed submission version of the plan, as well as other corporate strategies

such as the Transport Strategy, and (like everything in the revised Plan) have been informed by evidence and stakeholder engagement.

5. A new spatial strategy has been added. This focuses on those aspects of the plan that have a spatial dimension, such as where tall buildings should be located and where new housing will be focussed.

### **Policy Changes**

6. Almost all policies have been amended, however many amendments are relatively minor in scope. The amendments are summarised for each policy below.

### **Health, Inclusion and Safety**

#### *Strategic Policy S1: Healthy and Inclusive City*

7. This is a strategic policy setting out how the City and development in the Square Mile should contribute to improving health and inclusion. References have been added to enabling communities to access opportunities for employment as well as sports provision (alongside other opportunities). A requirement has been added for development to take inclusive approaches to design. These changes reflect responses received during the previous Regulation 19 consultation in 2021 and informal engagement in 2023.

#### *Policy HL1: Inclusive buildings and spaces*

8. The main changes are amendments to fully reflect all of the protected characteristics, in line with the Equality Act; a requirement for major development to submit an equality impact assessment; and a requirement for development to promote the achievement of equity, diversity and social inclusion.
9. Supporting text has been updated to reflect these changes and to highlight how inclusive design can take neurodiversity into consideration.

#### *Policy HL2: Air quality*

10. A change had been made prior to the Local Plan sub committee regarding the use of diesel generators. This has been subsequently reverted to the original approach, with supporting text amended.

#### *Policy HL3: Noise*

11. This policy previously covered both noise and light pollution. A separate design policy (DE9) covered lighting. In order to simplify the plan, and to reflect the increased emphasis on lighting as a result of the City Corporation's lighting



charter and Lighting SPD, the lighting aspects of HL3 have been merged into policy DE9.

12. The policy wording regarding noise has been clarified to distinguish between new noise-generating uses and the potential impacts of existing noise-generating uses on proposed development, with reference to the 'agent of change' principle added in relation to the latter. A requirement has been added for developers to explore opportunities to enhance the acoustic environment.

*Policy HL4: Contaminated land and water quality*

13. No changes have been made to the policy.

*Policy HL5: Location and protection of social and community facilities*

14. The policy has been amended to ensure that any replacement facilities are equivalent to those being replaced. The requirement for new facilities to not prejudice the business city has been removed from this policy, as it is adequately addressed under policy OF2.

*Policy HL6: Public toilets*

15. The policy has been amended to ensure facilities are provided for different types of users, including the provision of 'changing places' facilities, and the need for visible signage.

*Policy HL7: Sport and recreation*

16. The policy has been amended to reflect the City Corporation's aims to support a greater sport and recreation offer, and the creation of a network of facilities across the Square Mile.

*Policy HL8: Play areas and facilities*

17. The policy has been amended to seek additional play facilities in appropriate locations, and to ensure play facilities are designed inclusively. This issue arose during public engagement, particularly in relation to the need in and around residential areas.

*Policy HL9: Health impact assessments (HIA)*

18. The requirements of the policy have been tightened to ensure that all major development undertakes an HIA. Previously, this only applied to some, with

other forms able to carry out a checklist; in practice, developers are already complying with the requirement for rapid or full HIAs.

*Strategic Policy S2: Safe and Secure City*

19. The policy has been amended to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

*Policy SA1: Publicly accessible locations*

20. The name of the policy has been amended from 'crowded places', to reflect more up to date terminology.
21. to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

*Policy SA2: Dispersal routes*

22. No substantial changes to the policy.

*Policy SA3: Designing in security*

23. The policy has been amended to mention 'secured by design' principles and to give further advice on how hostile vehicle mitigation should be designed.

**Housing**

*Strategic Policy S3: Housing*

24. The housing requirement for the Plan has been updated to reflect both the London Plan (up to 2029) and the requirement for housing beyond this period set out in national policy.
25. An additional clause has been added that seeks to prioritise specific forms of housing in residential areas, as these reflect the majority of the City's housing need, as identified in the Strategic Housing Market Assessment. This also responds to issues raised during consultation, where respondents living in residential parts of the City were keen to ensure residential areas and the services, amenities and character of those areas were strengthened.

*Policy HS1: Location of new housing*

26. The relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to support a mix of cultural and community uses in residential areas (amongst other uses), reflecting responses received during informal engagement.

*Policy HS2: Loss of housing*

27. The supporting text has been amended to provide guidance on those situations where amalgamation of housing units might be acceptable.

*Policy HS3: Residential environment*

28. Reference to the lighting policy (DE9) has been added.
29. Reference to the agent of change principle has been removed from this policy, as it isn't directly applicable and is covered more clearly elsewhere in the plan.

*Policy HS4: Housing quality standards*

30. The relationship of the policy to London Plan residential standards has been clarified.

*Policy HS5: Short term residential letting*

31. No substantive changes to the policy.

*Policy HS6: Student accommodation and hostels*

32. The policy has been amended to require high design and amenity standards and good connections to educational institutions. Supporting text has been amended to refer to GLA guidance on accessible accommodation, and to advise developers to liaise with local residents and businesses.

*Policy HS7: The Temples*

33. The policy has been moved to chapter XX (see below).

*Policy HS7: Older persons housing*

34. The housing target for older persons housing has been amended, in line with the requirements of the SHMA.

*Policy HS8: Self and custom build housing*

35. No changes to the policy.

**Offices**

*Strategic Policy S4: Offices*

36. The target for office floorspace has been amended to reflect the recent evidence in the City Corporation's future of offices study, with an aim to provide a minimum of 1.2m square metres of additional office floorspace over the lifetime of the City Plan.
37. The policy has been amended to promote the retrofitting and upgrading of existing office buildings, reflecting responses received during recent informal public engagement.

*Policy OF1: Office development*

38. The policy has been amended to promote retrofitting, wellbeing and circular economy design approaches, reflecting consultation responses received during public engagement. Supporting text has been updated to provide guidance on the functioning and design of office lobbies as places that can contribute to the life of the City.

*Policy OF2: Protection of existing office floorspace*

39. The policy has been substantially amended, to provide clarity on the situations in which the loss of office floorspace would be acceptable. The first part of the policy sets conditions that all such applications would need to meet. The second part sets out four routes for development, provided they meet the first part of the policy. These routes include the 'retrofit fast track', which was explored during public engagement. The other three routes were already set out in the previous version of the policy but have been reworded for clarity.

*Policy OF3: Temporary 'meanwhile' uses*

40. The policy has been amended to encourage meanwhile uses, and to require major development that would affect existing retail units to set out how they would maintain active uses in these units prior to redevelopment. This was an issue raised during public engagement.

## **Retail**

### *Policy S5: Retail and active frontages*

41. A clearer strategic direction to diversity and making retail areas more vibrant, including through partnership working, has been added to the policy. This reflects issues raised during public engagement, particularly in relation to areas such as the Fleet Street Principal Shopping Centre. It also responds to Destination City.
42. The 'retail links' have been removed from the plan, with greater support for the retention and encouragement of a broader range of 'active frontage' uses across the Square Mile.
43. The policy now encourages the opening of retail and other uses in the evenings and weekends, reflecting the City Corporation's Destination City vision.

### *Policy RE1: Principal Shopping Centres*

44. No substantive changes to the policy. The wording of policy has been clarified.
45. The sections setting out the strategic approach for each of the four PSCs has been amended in response to recent evidence and public engagement.

### *Policy RE2: Retail links*

46. This policy has been deleted, with a more consistent and clear approach to active frontage uses set out in policy RE3.

### *Policy RE2: Active frontages*

47. This policy was previously titled 'Ground floor retail provision elsewhere in the City'. The policy has been amended to encourage a broader range of retail and related uses across the City, and to resist the loss of active frontages. This responds to the City Corporation's Destination City vision and recent evidence of retail demand.

### *Policy RE3: Specialist retail uses and clusters*

48. This policy has been expanded in response to recent evidence of retail demand, seeking to ensure that retail provision in different parts of the City responds to its context and character.

#### *Policy RE4: Markets*

49. This policy has been amended to more positively support markets, recognising that they have the capacity to enhance existing retail areas, not simply have an adverse impact on them. This responds to an issue raised during recent informal public engagement.

### **Culture and visitors**

#### *Strategic Policy S6: Culture and Visitors*

50. This policy has been substantially amended, in response to the City Corporations Destination City vision and the strategic priority to transform the Square Mile as a leading leisure and cultural destination.

#### *Policy CV1: Protection of existing visitor, arts and cultural facilities*

51. No substantive changes to the policy.

#### *Policy CV2: Provision of Arts, Culture and Leisure Facilities*

52. This is a new policy, reflecting the City's vision for culture and leisure in the Square Mile. It seeks to encourage new provision of arts, culture and leisure facilities by requiring on-site facilities from very large scale development and provision (either on site, off site, or through contributions) from all major development.
53. This approach will be informed by the new cultural planning framework, which will set out focal areas for cultural provision across the Square Mile.
54. This issue was discussed during the recent informal public consultation, with respondents seeking to ensure that culture and leisure facilities were inclusive and accessible for all.

#### *Policy CV3: Provision of visitor facilities*

55. No substantive changes to the policy.

#### *Policy CV4: Hotels*

56. The policy relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to require provision of active uses at ground floor level in new hotel development, and to ensure hotels come

forward in suitable locations. Supporting text has been updated to reflect the hotel demand identified in recent evidence.

*Policy CV5: Evening and night time economy*

57. The policy has been amended to refer to the agent of change principle.

*Policy CV6: Public art*

58. No substantive changes to the policy. Wording has been amended to ensure inclusive terms are used in reference to disabled people.

**Infrastructure**

*Policy S7: Infrastructure and utilities*

59. This policy has been amended to refer to the importance of infrastructure in planning for a net zero City. The City Corporation's Utility Infrastructure Strategy has been referenced in supporting text.

*Policy IN1: Infrastructure provision and connection*

60. Minor changes have been made to policy to allow more flexible approaches to applications and to encourage innovative solutions to facilitate network connections.

*Policy IN2: Infrastructure Capacity*

61. No substantive changes have been made.

*Policy IN3: Pipe subways*

62. No substantive changes have been made.

**Design**

*Strategic Policy S8: Design*

63. This policy has been extensively revised, clarifying approaches to sustainable design, site capacity and vibrancy. Biodiversity has been added to the policy, as has consideration of health for design approaches. The need for stakeholder engagement has been highlighted.

*Policy DE1: Sustainable design*

64. This policy has been extensively revised, setting out the new 'retrofit first' approach and the need to follow the City Corporation's Carbon Options Guidance, an issue that was explored during the recent informal public engagement and raised during the previous Regulation 19 consultation.
65. Parts of policy CE1 (Zero waste design) that relate to circular economy design approaches have been moved into this policy, as they are more relevant in this location.

*Policy DE2: Design quality*

66. The policy has been amended to ensure new development provides inclusive spaces, active frontages, and greening, and the need for community engagement. Supporting text has been updated.

*Policy DE3: Public realm*

67. The policy has been extensively amended to reflect numerous aspects of how public realm can contribute to the built and natural environment, including green infrastructure, public art, seating, and other features. The need for inclusive and accessible public realm has been emphasised in the policy and expanded. The need for high quality public realm was identified during public consultation, particularly in relation to Key Areas of Change.
68. Supporting text has been updated in line with the refreshed policy approach.

*Policy DE4: Pedestrian permeability*

69. The policy has been merged with policy AT1, to avoid repetition and improve clarity. The policy has been deleted from this location.

*Policy DE5: Terraces and viewing galleries*

70. The functioning of policy requirements for roof terraces and viewing galleries has been strengthened, with additional reference to complementary cultural and leisure facilities to create a mixture of destinations.

*Policy DE6: Shopfronts*

71. Minor amendments to the policy have been made to emphasise the need to create active frontages and consider the use of awnings.



*Policy DE7: Advertisements*

72. Minor changes to the policy have been made to support flags and banners where appropriate for cultural institutions, and the use of advertisements associated with one-off events in the City.

*Policy DE8: Daylight and sunlight*

73. The policy has been amended to refer to a broader range of sensitive receptors that could be impacted by loss of daylight or sunlight, and to refer to daylight and sunlight levels in historic interiors.

*Policy DE9: Lighting*

74. The broad thrust of the policy remains, however it has been amended in line with the approach set out in the City Corporation's Lighting SPD and best practice.

**Transport**

*Strategic Policy S9: Transport and servicing*

75. Minor changes have been made to the policy to reflect current approaches on the restriction of on-street parking.

*Policy VT1: The impacts of development on transport*

76. This policy has been revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

*Policy VT2: Freight and Servicing*

77. Minor changes have been made to the policy, including reference to the use of servicing lifts in appropriate locations.
78. Wording in the policy has been clarified around servicing hours and sustainable deliveries.
79. revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

*Policy VT3: Vehicle servicing and parking*

80. Reference to the use of under utilised car parks as last mile delivery hubs has been removed, however support for their alternative transport uses has been retained.

*Policy VT4: River transport*

81. This policy has been amended to give greater emphasis to river-based transport of people and freight, and to resist permanent moorings of vessels, in line with the aim to create a more inclusive, welcoming and vibrant riverfront.

*Policy VT5: Aviation Landing Facilities*

82. No changes have been made to this policy.

*Strategic Policy S10: Active Travel and Healthy Streets*

83. The policy has been amended to reflect the recently updated Transport Strategy, including placing increased emphasis on inclusion and prioritising the needs of people walking and wheeling. Explicit reference to the healthy streets approach has also been added to the policy.

*Policy AT1: Pedestrian Movement, Permeability and Wayfinding*

84. This policy has been amended to reflect the requirements of policy DE4, which set out closely related policy requirements.
85. An addition to the policy has been made in relation to the need to improve wayfinding through a variety of means.

*Policy AT2: Active Travel including Cycling*

86. A reference has been added to the London cycling design standards. Supporting text advises that accessible shower and changing facilities should be provided in appropriate new development.

*Policy AT3: Cycle Parking*

87. This policy has been amended to require cycle parking to be conveniently located, easily accessible, safe and secure. Supporting text has been amended

to advise that a proportion of cycle parking spaces should flexibly provide storage and charging for e-bicycles and mobility scooters.

## **Heritage and Tall Buildings**

### *Policy S11: Historic Environment*

88. This policy has been extensively altered. Additional emphasis has been placed on the need to celebrate the City's heritage and promote public enjoyment of historic spaces and buildings in ways that are inclusive and accessible. The policy encourages heritage-led placemaking, the retrofit of historic buildings and collaboration between heritage sites and other adjacent developments. The need to adequately protect the City's heritage was raised during both the Regulation 19 and informal public engagement, and these responses have informed the policy direction.

### *Policy HE1: Managing Change to the Historic Environment*

89. The policy has been amended to require submission of statements of significance and heritage impact assessments. Specific wording has been added to reflect the wording of national policy in relation to heritage harm.

90. An additional requirement has been set out in policy for developments to conserve and enhance the immediate setting of Bevis Marks Synagogue and The Monument; issues relating to the former were raised extensively during the Regulation 19 consultation and flagged during the recent informal public engagement.

91. Supporting text has been extensively revised to reflect these changes and best practice in conservation.

### *Policy HE2: Ancient Monuments and Archaeology*

92. The policy has been amended to require artefacts or deposits to be preserved in-situ.

### *Policy HE3: Setting of the Tower of London World Heritage Site*

93. The policy has been amended to reflect requirements for heritage impact assessments, and for development in the area to contribute to pedestrian and cycle routes, including through wayfinding improvements.

### *Strategic Policy S12: Tall Buildings*

94. The policy has been extensively amended, reflecting the approach required to comply with the London Plan and recent evidence in relation to character areas and tall building areas.
95. The first part of the policy gives a definition for tall buildings in the City. The next few sections set out design policies. The policy also sets out where tall buildings would be appropriate, and how developments should identify appropriate heights for tall buildings. Supporting text has been updated accordingly.

*Strategic Policy S13: Protected Views*

96. A minor amendment to the policy has been made to require development to have regard to views of the City that have been designated by other local planning authorities.
97. Extensive additions have been made to the supporting text to reflect the operation of St Paul's Heights as set out in the Protected Views SPD.

**Open Spaces and Green Infrastructure**

*Strategic Policy S14: Open Spaces and Green Infrastructure*

98. A minor amendment has been made to the policy to reference the green corridors that have been identified to link up the City's Sites of Importance for Nature Conservation (SINC).
99. Supporting text has been revised to more clearly set out the importance of open spaces and green infrastructure in the Square Mile.

*Policy OS1: Protection and provision of open spaces*

100. The broad approach in the policy remains as previously but wording has been revised to provide additional clarity and to emphasise the need for inclusive, accessible public open spaces. Supporting text has been revised to more clearly set out the importance of inclusive and welcoming open space.

*Policy OS2: Urban greening*

101. Minor changes have been made to the policy to emphasise the need for maintenance of green features. Supporting text has been shortened and clarified, with reference to new London Plan guidance on urban greening added.

*Policy OS3: Biodiversity*

102. Minor changes have been made to the policy to recognise that green walls may not be appropriate ways to increase biodiversity in all cases. The policy has been amended to ensure it supports appropriate pollinators in the City. Supporting text has been revised to reference the City Corporation's Biodiversity Action Plan.

*Policy OS4: Biodiversity Net Gain*

103. This is a new policy, reflecting the imminent requirement set out in legislation for development to provide net gains in biodiversity. Because of the existing low levels of biodiversity in the City, a more relevant approach seeking absolute increases (rather than a percentage uplift) has been set out in policy, supported by recent evidence.

*Policy OS5: Trees*

104. A minor amendment has been made to refer to the green routes that have been identified to link up the City's SINC's.

**Climate Resilience**

*Strategic Policy S15: Climate resilience and flood risk*

105. A requirement has been added for development to contribute to wider climate resilience measures. The timeline for raising flood defences has been brought forward, in line with recent evidence.

*Policy CR1: Overheating and Urban Heat Island Effect*

106. No amendments have been made to the policy.

*Policy CR2: Flood risk*

107. No amendments have been made to the policy (other than typographical changes).

*Policy CR3: Sustainable Drainage Systems (SuDS)*

108. No amendments have been made to the policy (other than typographical changes).

*Policy CR4: Flood protection and flood defences*

109. No amendments have been made to the policy. In supporting text, the timeline for raising flood defences has been brought forward, in line with recent evidence.

## **Circular Economy and Waste**

### *Strategic Policy S16: Circular Economy and Waste*

110. No amendments have been made to the policy (other than typographical changes). The London Plan apportionments have been updated in supporting text to most recent London Plan.

### *Policy CE1: Zero Waste City*

111. The policy has been split and merged into policy DE1 (Sustainable Design) and policy CE2 (renumbered CE1 - Sustainable Waste Facilities and Transport).

### *Policy CE1: Sustainable Waste Facilities and Transport*

112. No amendments have been made to the policy. Part of previous policy CE1 (Zero Waste City) and relevant supporting text have been incorporated into this policy.

### *Policy CE3: New waste management sites*

113. A minor clarification has been made to the policy to be clear that the relevant part applies to waste facilities that generate energy from waste.

## **The Temples, the Thames Policy Area, and the Key Areas of Change**

### *Policy TP1: The Temples*

114. This is a new policy, replacing the previous Temples policy (HS7). It better reflects and seeks to support the functioning of the Temples as places of learning, training and collegiate facilities alongside housing and workspaces for barristers and students. The previous policy sought to retain a balance between housing and workspaces in the area; this approach no longer reflects the optimal functioning of the area as a place to support the legal profession.

115. The policy also recognises the important historic character of the Temples, encourages sensitive adaptation and accessibility improvements, and seeks opportunities to encourage improvements to the public realm and open spaces.

*Strategic Policy S17: Thames Policy Area*

116. The policy has been amended to emphasise the need for additional inclusive public space along the riverfront. Clarification has been given in respect of moored vessels. Supporting text has been shortened and repetition removed.

*Strategic Policy S18: Blackfriars*

117. The policy has been amended to support the provision of an eastern entrance to Blackfriars Station, providing access to the riverfront. Encouragement has also been given to provision of sport, leisure or recreation facilities for the area below the Blackfriars undercroft. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S19: Pool of London*

118. The updated policy aims to make the most of opportunities to provide ample public open spaces along the Thames riverfront, enhance pedestrian access, and optimize the use of heritage assets, with the aim of transforming riverfront into a lively and attractive destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S20: Aldgate, Tower and Portsoken*

119. The updated policy emphasises the need to deliver a more diverse mix of developments in the area and support the revitalisation of the Mansell Street Estate. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S21: City Cluster*

120. This policy has been extensively amended. City Cluster has been identified as one of the areas appropriate for tall building development. The revised policy emphasises the need to transform Leadenhall Market into a vibrant destination and encourages to enhance its leisure and retail offer. The policy strengthens the requirement for providing free to enter and publicly accessible elevates spaces. Policy further emphasises the need to respect the immediate setting of Bevis Marks Synagogue. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S22: Fleet Street and Ludgate*

121. The policy has been amended to identify Fleet Street as an area appropriate for tall buildings and emphasis the need to strengthen the retail provision along the principle shopping centre. It also highlights the need to diversify the offer by providing cultural and leisure facilities. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S23: Smithfield and Barbican*

122. The policy has been updated to provide greater support to the provision of hotels in appropriate locations along with leisure and retail uses. In addition, it encourages the provision of spaces suitable for other complementary uses such as start-ups, creative industries and meanwhile uses. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S24: Culture Mile Implementation*

123. The policy has been removed, following the wrapping up of the Culture Mile initiative.

*Policy SB1: Culture Mile Impacts*

124. The policy has been removed, following the wrapping up of the Culture Mile initiative. Other policies address the need to mitigate impacts of cultural, night time economy and other uses.

*Strategic Policy S24: Smithfield*

125. This policy has been revised to encourage the growth of the area's retail and leisure economy with a particular focus on establishing Smithfield as a leisure destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

*Strategic Policy S26: Liverpool Street Key Area of Change*

126. This policy has been revised to set out area based priorities for placemaking, aiming to enhance the overall visitor experience by public realm enhancements and improving wayfinding; and connectivity to nearby local destinations. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.



## **Implementing the City Plan**

### *Strategic Policy S27: Planning Contributions*

127. This policy has been updated to include the requirement for securing contributions for cultural provision, highway and public realm enhancements.

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## City Plan 2040 – Local Plan sub-committee October 2023

This version of the City Plan 2040 has been prepared for consideration by the Local Plan sub-committee in October 2023.

It is a 'tracked changes' version, comparing the version produced for the previous Regulation 19 consultation (the first proposed submission draft, dated March 2021) with what is now proposed to be the text of the (second) proposed submission version.

Tracked change formatting is as follows:

**Red underlined bold text**: Substantive additions to wording of the plan

~~Red strikethrough text~~: Substantive deletions of wording in the plan

**Blue underlined bold text**: Additions to wording of the plan that are not substantive

~~Blue strikethrough text~~: Deletions to wording of the plan that are not substantive

Whether or not a change is substantive is a matter of judgement; the changes have been made this way simply to assist Members and others in navigating the most significant changes to the plan.

The document only shows the text of the City Plan. Images and diagrams will be added.

This document may be amended further prior to consideration by the Planning and Transportation Committee in November 2023.

# City Plan ~~2036~~ 2040

## City of London Local Plan

Revised Proposed Submission Draft

~~March 2021~~

March 2024

DRAFT

# Foreword

*(To be completed)*

**Shravan Joshi**

Chair of the Planning & Transportation Committee

DRAFT

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DRAFT

# 1. Strategic Priorities

The City Plan 2040 is the local plan for the City of London. It is a plan for the development of the Square Mile, setting out what type of development the City Corporation expects to take place and where. The City Plan has been prepared to be in general conformity with the London Plan in a way that reflects the specific circumstances of the City. The Local City Plan sets out the City Corporation's strategic priorities for planning the Square Mile, together with policies that guide decisions on planning applications.

- 1.1.1. To help realise our vision for the Square Mile, the City Plan 2040 sets out strategic priorities that underpin the policies in the Plan. These priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners.
- 1.1.2. As set out in the National Planning Policy Framework (NPPF), achieving sustainable development means that the planning system has three overarching objectives – an economic, a social and an environmental objective. The strategic priorities have been grouped accordingly, though many priorities will have benefits for more than one of the three sustainable development objectives.

## 1.2. Economic objective

- Delivering sustainable economic growth, including a minimum of **1.2 million sqm** net additional office floorspace by **2040**
- Ensuring new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces
- Providing flexible and adaptable workspace that meets the needs of different sectors and business sizes, supporting specialist business clusters and promoting a range of complementary uses including education
- Creating a more vibrant and diverse retail economy
- Enhancing the City's evening and weekend economies
- Creating new and enhanced culture, leisure and visitor attractions
- Delivering the accommodation, facilities, attractions and infrastructure required for a leading destination
- Ensuring development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions



- Helping to facilitate the infrastructure requirements of the Square Mile

### 1.3. Social objective

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone
- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy
- Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas
- Engaging with the City's communities including workers and residents and other stakeholders
- Creating a more inclusive, healthier, and safer City for everyone
- Delivering additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City
- Enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile.

### 1.4. Environmental objective

- Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development
- Delivering urban greening and greater biodiversity
- Celebrating, protecting and enhancing the City's unique heritage assets
- Enhancing the City's distinctive and iconic skyline while preserving strategic views of St Paul's Cathedral and the Tower of London World Heritage Site
- Ensuring exemplary design of development
- Promoting greater use of the river Thames for passenger and freight transport, increased enjoyment of the City's riverside and improvements to flood defences
- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel

## 2. Spatial Strategy

2.1.0. Many aspects of the City Plan have a spatial element. Different approaches to development and growth need to be taken in different parts of the City to ensure a sustainable pattern of development is delivered, and to bring forward development in a way that enhances the unique character of the Square Mile. This spatial strategy sets out an overview for how that will be achieved.

1. All parts of the Square Mile will continue to see growth and development over the lifetime of the City Plan 2040. However, some areas – identified in this plan as Key Areas of Change (KAOC) – will see either a greater proportion of net additional floorspace than other parts of the City, or will undergo more significant change to their built form. Priorities for each KAOc are set out in section 14.
2. Net additional office floorspace will primarily be delivered in the City Cluster KAOc, supplemented by floorspace in the Fleet Street and Ludgate KAOc and Liverpool Street KAOc. Office growth will be encouraged in all parts of the Square Mile.
3. Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.
4. Demand for retail growth is likely to be focussed in the four principal shopping centres (PSC) of Moorgate and Liverpool Street; Leadenhall Market; Cheapside; and Fleet Street. Priorities for each area are set out in section 6. Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.
5. Focal areas for culture have been identified in the cultural planning framework, informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.
6. New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.
7. Streets will be planned to facilitate world-class connections and reinforce a Square Mile that is inclusive and accessible to all, as envisaged in the City Corporation’s Transport Strategy.
8. Green corridors will link up the City’s Sites of Importance for Nature Conservation (SINCs), with development complementing and (where appropriate) contributing to wider environmental enhancements along the routes.

9. The Thames riverfront will play an enhanced role for the City, providing more opportunities for leisure, culture and recreation, with improved greening, biodiversity and connectivity.
10. Designated strategic and local views will inform development, with tall buildings focused in the City cluster and the Fleet valley, which are identified as areas suitable for tall buildings.
11. The unique character of different parts of the City, including the area's rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments and five historic parks and gardens) will be celebrated, protected and enhanced, and help to shape new development in the Square Mile.

## 3. Introduction

### 3.1. What is the Local Plan?

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

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

- 3.2.1. The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look.
- 3.2.2. Local Plans are required to look ahead over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. However, they must also be reviewed at least every five years to take account of changing circumstances affecting the area, or any relevant changes in national policy.
- 3.2.3. Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system through its planning reform agenda, with notable changes being made to permitted development rights and the Use Classes Order during 2020. As a result a number of policies the Plan needs updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London is reviewing the London Plan which provides a strategic planning framework for London for the period up to 2041.

3.2.4. ~~By preparing a new Local Plan covering the period to 2036, the City Corporation will be able to address revised national and London Plan policy, whilst maintaining a positive planning framework to meet the City's long-term needs.~~

### ~~3.3.~~ **The stages of preparing the City Plan**

3.3.1. ~~The Proposed Submission Local Plan, titled City Plan 2036 (the 'Plan'), is the third stage of preparing a new local plan. The first stage of the process was the Issues and Options stage in 2016, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered to address them. The second stage, the draft Local Plan, was a consultation on a full draft Plan during later 2018 and early 2019.~~

3.3.2. ~~Since then, the City Corporation has analysed the consultation findings and undertaken further evidence gathering to prepare the final stage, the Proposed Submission Plan.~~

3.3.3. ~~Following consultation on the Proposed Submission Plan, it will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan, which is expected to be adopted in 2022.~~

3.3.4. ~~Figure 1 illustrates the stages in the preparation of City Plan 2036, together with an indicative timescale.~~

### ~~3.4.~~ **Policy context**

3.4.1. ~~This Plan is being prepared in an era of significant and rapid change and has been deliberately drafted to provide a flexible policy framework which encourages appropriate development and is responsive and adaptable to change.~~

3.4.2. ~~In particular, the Plan seeks to provide a flexible, resilient policy framework which responds to three fundamental health and wellbeing, environmental and economic influences: Covid-19, climate change, and the UK's departure from the European Union.~~

#### **Climate change**

3.4.3. ~~The threat from climate change is one of the most serious threats we face today. It extends beyond environmental challenges and has the potential to affect economic prosperity, social justice and global stability. Wide ranging responses are essential, encompassing individual local actions, local, strategic and national government programmes, business and community scale initiatives~~

and global agreements. Scientific evidence indicates that the climate is already changing, and that action is needed to limit global warming to 1.5 degrees.

- 3.4.4. The City Corporation has long been a champion of clean air, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal wellbeing. It has in In 2020 adopted a Climate Action Strategy which sets out a pathway to achieving net zero emissions for both the City Corporation's activities and the wider activities of businesses and residents in the City of London. The Strategy and, more importantly, the actions outlined will ensure the Square Mile and City Corporation achieve net zero carbon by 2040 and make a positive contribution to tackling climate change, are resilient to the risks of climate change and seize the opportunities presented by the transition to a low-carbon economy.

### **Covid-19 pandemic**

- 3.4.5. Much of this Plan was drafted prior to the outbreak of the Covid-19 pandemic, which has had significant health, wellbeing, environmental and economic impacts locally and globally. As medical treatments are discovered and rolled out, including potential vaccines, the severity of these health impacts is expected to reduce and communities will recover in the medium term. However, the pandemic is also leading to behavioural changes; some are temporary, but some are likely to become established as part of the 'new normal'. The acceleration of existing trends and the creation of new trends both need to be taken into account when planning for the medium and longer term. Therefore, the Plan is looking beyond the current pandemic to a period when a probable vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation which harnesses the potential of existing and new trends.
- 3.4.6. Throughout its long history the City of London has been a centre for creative innovation and collaboration, bringing business and people together. the Covid-19 pandemic has in the short term shifted much of the City's business online with many City workers using modern technology to work from home, and consequently significant reductions in journeys into the City and footfall within it. Whilst the use of digital technology and remote working will remain important to the success of many City businesses in the future, reliance solely on remote working can have longer term drawbacks as it can limit the scope of the creative innovation, collaboration and informal business relationships that the City thrives upon. Therefore, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly with a blended approach of in-office and remote working, to meet the changing business environment, space needs and work and lifestyle expectations of their workforce. There is an opportunity to transform City workplaces to offer a rich and fulfilling experience for City workers, with the office becoming a place for socialising, meeting, sharing and collaboration. The return of City workers will bring vitality to provide a boost to businesses that rely on high footfall, including retail, food and beverage and support services to the City's offices, that have been particularly affected by Covid-19.

- 3.4.7. Although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.
- 3.4.8. The City Corporation will work closely with national, regional and local government, landowners and investors, businesses and residents to ensure that the City of London remains successful. It is acknowledged that the pandemic will have short and perhaps medium-term financial implications for the City Corporation and for Transport for London, which may impact on, or delay, implementation of some policy aspirations and will need to be closely monitored. Nonetheless, This Plan will provide a framework to give confidence to those who wish to be involved in and to invest in the City and it has been written to be adaptable to new changes and challenges as they present themselves.

#### **UK trading relationships**

- 3.4.9. As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on the international and national economic context including future trading relationships. The UK's departure from the European Union is leading to new trading relationships and patterns. The City's reputation for expertise and innovation will be particularly important as it adapts its existing strengths in financial and professional services, and develops new strengths, to suit changing global circumstances.
- 3.4.10. The Local Plan is influenced by national and London-wide planning policies and guidance, as well as plans and strategies produced by neighbouring boroughs and a range of statutory bodies.

#### **National planning policy and guidance**

- 3.4.11. Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.
- 3.4.12. The Government's planning reform agenda has resulted in a number of changes to national legislation and guidance. These changes, including those brought forward during 2020 to permitted development rights and the Use Classes Order, have been incorporated into this Plan. The Government has published a Planning White Paper outlining further fundamental changes to the planning system in England which would impact upon the preparation and content of local plans and the operation of development management. These



reforms, if enacted, will be considered through a subsequent review of the City of London's Local Plan.

### **The London Plan and other Mayoral strategies**

- 3.4.13. The Mayor of London has a duty to prepare a spatial development strategy, the London Plan, and to keep it under review. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan for the City of London, along with the City's Local Plan. The Local Plan has been prepared in alignment with the Mayor's Publication London Plan (December 2020).
- 3.4.14. The Mayor produces supplementary planning guidance to provide further detail on particular policies in the London Plan. In addition, the Mayor publishes a range of other strategies, including those relating to transport, the environment, economic development, housing and culture. These documents have been taken into account in the preparation of the City's Local Plan.

### **Neighbourhood Plans**

- 3.4.15. Neighbourhood plans should support the delivery of strategic policies set out in a local plan. Once approved, a neighbourhood plan becomes part of the development plan for the neighbourhood area and is given the same legal status as a local plan. The local planning authority must co-operate with a neighbourhood forum in the preparation of neighbourhood plans, providing assistance as required.
- 3.4.16. At the time of preparation of City Plan 2036, no neighbourhood forum has been established in the City of London and no neighbourhood plans are in preparation or have been adopted. The City Corporation will co-operate with any neighbourhood forum in the preparation and adoption of a neighbourhood plan within the City of London administrative area in accordance with statutory requirements.

### **Duty to co-operate**

- 3.4.17. Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires local planning authorities to engage "constructively, actively and on an ongoing basis" on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.
- 3.4.18. The City Corporation already works closely and co-operates with its neighbouring boroughs, the Mayor of London and other partners on strategic and cross-boundary planning issues. National planning policy requires strategic policy-making authorities to prepare and maintain statements of common ground to demonstrate effective and ongoing joint working. The City Corporation liaising with the Mayor of London, neighbouring boroughs and other duty to co-operate partners to agree statements of common ground to support the development of City Plan 2036 and the development plans and strategies of partners.

## City Corporation strategies

- 3.4.19. The Local Plan can help to facilitate the delivery of other City Corporation strategies where their objectives involve the use or development of land and provides a mechanism to assist with co-ordinating and balancing the requirements of different strategies.
- 3.4.20. In particular, the Local Plan is one of the mechanisms through which the City Corporation's Corporate Plan and Climate Action Strategy will be implemented. The Corporate Plan sets out the City Corporation's overarching strategic direction and is structured around the three pillars of society, economy and environment. Although the Corporate Plan has a shorter time horizon than the Local Plan (2018-23), it is a visionary and forward-looking document and City Plan 2036 complements and helps deliver many of its objectives. The Climate Action Strategy sets out the City Corporation's pathway to achieve a zero carbon City by 2040.
- 3.4.21. This Plan has been prepared alongside the City Corporation's first Transport Strategy. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in City Plan 2036 and the Transport Strategy are aligned.

## Evidence base

- 3.4.22. The policies in City Plan 2036 have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. In some cases, additional studies have been undertaken to provide relevant and up-to-date evidence to support and justify the proposed policies. The evidence that underpins the draft Plan has been published on the City Corporation's website. This includes an assessment, undertaken in March 2020, of the combined effects of the policies in City Plan 2036 on the overall viability of development in the Square Mile and the viability of delivering the Plan's affordable housing targets.

## Integrated Impact Assessment

- 3.4.23. City Plan 2036 has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:
- Sustainability Appraisal, including a Strategic Environmental Assessment;
  - Equality Analysis;
  - Health Impact Assessment.
- 3.4.24. The IIA is an integral part of the plan-making process and has assessed draft policy options in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. IIA is an iterative process and further assessment will be undertaken on changes to the Plan as a result of pre-



~~submission consultation or modifications proposed through the Examination process.~~

~~3.4.25. A Habitats Regulations Assessment has also been undertaken to assess whether the new Plan would have any significant effects on sites designated as being of European importance for their biodiversity.~~

#### ~~Other planning documents~~

~~3.4.26. The Local Plan is supported by a number of other planning and City Corporation documents, including:~~

- ~~• Local Development Scheme — this lists and describes all planning policy documents and the timetable for preparing them;~~
- ~~• Statement of Community Involvement — this sets out the procedures and methods that will be used to consult and engage with the public in the preparation of planning policies, and the determination of planning applications.~~
- ~~• Supplementary Planning Documents (SPDs) — these provide further explanation of Local Plan policies where this is needed.~~
- ~~• The City of London Community Infrastructure Levy (CIL) — CIL is a statutory charge on new development that is used to help fund the provision of infrastructure. A charging schedule specifies the rates that apply according to the land uses proposed.~~
- ~~• The City of London Transport Strategy — this sets out a 25 year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.~~

#### ~~Implementation and delivery~~

~~3.4.27. Implementation of the Local Plan will require partnership working and co-operation with a range of organisations, including developers, businesses, residents, community and amenity groups, transport and service providers, the Mayor of London and other London boroughs.~~

~~3.4.28. A key mechanism for implementing the Local Plan is the consideration of planning applications through the development management process. Policies in this Plan apply to all development, including major new development, extensions to existing buildings, other major refurbishments and minor development, unless otherwise specified in individual policies. The Local Plan should be read as a whole and applications for planning permission will be considered against all relevant policies in the Local Plan, the London Plan, the NPPF and any future neighbourhood plans.~~

~~3.4.29. The City Corporation will work closely with developers, occupiers and residents to ensure that City Plan 2036 is implemented and delivers positive~~

improvements across the City. Where necessary, the City Corporation will use its powers of enforcement to ensure compliance with, and effective implementation of, Local Plan objectives and policies. The City Corporation's Enforcement Plan has been adopted as a Supplementary Planning Document and sets out the principles and procedures that will be followed to ensure development is effectively regulated. Where necessary, enforcement action will be taken. The Enforcement Plan will be kept under review and amended to reflect new provisions arising out of changes to national, London-wide or local policy and/or practice and experience in implementation.

- 3.4.30. The City Corporation will also use its powers in relation to issues such as management of the highways and public realm to help deliver the vision and policies in City Plan 2036. It will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high-quality development the City needs. An Infrastructure Delivery Plan has been prepared identifying the infrastructure required to deliver the Plan and demonstrating the deliverability of infrastructure during the plan period. It considers the investment plans of a range of infrastructure providers to identify potential gaps in funding, or trigger points which require a step change in levels of infrastructure. If gaps in the funding of infrastructure necessary to implement the Local Plan are identified, the City Corporation will seek alternative funding streams, including the use of CIL and other contributions from development, and will prioritise available funds.

### ~~3.5. Structure of City Plan 2036~~

- 3.5.1. The structure of City Plan 2036 is based on the three strategic aims of the City Corporation's Corporate Plan, which are to:
- ~~Contribute to a flourishing society;~~
  - ~~Support a thriving economy; and~~
  - ~~Shape outstanding environments.~~
- 3.5.2. Individual policy topics are grouped within these broad themes. The first policy under each topic is a Strategic Policy, which addresses the strategic context, the relationship with other plans and strategies, and key planning issues. These policies are followed by Development Management Policies that will be used alongside the Strategic Policies in the consideration of applications for planning permission and related consents.
- 3.5.3. A fourth theme of Key Areas of Change has been added to provide a framework for the area-specific policies within the Local Plan, and a fifth theme of Implementation has been added to focus on how the Plan will be delivered.
- 3.5.4. The structure of the Plan is shown diagrammatically in Figure 3 and is not intended to represent any form of hierarchy.

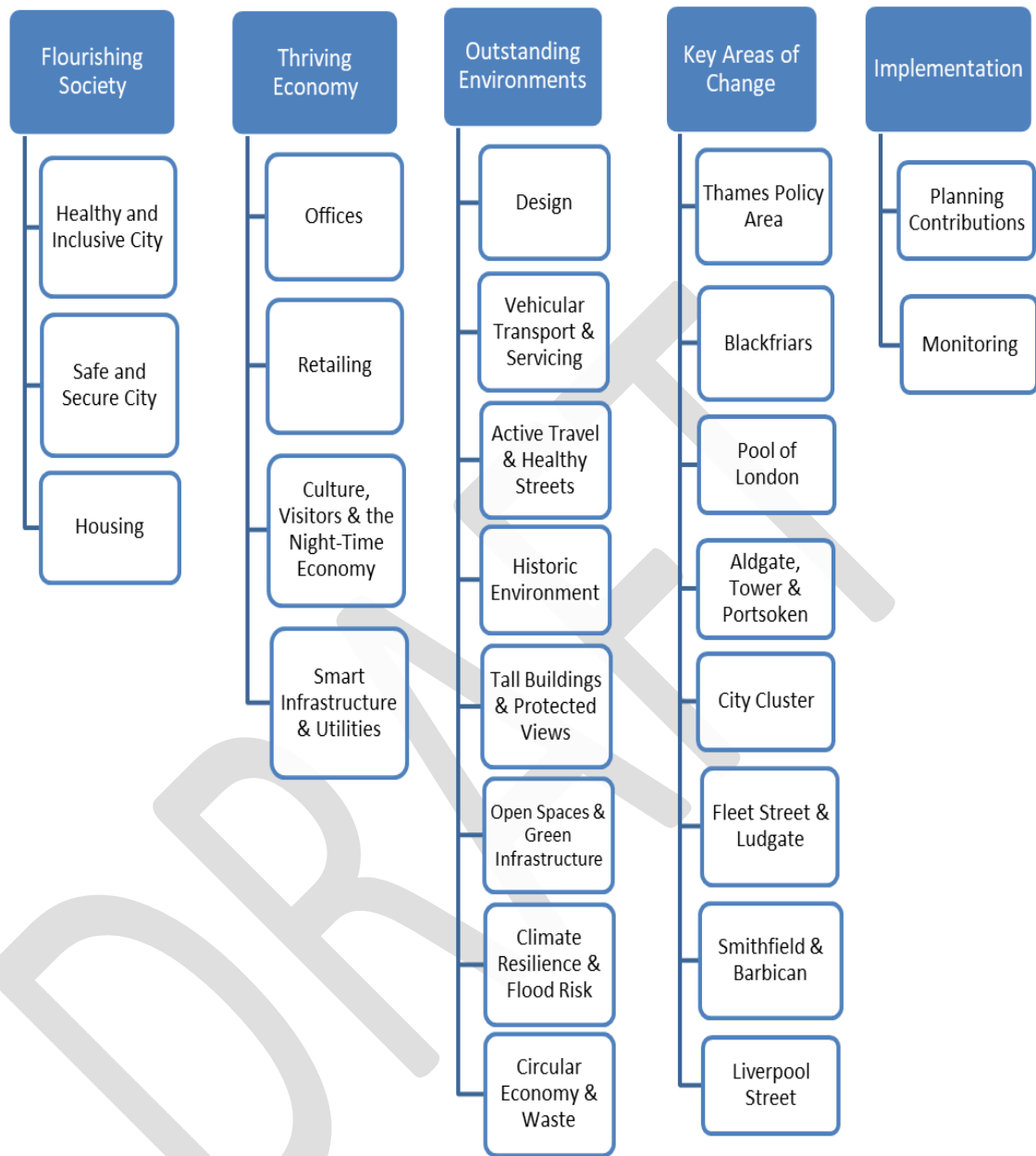


Figure 3: Structure of City Plan 2036

## 4. ~~The City Today~~

# 5. Vision, Strategic Objectives and Spatial Strategy

### 5.1. Contribute to a Flourishing Society

#### ~~The Vision....~~

- ~~5.1.1. The needs of the City's diverse communities will be met in a sustainable and inclusive way, addressing the health, employment, education, leisure and housing needs of the variety of people who work, live and visit the City and incorporating the principles of Good Growth set out in the London Plan.~~
- ~~5.1.2. The City's population will enjoy good health and wellbeing. The health and wellbeing of the City's communities will be integral to the design and delivery of new buildings, open spaces and the wider public realm, helping the City recover from the Covid-19 pandemic, provide inclusive and diverse spaces and address the implications of climate change. Health inequality across the City will be reduced. Workers and residents will have access to a range of health services within the Square Mile and beyond. Partnership working with businesses and organisations both inside and outside the City will effectively tackle the wider causes of poor health by substantially improving the City's air quality, promoting the recreational benefits of a healthy lifestyle, and ensuring inclusive access to good quality open spaces and recreational opportunities.~~
- ~~5.1.3. The City will have a network of high quality social and community facilities in accessible locations to foster cohesive and healthy communities. Links with neighbouring boroughs will be strengthened and closer co-operation will provide a stronger sense of community and more efficient services.~~
- ~~5.1.4. There will be a mix of housing, located in or near identified residential clusters, providing a high-quality living environment consistent with a city centre location. Housing will not be appropriate where it would conflict with the City's global business role or result in poor residential amenity. Affordable housing will be required on-site within the City. Where off-site contributions are exceptionally allowed, they will be used to deliver new affordable housing within and outside of the City, principally on the City's managed housing estates, contributing to meeting London's wider housing needs.~~
- ~~5.1.5. The City will remain a safe place to work, live and visit. Security measures will be designed into new buildings and public spaces, whilst ensuring that the City's streets, walkways and open spaces are welcoming and inclusive. Where necessary, an area-wide approach to delivering collective security will be sought working with the City of London Police as a key partner.~~

- 5.1.6. ~~Good building design and effective management of night-time entertainment, combined with a broad mix of uses, will reduce the potential for anti-social behaviour and adverse impacts on residents and will help to maintain residential amenity.~~
- 5.1.7. ~~The City Corporation will work with partners to ensure that high quality training and learning facilities are accessible to all and that the City's higher education institutions continue to enjoy an international reputation for excellence. City residents and those in neighbouring boroughs will develop the skills needed to enter careers in the City and benefit from the City's prosperity. The City will offer equality of opportunity, accessibility and involvement so that people from across London's diverse communities will have the chance to benefit from the many opportunities and facilities it offers.~~

**Strategic Objective:**

- 5.1.8. ~~To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.~~

## **5.2. Support a Thriving Economy**

**The Vision....**

- 5.2.1. ~~The City will remain the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas and flexible ways of working, particularly in the technology and creative sectors, and delivering inclusive and sustainable growth and prosperity for its communities, London and the UK.~~
- 5.2.2. ~~The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.~~

~~The City will be open to new business, new ideas and innovations and new ways of working and collaborating, building upon the experience and lessons learned through the Covid-19 pandemic. New business floorspace will be flexible and adaptable, creating spaces for collaboration and innovation and meeting the demands of different types of business occupiers and their workforces, including incubators, start-ups and other small and medium sized companies. There is an opportunity for The City's cultural offer to be central to its recovery and future resilience. Office space will be complemented by other accessible commercial, cultural and leisure uses adding vibrancy and animation to the City's streets and benefitting the City's diverse communities.~~

- 5.2.3. ~~The number of business and tourist visits to the City will significantly increase as the City is recognised for its world-class cultural, and creative, sports and leisure facilities. Culture Mile will transform the north west of the City into a~~

vibrant and inclusive strategic cultural area of national and international stature. The City's retail offer will adapt to changing demands, offering a range of meanwhile and complementary services to the City's wider business and cultural offer and contributing to the City's development as an evening and 7-day a week retail, leisure and cultural destination. Retail growth will be focused on the Principal Shopping Centres of Cheapside, Liverpool Street/Moorgate, Leadenhall Market and Fleet Street. Smaller retail, collaboration and cultural uses will be provided across the City, animating ground floor spaces and meeting local worker and resident needs.

- 5.2.4. The City's continued economic success will be underpinned by world-leading digital connectivity and data services both within buildings and in the public realm. The provision of utilities and infrastructure will anticipate the demands set by the City's growth, funded in part through the Community Infrastructure Levy and planning obligations.

#### **Strategic Objective:**

- 5.2.5. To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

### **5.3. Shape Outstanding Environments**

#### **The Vision....**

- 5.3.1. The City will be physically well connected and responsive. Sustainable travel patterns and modes of transport will be promoted and public transport capacity increased, principally through the opening of the Elizabeth Line, and the Northern Line/Bank Station Upgrade.
- 5.3.2. The City's streets will provide an attractive and safe environment for walking and cycling. Pavement widening and reallocation of road space for pedestrian or cycle use, allied with increased planting and greenery, will provide more space for moving around, building on the initiatives put in place during the Covid-19 pandemic. Traffic reduction and improvements to the City's streets and junctions will transform the safety, look and feel of the City's street network.
- 5.3.3. Partnership working with City businesses and developers will minimise the number of delivery and servicing trips into the City and will reduce congestion through consolidation and by re-timing trips to take place outside of peak hours. The majority of last mile deliveries will be undertaken by zero emission vehicles, and the City's air quality will significantly improve as a greater share of motorised traffic switches to electric or other zero emission modes.
- 5.3.4. Use of the River Thames by commuters and for freight and servicing will significantly increase as the Thames becomes a major corridor for the movement of people and the transport of materials including construction and deconstruction materials, waste, freight and general goods.

- 5.3.5. ~~The City will remain a centre of world class architecture with flexible, adaptable and healthy buildings and a high quality of public realm for people to admire and enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline and provide for the health and wellbeing of workers, adding to the tall building cluster in the east of the City.~~
- 5.3.6. ~~The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where this is appropriate, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, backdrop and views of St Paul's Cathedral and the Tower of London.~~
- 5.3.7. ~~Buildings, streets and spaces will be inclusive, interesting, legible and fit for purpose. Computer modelling, simulation and smart technology will be used to ensure that new buildings, and the spaces between buildings, create an environment which attracts businesses and people from across the world.~~
- 5.3.8. ~~The City's buildings, public realm and transport will be highly sustainable, designed to make efficient use of natural resources, minimise emissions and be resilient to natural and man-made threats. In partnership with public and private sector organisations the City will adopt new technologies to transition to a zero emission City by 2040, in line with the ambitions set out in the City Corporation's Climate Action Strategy.~~



# 6. Health, Inclusion and Safety Contribute to a Flourishing Society

## 6.1. Healthy and Inclusive City

### Context

6.1.1. The City of London is a very densely built up area with a large daytime population and limited open space. The City's economic success means there is a high level of construction activity, while the density of development and employment, delivery and servicing requirements and the narrowness of many of the City's streets all contribute to traffic congestion. This can result in poor air quality, noise and light pollution and a shortage of adequate open spaces, play and recreational spaces, impacting on the health of residents, workers and visitors.

6.1.2. The NPPF and the London Plan stress the importance of health and wellbeing and the role that the planning system can play in improving this. Planning can support strategies to improve health and cultural wellbeing and promote healthy communities. Planning decisions can have an influence on people's health, particularly through the design and management of new development.

The City Corporation is committed to enabling a socially and economically inclusive environment in which nobody is disadvantaged. Everyone should have equal opportunities to access buildings, spaces, job and training opportunities and health, leisure and educational services. An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions or impaired mobility and people. An inclusive City allows all communities, irrespective of their social and economic position, to equally access the opportunities the City offers. This includes communities in neighbouring boroughs that should feel welcome to share in and contribute towards the City's success.

6.1.3. An important element of this commitment is breaking down unnecessary physical barriers and exclusions arising from the poor design of buildings and spaces. The needs of disabled people should be considered at an early stage of the planning process and not considered separately from the needs of others.

6.1.4. A wide range of elements contribute to a healthy and inclusive environment. The transport and design policies in this Plan address relevant issues such as: Healthy Streets, active travel and permeability; inclusive transport; mitigating the impacts of pollution through the design of streets and public spaces; and providing adequate shade and shelter. Green infrastructure policies highlight the benefits to health and wellbeing of open spaces and greenery within the urban environment.



## **Strategic Policy S1: Healthy and Inclusive City**

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The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, **employment**, education, recreation, sport and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings, **streets** and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments of different levels depending on the scale and impact of the proposed development;
4. Requiring the design and management of buildings, streets and spaces to provide for the access **needs requirements** of all the City's communities, including ~~the particular~~ **needs of** disabled people, older people and people with young children;
5. **Requiring inclusive design and management of buildings, streets and public spaces to provide for the requirements of all the City's communities;**
6. Expecting developers and development to:
  - engage with neighbours before and during construction to minimise adverse impacts;
  - promote healthy buildings and the use of relevant standards that measure health and wellbeing in buildings;
  - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
  - respect the City's quieter places and spaces;
  - limit unnecessary light spillage and 'sky glow';
  - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment;
7. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing **City** schools **and higher education providers within the Square Mile**, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;
8. Encouraging the further provision of both public and private health facilities. Conditions may be attached to permissions for public healthcare facilities to ensure their future retention;

9. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
  10. Supporting facilities for the provision and improvement of social and educational services through the City's libraries;
  11. Supporting nursery provision and additional childcare facilities;
  12. Protecting and enhancing existing community facilities, allowing for relocation where justified, and providing new facilities where required; and
  13. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities, within major developments and public realm improvements, in line with the aims of the City Corporation's Sports Strategy.
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#### Reason for the policy

6.1.5. The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:

- Good mental health for all;
- A healthy urban environment;
- Effective health and social care integration;
- All children have the best start in life; and
- Promoting healthy behaviours.

~~6.1.6.~~ The Local Plan has a particular role in delivering a healthy urban environment, as it can address issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. *The Joint Health and Wellbeing Strategy notes there is strong evidence that the environment shapes wider health outcomes and it seeks to "ensure health and wellbeing issues are embedded into the Local Plan and major planning applications."*

6.1.7. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.

6.1.8. The small permanent residential population in the City means that it is often not economic to deliver effective services for City residents from locations within the City. The City Corporation therefore works jointly with neighbouring boroughs and

service providers to ensure that cost effective services can be provided. ~~For example, the City Corporation is working jointly with Islington to deliver the City of London Primary Academy Islington on a site which crosses the City/Islington boundary.~~ The City Corporation will work with the City and Hackney [Clinical Commissioning Group Integrated Care Board](#) and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.

- 6.1.9. The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.
- 6.1.10. Advances in technology and an awareness of how office environments can impact people's mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.
- 6.1.11. Outdoor spaces and the public realm ~~are under increasing pressure to~~ provide places for relaxation, amenity and ~~flexible working~~ [leisure](#). The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels, [and assisting in the restoration and recovery from sensory overload](#).
- 6.1.12. The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

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## How the policy works

- 6.1.13. ~~To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and wellbeing, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling. This could include the provision of land or spaces for food growing, which can help promote a more active lifestyle, improve social cohesion and mental and physical health and wellbeing.~~
- 6.1.14. ~~To facilitate the delivery of a healthy city, developers should engage with neighbours before and during construction to ensure impacts on the amenity of neighbours can be minimised.~~
- 6.1.15. ~~Developers are encouraged to use established assessment methodologies to ensure that development contributes towards a healthy city. There are several accreditation systems that attempt to measure the health and wellbeing elements of building design, construction and operation and how these features impact on health and wellbeing.~~
- 6.1.16. ~~Major commercial developments should seek to reach outwards into the community by providing services and facilities which can benefit wider health and contribute to ambitions to reduce single use plastics and other waste through the use of public drinking fountains, as well as providing defibrillators and publicly accessible toilets, for example through membership of the Community Toilet Scheme. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.~~
- 6.1.17. ~~Major commercial developments are also encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and wellbeing of the City's communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations.~~
- 6.1.18. ~~Changes to the Use Classes Order introduced in September 2020 have included certain health and medical services such as clinics, health centres, creches, day nurseries and day centres within the new Use Class E. This means that such uses could be converted to a range of other Class E commercial, business and service uses without planning permission. Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.~~

## Policy HL1: Inclusive buildings and spaces

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Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

1. Inclusive, **welcoming** and safe for all, regardless of ~~disability~~, age, ~~gender~~, **disability**, ~~ethnicity, faith or economic circumstance~~ **gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation. Major applications should develop and submit equality impact assessments, demonstrating how this will be achieved**;
  2. convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
  3. responsive to the ~~needs~~ **requirements** of all users who visit, work or live in the City, ~~including ethnicity, faith or economic circumstance~~, whilst recognising that one solution might not work for all;
  4. **a place that promotes equity, diversity and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access.**
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### Reason for the policy

- 6.1.19. **An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions or impaired mobility and non-disabled people.** The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users ~~and particularly for disabled and elderly people and those with other mobility difficulties~~. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit and which feels open and welcoming to people from different backgrounds.
- 6.1.20. **Under the public sector equality duty, local authorities are required to have regard to the objectives of eliminate discrimination, harassment and victimisation; to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and foster good relations between persons who share a relevant protected characteristic and those who do not.**

### How the policy works

- 6.1.21. Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design **and the promotion of equity, diversity and social inclusion.** Applicants should ~~and~~ **engagement** with relevant user groups, including health and social care providers, **at early stages to inform their approach.** Such engagement should take place **before** ~~at~~ the



detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design and Access Statements must include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.

- 6.1.22. **Applicants should submit Equality Impact Assessments for major developments to ensure the needs of people belonging to groups with protected characteristics are met, and demonstrating how the development would promote equality, diversity and inclusion.**

## **Policy HL2: Air quality**

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1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must **comply with the requirements of the provide an Air Quality SPD for Air Quality Impact Assessments (AQIAs);**
2. Development that would result in a worsening of the City's nitrogen dioxide or PM<sub>10</sub> and PM<sub>2.5</sub> pollution levels will be strongly resisted;
3. All developments must be at least Air Quality Neutral. Developments subject to an **EIA Environmental Impact Assessment** should adopt an air quality positive approach **wherever possible**. Major developments must maximise credits for the pollution section of the **Building Research Establishment Environmental Assessment Method (BREEAM)** assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>);
4. Developers will be expected to install non-combustion energy technology where available;
5. A detailed Air Quality Impact Assessment will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation;
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments. **All developments should comply with the requirements of the London Low Emission Zone for Non Road Mobile Machinery;**
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion

of pollutants and be at least 3 metres away from any publicly accessible roof spaces.

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### Reason for the policy

- 6.1.23. Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area, due to national health-based objectives for the pollutants nitrogen dioxide (NO<sub>2</sub>) and small particles (PM<sub>10</sub>) not being met. National targets for PM<sub>2.5</sub> are also not met.
- 6.1.24. The City Corporation is working with a wide range of organisations to address this problem and levels of NO<sub>2</sub> are falling, although the health-based limits are still not met everywhere in the Square Mile. The City Corporation's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO<sub>2</sub> by the beginning of 2025. Limits set ~~in European Directives~~ for particulate matter (PM<sub>10</sub> ~~and PM<sub>2.5</sub>~~) are generally met although the national target for PM<sub>2.5</sub> is not met anywhere in the City, except adjacent to the busiest roadsides in unfavourable weather conditions. However, the WHO has identified health impacts even at very low concentrations. The Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM<sub>10</sub> and PM<sub>2.5</sub> by 2030.
- 6.1.25. The City Corporation's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile. ~~, including the introduction of local Zero Emission Zones covering Barbican and Golden Lane and the City Cluster by 2022. An interim two-way Zero Emission Street at Beech Street will be implemented in 2020.~~ While the main source of pollutants in the City has historically been road transport, ~~following implementation of the Mayor's Ultra Low Emission Zone in 2019 it is forecast that a greater share of remaining air pollutants will be generated by buildings. It is predicted that by 2020~~ buildings now will account for over half of NO<sub>x2</sub> emissions arising in the City. Tackling poor air quality requires a broad range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting on and around buildings and within the public realm can help to trap particulate pollution.

### How the policy works

- 6.1.26. The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and actions being pursued by the City Corporation and a range of partners to improve air quality. The Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile. The City Corporation's Code of Practice for Deconstruction and Construction Sites and the Mayor's Control of Dust and Emissions during Construction and Demolition SPG provide guidance on



procedures to be adopted to minimise the impacts of demolition and construction activities on air quality.

- 6.1.27. Developers will be required to manage the impact of their proposals on air quality, which should as a minimum be air quality neutral. Large-scale developments that are subject to [Environmental Impact Assessment EIA](#) procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City's air quality. ~~The Mayor of London intends to produce guidance to inform the preparation of statements for developments taking an air quality positive approach.~~
- 6.1.28. Developers are expected to fully explore the use of non-combustion generators, though it is recognised that there are currently limited options for non-combustion generators. In the short term, alternatives to using diesel as a fuel for generators may be acceptable where non-combustion options are not available. Technological advances during the life of the Plan will create more opportunities to install non-combustion generators.

### **Policy HL3: Noise and Light pollution**

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- ~~1. Developers must consider the noise and lighting impacts of their development.~~
- ~~1. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.~~
- ~~3. Any potential noise or light pollution conflicts between existing activities and new development should be minimised. New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.~~
1. A noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces. **New noise-generating development should include suitable mitigation measures such as noise attenuation or restrictions on operating hours.**
- ~~2. Any potential noise pollution conflict between existing activities and new development should be minimised, in line with the 'agent of change' principle. New development must include suitable mitigation measures such as attenuation of noise or restrictions on operating hours.~~
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

4. Opportunities will be sought to incorporate improvements to the acoustic ~~and existing lighting schemes~~ environment within major development.
  5. **When bringing forward major development proposals, developers should explore opportunities to enhance the existing acoustic environment.**
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#### Reason for the policy

~~6.1.29.~~ The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise ~~and light pollution~~ impacts applies to both development that introduces new sources of noise ~~and light pollution~~ and development that is sensitive to noise ~~and light pollution~~.

6.1.30. ~~Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular problem where large commercial buildings have lights on during the night, which can impact residential amenity.~~

6.1.31. The main noise and vibration sources related to new developments in the City are:

- Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
- Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- Leisure facilities and licensed premises, involving noise from people and amplified music; and
- Servicing activities such as deliveries, window cleaning and building maintenance.

6.1.32. Noise ~~and light~~ sensitive uses and developments in the City include residential developments, (~~including~~ hotels and serviced apartments), health facilities, schools and childcare provision and certain open spaces.

~~6.1.33.~~ Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making. ~~Policy CV4: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.~~

#### How the policy works

6.1.34. The City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration impacts of development. The use of planning

conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

- 6.1.33. Some major developments may have the potential to enhance the City's acoustic environment. ~~When bringing forward major development proposals, developers are encouraged to consider whether there may be opportunities to enhance the existing acoustic environment,~~ for instance by incorporating water features that can aid relaxation, help to mitigate sensory overload and help to mask traffic noise. More information about this can be found in the City Corporation's Noise Strategy.
- 6.1.34. For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.
- 6.1.35. ~~The City Corporation has adopted a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes. Lighting proposals should take account of impacts on biodiversity and should be designed to ensure an appropriate habitat to improve biodiversity in the City. Particular attention should be paid to the impact of lighting on the City's bat population.~~

#### **Policy HL4: Contaminated land and water quality**

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Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

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##### Reason for the policy

- 6.1.36. When a site is developed, and ground conditions change there is potential for contaminants to be mobilised, increasing the risk of harm. Site investigation should establish whether the proposed use is compatible with the land condition. The term "non-human receptors" encompasses buildings and other property, or ecological systems and habitats, which may be harmed as a result of contaminated land or water.

##### How the policy works

6.1.37. Pre-application discussions will be used to identify the particular issues related to environmental protection that are relevant to each development site. The City Corporation has published a Contaminated Land Strategy and a Contaminated Land Inspection Strategy, which provide details of the issues likely to be encountered in different parts of the City and should be used for reference by developers.

### **Policy HL5: Location and protection of social and community facilities**

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1. Existing social and community facilities will be protected in situ unless:
    - replacement facilities **of at least equivalent quality, quantity and accessibility** are provided on-site or within the vicinity which meet **existing and predicted future** the needs **for this type** of ~~the users of the existing~~ facility; or
    - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, **and with equivalent or improved accessibility for relevant user groups**; or
    - it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site.
  2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:
    - ~~Where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use~~
    - in locations which are convenient to the communities they serve;
    - in or near identified residential areas, providing their amenity is safeguarded; and
    - as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
  3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.
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#### **Reason for the policy**

6.1.38. Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services **that are accessible to those communities**. As such they make a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education. Library and educational facilities and those that support the City's business and cultural roles are particularly important. A definition of social and community facilities, with reference to the Use Classes Order, is provided in the glossary.

## How the policy works

- 6.1.39. Existing social and community facilities will be protected in situ, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises, or that necessary services can be delivered from alternative premises without a reduction in service provision. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to another social and community use in the first instance.
- 6.1.40. Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources ~~=For example, the Artizan Street Library hosts community meeting rooms, play groups and exercise classes as well as traditional library facilities.~~ Places of worship have the potential to accommodate a range of activities on their premises which can help improve community cohesion. Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.
- 6.1.41. Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable size or provide a better quality of service to target communities.
- 6.1.42. **Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.**

## **Policy HL6: Public toilets**

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The City Corporation will promote a widespread distribution of publicly accessible toilets which meet public demand by:

1. requiring the provision of a range of directly accessible public toilet facilities **suitable for a range of users including disabled people, families with young children and people of all gender identities** in major retail, leisure and transport developments, particularly near visitor attractions, public open spaces and existing major transport interchanges. Provision should be made **for free 'Changing Places'** for disabled people and their carers ~~(changing places toilets)~~ **and facilities for feeding infants**;
2. requiring publicly accessible toilets **with visible signage**, which should be available ~~during normal opening hours, or~~ **24 hours a day, particularly** in **suitable** areas with concentrations of night-time activity;



3. supporting an increase in the membership of the Community Toilet Scheme **(CTS)**;
  4. resisting the loss of existing publicly accessible toilets as a result of redevelopment, and requiring the provision of replacement facilities, unless adequate provision is available nearby; and
  5. requiring the renewal of existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments, **such as hotels and office schemes, where they are needed to meet increased demand, especially in locations likely to see significant footfall and visitors.**
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#### Reason for the policy

- 6.1.43. Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly accessible toilets are a particularly important facility for ~~a number of~~ **certain** groups, such as ~~the elderly, those with disabilities~~ **disabled people, older** people, **families** with babies and young children **and** pregnant women ~~and others with chronic illnesses~~. They are also important to meet the needs of tourists and visitors to the City. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.
- 6.1.44. Areas of the City with concentrations of night-time entertainment require adequate publicly accessible toilet provision to prevent fouling on the streets.

#### How the policy works

- 6.1.45. The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the ~~Community Toilet Scheme~~ **City's CTS, and will seek their provision where appropriate in other major developments such as office and hotel schemes.** The ~~Community Toilet Scheme~~ **scheme** allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.
- 6.1.46. Publicly accessible toilets should be clearly signposted to ensure they are easily found **and should be available 24 hours a day other than in exceptional circumstances.** The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.
- 6.1.47. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, rather than as a replacement. **Changing places toilets are particularly encouraged in proximity to cultural attractions and should be available for use on a 24 hour basis. Management and maintenance is important to safe use and should be secured through the**

planning process. Where publicly accessible toilets are provided, consideration should be given to the provision of self-contained gender-neutral toilets.

## **Policy HL7: Sport and recreation**

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1. **The City Corporation will promote the expansion of the City's sport and recreation offer, by encouraging sport and recreation provision as part of appropriate new developments and helping to deliver a network of free outdoor sporting facilities in the City.**
  2. Existing public sport and recreational facilities will be protected in situ, unless:
    - replacement facilities **of at least equivalent quality, quantity and accessibility** are provided on-site or within the vicinity that meets **existing and predicted future** the needs ~~of the users of that~~ **for this type of** facility; or
    - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
    - it has been demonstrated through active marketing, at reasonable terms for sport and recreational use, that there is no demand for the existing facility or alternative sport and recreation facilities which could be met on the site.
  2. The provision of new sport and recreation facilities, particularly publicly accessible facilities, will be encouraged **in locations which are convenient to the communities they serve. New facilities should provide flexible space to accommodate a range of different uses and users, must be accessible to all, and should not cause undue disturbance to neighbouring occupiers.**
    - ~~where they provide flexible space to accommodate a range of different uses/users and are accessible to all;~~
    - ~~in locations which are convenient to the communities they serve, including open spaces;~~
    - ~~near existing residential areas;~~
    - ~~as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses; and~~
    - ~~where they will not cause undue disturbance to neighbouring occupiers.~~
  3. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.
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### Reason for the policy

6.1.48. There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym

facilities, including those within office developments and some hotels. While this is welcome, many facilities charge substantial fees and are not available to those seeking more informal, occasional and cheaper sport and leisure opportunities. By supporting new facilities, and creating a network of facilities across the Square Mile, the City can encourage healthier and more active lifestyles for all. Demand for such facilities is likely to increase due to the rapid growth in the working population and as the City becomes more of a destination for visitors as well as the increasing recognition of the importance of healthy lifestyles, means there is a continued demand for these facilities.

#### How the policy works

6.1.49. The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. Where new outdoor facilities are created, priority will be given to those that provide opportunities for recreation that are free or available at low cost. Consideration should be given to locating outdoor exercise facilities for adults and children's play equipment near each other, where appropriate.

~~The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan. Following changes to the Use Classes Order introduced in September 2020, existing gyms and other indoor recreational uses could be converted to a range of alternative Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.~~

~~Open spaces and publicly accessible rooftops can provide valuable formal or informal sports and recreational facilities in the densely built City environment. An imaginative approach to multi-purpose structures in outdoor spaces can allow seating and other street furniture to be designed to also facilitate physical activities that promote health and fitness, such as stretching, sit ups and markers for walking and running distances. Outdoor exercise is beneficial but those exercising need to be mindful of the safety of others and the busy city centre context.~~

#### **Policy HL8: Play areas and facilities**

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1. The City Corporation will promote opportunities for inclusive play and the provision of high quality play equipment and spaces in the City, by:
2. ~~protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas where a need has been identified, by:~~



- protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- **seeking additional or enhanced play equipment and spaces, particularly in areas near to existing or planned attractions, and in places within and well connected to residential areas and other places likely to be used by children and young people;**
- requiring external play space and facilities as part of major new residential developments;
- Where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or provide financial contributions to enable the provision of facilities elsewhere;
- promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas; **and**
- **ensuring play facilities are designed inclusively, considering in particular differences in age, gender, neurodiversity and disability. Developers should seek to engage children and young people in the design of play spaces.**

2. Play areas and facilities must **be inclusive and** not be located in areas of poor air quality due to the negative health impacts on young children.

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#### Reason for the policy

6.1.50. Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play. **As the City increasingly becomes a destination for a wider range of visitors, including families, children and young people, there will be increased demand for play spaces that are free of charge, well-designed, inclusive and accessible. These are likely to be focussed in areas near to leisure destinations such as the new Museum of London in Smithfield and along the Thames riverfront. Play near and within residential areas is also an important component of ensuring communities can be active and healthy and have fun near where they live.**

#### How the policy works

6.1.51. The high rate of development in the City and the creation of new, and improvement of existing, public realm creates opportunities for informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

6.1.52. Public realm improvements and the creation of new open spaces should be designed imaginatively to serve the needs of **all the City's communities** workers but also offer informal play opportunities. **Children and young people are diverse in their experiences of the world and have different ways that they want to**

play and hang out in social spaces. The design of play space should be informed by these differences and children and young people should be involved in helping to design them. Where the opportunity arises, the City Corporation will enable appropriate sensory play areas in the City for disabled children, young people and adults and those with special educational needs and disabilities.

### **Policy HL9: Health Impact Assessment (HIA)**

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The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts.

Major development should submit a rapid Health Impact Assessment (HIA). A full HIA will be required on those developments that are subject to an Environmental Impact Assessment (EIA). An HIA may also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

- ~~1. requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist; and~~
  - ~~2. requiring a Rapid or Full HIA to be submitted for larger scale development proposals.~~
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#### Reason for the policy

- 6.1.53. The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of workers can impact on people's physical and mental health.
- 6.1.54. Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.

6.1.55. HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. The Covid-19 pandemic has highlighted the important role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.

6.1.56. HIAs can highlight mitigation measures that may be appropriate to enable developments to maximise the health of communities.

#### How the policy works

6.1.57. Developers will be expected to identify potential impacts on health resulting from all major developments in the City, **following the approach set out in the City Corporation's Health Impact Assessment guidance note.** ~~To assist this process, the City Corporation will publish guidance based on the NHS London Healthy Urban Development Unit's (HUDUs) HIA methodology but adapted to address City specific issues.~~

6.1.58. ~~In line with the Mayor of London's Social Infrastructure SPG, the level of HIA required will depend upon the scale and impact of the development.~~

#### **Desktop assessment**

6.1.59. ~~This draws on existing knowledge and evidence, often using published checklists which provide a broad overview of potential health impacts. The City Corporation will prepare a Healthy City Planning checklist for this purpose, which will incorporate relevant elements of TfL's Healthy Streets Check to ensure that land-use and transport impacts on health are considered in a coordinated way.~~

6.1.60. ~~The Healthy City Planning checklist should be submitted with planning applications for developments of between 10 and 99 dwellings or between 1,000m<sup>2</sup> – 9,999m<sup>2</sup> of commercial floorspace. It will also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.~~

#### **Rapid HIA**

6.1.61. This **involves** ~~would require a more~~ focused investigation of health impacts **and** ~~which~~ would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London HUDU Rapid HIA Tool to reflect the City's circumstances and will expect this to be used for **major** developments ~~of 10,000m<sup>2</sup> or greater commercial floorspace or 100 or more residential units.~~

#### **Full HIA**

6.1.62. This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from

health needs assessments, reviews of the evidence base and community engagement. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.

- 6.1.63. HIAs must look at the issue of health comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

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## 6.2. Safe and Secure City

### Context

The City is a safe place to live, work and visit, with low rates of crime. The continuing security and safety of the City is key to its success, whether as a base for a company, a place to live or somewhere to spend leisure time. As a world leading financial and professional services centre, addressing potential risks from fraud, terrorism and cyber crime is of critical importance.

The City of London has its own police force, which enables it to focus on the City's specific circumstances while playing a leading national role in combatting economic and cyber crime. The City of London Police publishes a three-year Policing Plan, updated annually, which sets out priorities that address both its national and local obligations. Current priorities are:

- Counter terrorism;
- Cyber crime;
- Fraud;
- Vulnerable people;
- Roads policing;
- Public order;
- Violent and acquisitive crime;
- Antisocial behaviour.

The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership's vision is for the City of London to be a safe place to live, learn, work, and visit. The Partnership meets regularly and publishes a Strategic Plan, which identifies the following outcomes for 2019-2022:

- Vulnerable people and communities are protected and safeguarded;
- People are safe from violent crime and violence against the person;
- People and businesses are protected from theft and fraud/acquisitive crime;
- Anti-Social Behaviour is tackled and responded to effectively;
- People are safe and feel safe in the Night-Time Economy.

The Secure City programme is a joint initiative between the City Corporation and City of London Police, intended to deliver significant improvements to the safety of residents, workers and visitors. Drawing on the success of historic approaches to security and the latest examples of best practice from cities across the world, the programme will future-proof security arrangements to meet emerging challenges such as protecting new crowded spaces. The programme will integrate with other

initiatives including Smart City technology and Culture Mile and will align with this Plan and the City Corporation's Transport Strategy.

4.2.5 The City is home to the Central Criminal Court at the Old Bailey, the Rolls Building Court complex, the Mayor's and the City of London Court, the City of London Magistrate's Court and the Inner and Middle Temples Inns of Court, together with a number of legal firms.

## **Strategic Policy S2: Safe and Secure City**

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The City Corporation will work with the City of London Police, [the National Protective Security Authority \(NPSA\)](#) and the London Fire Brigade to ensure that the City is **safe and** secure from crime, **the fear of crime, anti-social behaviour** disorder and terrorism, ~~and is able to accommodate large numbers of people safely and efficiently~~ by:

1. ~~Minimising the potential for crime and anti-social behaviour by~~ Ensuring that development proposals design-out crime and ~~encouraging~~ **encourage** a mix of uses and natural surveillance of streets and spaces;
  2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
  3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
  4. Ensuring that development proposals take account of the need for resilience so that residential and business communities are better prepared for, and better able to recover from, emergencies ~~including promotion of business continuity measures~~ **fire, flood, weather, and other related hazards as set out in the London Risk Register.**
  5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must ~~prepare and~~ submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building **for all building users, including safe and dignified emergency evacuation.**
  6. **Ensuring that development proposals cater to community safety and security requirements particularly those of people more likely to experience crime and fear of safety, including women, girls, children, younger, older and disabled people.**
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## Reason for the policy

6.2.1. **The City is a safe place to live, work and visit, with low rates of crime.** Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation between the City Corporation, **neighbouring boroughs**, the City of London Police, **NPSA** and the London Fire Brigade, and between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London **taking into account the Mayor's Vision Zero Action Plan to eliminate deaths and injuries on city streets. The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership publishes a Strategic Plan and its vision is for the City of London to be a safe place to live, learn, work, and visit.** Close working with developers and occupiers is also essential.

## How the policy works

6.2.2. Security and fire safety features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the development process or following completion. Early engagement with the City Corporation, the City of London Police and the London Fire Brigade is particularly important, including through the pre-application process.

6.2.3. The design of a scheme should create safe, **inclusive** and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience. Where appropriate, developers will be required to contribute towards the funding of measures designed to enhance security.

6.2.4. All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which sets out how the development will address fire safety in the design, construction and operation of the building.

## **Policy SA1: Crowded Places Publicly accessible locations**

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All major developments are required to address the issue of **crowded places publicly accessible locations** and counter-terrorism by:

- 4** Conducting a full risk assessment ~~and identifying and designing appropriate mitigation measures into the building as integral features from the outset to avoid the need for retrofitting;~~



2. Undertaking early consultation with the City of London Police on risk mitigation measures; **and**
  3. Restricting or rationalising motor vehicle access where required.; **and**
  4. ~~Ensuring that public realm and pedestrian permeability is not adversely impacted, and that the design of the development considers the application of Hostile Vehicle Mitigation measures at an early stage.~~
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#### Reason for the policy

- 6.2.5. Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.
- 6.2.6. Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development, the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism. **Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach.**
- 6.2.7. ~~Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach. Other measures that have been taken in the City include the City of London Traffic and Environmental Zone, which is the security and surveillance cordon that surrounds the Square Mile. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City. In 2016, the City Corporation also approved an Anti-Terrorism Traffic Regulation Order (ATTRO), a counter-terrorism measure that allows the City of London Police to close routes at certain times, specified in the order, and divert vehicles away from the area to deal with identified threats. Its purpose is to avoid or reduce the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism.~~

#### How the policy works

- 6.2.8. A risk assessment should be submitted for approval by the City Corporation as part of a planning application for major development or transport proposals. The risk assessment should be proportionate to the nature of the risk identified through consultation with the City of London Police and will typically include:
- Assessment of the risk of structural damage from an attack;
  - Identification of measures to minimise any risk;
  - Detail on how the perimeter is treated, including glazing;
  - Consideration of adjacent land-uses and commuter routes.



6.2.9. The City Corporation will liaise with the City of London Police in considering and approving risk assessments submitted as part of a planning application.

## **Policy SA2: Dispersal Routes**

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Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of **all** people, minimise the potential for over-crowding and reduce the instances of noise nuisance and anti-social behaviour, particularly in residential areas **and near noise sensitive uses and developments such as health facilities and schools.**

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### Reason for the policy

6.2.10. The City increasingly operates on a 7 day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

6.2.11. The City's daytime population places pressure on the City's public realm at peak times. It is therefore necessary to provide details of dispersal routes as part of planning applications for major commercial developments to understand their implications for movement and amenity.

6.2.12. The planning and design of dispersal routes should **be inclusive and** take into account the needs of **disabled** people, **older people, people with impaired mobility and people with children** ~~with physical or mental disabilities and people with restricted mobility.~~

### How the policy works

6.2.13. The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy CV4: Evening and Night-time Economy.

6.2.14. Major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid over-crowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.

6.2.15. A management statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help

ensure that the measures contained in the management statement are appropriate to local circumstances. Assessment of the management statement will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

### **Policy SA3: Designing in Security**

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1. Security measures must be incorporated into the design of development at an early stage, taking account 'secured by design' principles, to avoid the need to for later retrofitting and measures that would adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. ~~All development should be designed to minimise the need for~~ Where it is required, Hostile Vehicle Mitigation (HVM) should be integrated into the design of the building. Development proposals should avoid the need for HVM on the public highway and public realm. In exceptional circumstances, where non-integrated HVM is shown to be necessary, consideration should be given to the use of trees, planters and benches to reduce its visual impact. Design and location of any HVM should ensure that public realm and pedestrian permeability is not adversely impacted, and should be designed to ensure an inclusive and accessible public realm.
4. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, or within a wider area where area-based security measures are proposed.
5. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
6. All security measures which are expected to be more than very short-term should take account of the functionality of the area and needs of its users and should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design.
7. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.
8. Security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design.

## Reason for the policy

6.2.16. Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and may be applicable to crowded spaces around a development as well as the building itself. Security measures should be proportionate to the risk and the likely consequences of an attack, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage. **Given the limited space within the City, and the density of development, it is important that any required HVM is an integral part of the design of new development, and that it does not disrupt the permeability, accessibility and enjoyment of public spaces for everyone.**

## How the policy works

6.2.17. All new developments must incorporate appropriate security provision to reduce the risk and the likely impact of an attack. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features for individual buildings on the public highway should be a last resort when all other alternative proposals have been exhausted including the scope for an area-based approach.

6.2.18. A collective approach to security is likely to be more effective than an individual building approach, particularly in areas of high-density development such as the City Cluster. The City Corporation will use s106 planning obligations requiring developers to contribute to measures to enhance collective security, where appropriate.

6.2.19. In considering the impact of new development on the public realm, the City Corporation will take into account the need for additional security measures within the public realm to reduce the risk to individuals from motor vehicles and the potential for vehicles to mount pavements. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, through the use of s106 planning obligations.

6.2.20. Developments should aim to achieve a high level of natural surveillance of all surrounding public areas including the highway. Mixed use developments can generate greater activity and surveillance, but a mix of uses within individual buildings may give rise to problems of security, management and amenity. The provision of independent primary and secondary access points will be required so that proposed uses are separate and self-contained. In appropriate circumstances, use of CCTV should be considered.

6.2.21. Early engagement with the City of London Police and the City Corporation is essential to ensure that security measures are appropriate to evolving threats.

Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.

6.2.22. Design and Access Statements should incorporate recommendations from the City of London Police, City Corporation and 'Secured by Design' principles or equivalent, setting out how [an inclusive approach to](#) security has been considered at the design stage. Advice in the City Corporation's Public Realm Technical Manual should be incorporated into proposals to ensure developments offer a lasting contribution to the streets and spaces of the City.

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# 7. Housing

## 4.1 Housing

### Context

- 7.1.0. Housing is vital for the City's future economy and its communities. A shortage of housing, particularly affordable housing, is one of the main barriers to future business and community growth in the City and across London. High quality, affordable housing is also essential to meet the housing needs of those of the City's communities on lower incomes.
- 7.1.1. The 2021 Census indicated that the City's permanent residential population of the City was estimated to be around was 8,600, which is small in comparison to the daily working population in excess of 520,000 590,000. The GLA's 2016 2021-based interim housing-led projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 10,000 by 2036 9,500 by 2040. As the City's housing stock increases the resident population does not increase in proportion as many residential units are used as second homes or for short term letting. The 2011 2021 Census indicated that there were 1,400 1,700 second homes in the City of London.
- 7.1.2. The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential areas are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2016 2023. There have also been a number of developments providing shorter term accommodation (short lets or serviced apartments).
- 7.1.3. The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London. The City Corporation provides over 1,800 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City. The City Corporation has a current waiting list of 977 (in 2023), 175 of which are existing tenants who are insufficiently housed.
- 7.1.4. Most Clustering new residential housing development has been located in or near existing residential areas in accordance with Local Plan policy. This allows greater opportunity to protect residential amenity and deliver a high-quality residential environment. Residential clustering reduces potential conflict with

commercial and office uses. There may be occasional opportunities for new residential development on appropriate sites near identified residential areas, such as through the re-use of heritage assets, where the potential to meet future office needs may be limited by site-specific considerations.

7.1.5. References to housing in this Plan include market and affordable housing (comprising social rented housing, affordable rented housing and intermediate housing), hostels, sheltered and extra-care housing. It also includes [innovative housing products, such as](#) Built to Rent and Co-Living accommodation which are likely to have an increasing role in meeting future housing needs, particularly for City workers at an early stage of their careers. References to housing in this Plan do not include student accommodation, as it may be appropriate in different locations to other forms of housing.

7.1.6. [Co-Living accommodation will contribute towards meeting general housing need at the national ratio for non-self contained accommodation of 1.8 bedrooms to 1 residential unit.](#) Student ~~housing~~ accommodation contributes to meeting general housing need at the national ratio of 2.5 student rooms to 1 residential unit.

### Housing requirement

7.1.7. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs.

7.1.8. The London Plan's strategic framework includes Policy SD5 which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context, [the London Plan is informed by a Strategic Housing Land Availability Assessment \(SHLAA\) for London, providing guidance on the amount of land potentially available in the City for residential development. The 2017 SHLAA identifies a potential supply of large housing sites in the City in the period 2019-2029 of 527 dwellings and an annual average of 74 dwellings on sites under 0.25 hectares, based on past trends. In line with the findings of the SHLAA, the London Plan](#) ~~requires~~ the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. [This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan's target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets, ~~with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. In Policy S3 the City's housing requirement is expressed as a total of 2,482 dwellings for the Plan period to 2036 which represents the 10-year London Plan target of 1,460 dwellings plus the combined annual average of 146 dwellings for the years post 2028/29 \(1,022 dwellings\). The housing requirement beyond 2028/29 will be kept under review and may need to be altered to ensure~~](#)



~~general conformity with any subsequent review of the London Plan. The London Plan also includes a target that 740 units should be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period.~~

7.1.9. Different assessment methods provide different figures for local housing need.

~~The City's 2016 SHMA assessed the level of housing need, including the needs of those requiring supported and specialised accommodation in the City, over the period 2014-36 using the latest population and household projections. The SHMA identified an objectively assessed need for an annual average of 126 dwellings per year. Using the national standard method for assessing local housing need at the time of preparing this Plan, the City's minimum annual local housing need figure over the ten-year period from 2020 to 2030 would be ~~112~~ 102.~~

7.1.10. The City Corporation recognises that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the national standard method. ~~City's SHMA.~~ This Local Plan therefore seeks to meet the City of London's London Plan housing target **between 2025/26 and 2029/30 (an average 146 dwellings per annum) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40 (an average of 102 dwellings per annum) This gives a total housing requirement of 1,706 dwellings, and can be expressed over three periods of five years.** ~~which has been applied to the whole of the Local Plan period as explained above.~~

- **2025/26 to 2029/30: 686 dwellings**
- **2030/31 to 2034/35: 510 dwellings**
- **2035/36 to 2039/40: 510 dwellings**

7.1.11. Housing delivery in the City is impacted by the volatile nature of the wider London housing market. If past volatile trends continue, new housing delivery in the City is likely to fluctuate from year to year and monitoring and delivery performance should therefore be assessed against overall delivery both in the period up to 2028/29 for the London Plan and up to 2040 for the City's wider housing target, rather than on an annual basis. **The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan has prepared a Housing Trajectory which shows that the supply of small and larger windfall sites, together with sites in the development pipeline, will provide sufficient capacity to meet the London Plan by 2028/29.**

7.1.12. The City Corporation's Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through 'windfall' development rather than through the allocation of sites. City Corporation monitoring shows that in the period

2011/12 to ~~2022/23~~ ~~2021/22~~, completions and permissions on windfall sites will have delivered an annual average of ~~175~~ ~~198~~ dwellings per year. It is anticipated that windfalls will continue to deliver ~~sufficient~~ ~~the majority of~~ housing ~~to meet the housing requirement in the City Plan~~. The City Corporation has published a ~~brownfield land register on its website, identifying land that is suitable for residential development in accordance with government requirements. The Mayor of London prepares a Strategic Housing Land Availability Assessment (SHLAA) for London, providing guidance on the amount of land potentially available in the City for residential development. The 2017 SHLAA prepared to inform the draft London Plan 2017 identifies a potential supply of large housing sites in the City in the period 2019-2029 of 527 dwellings and an annual average of 74 dwellings on sites under 0.25 hectares, based on past trends. This provision would be sufficient to meet London Plan housing targets up to 2029. Beyond and up to the end of the Local Plan period, it is expected that further windfalls will come forward to ensure that the City can meet its housing requirements for the longer term. In the event that monitoring demonstrates that insufficient housing land is coming forward, the City Corporation will review this Plan or bring forward a partial review relating to housing land supply. The City Corporation will continue to support the delivery of new market and affordable housing on its own estates and other appropriate land holdings outside of the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London's wider housing needs.~~

7.1.13. ~~The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London. The City Corporation provides over 1,800 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City.~~

7.1.14. The City Corporation has committed to play a leading role in tackling the housing shortage in London with a pledge to build hundreds of new social homes and thousands of additional mixed tenure homes. The City Corporation aims to deliver at least 700 new social homes on City-owned land and housing estates with potential for renewal and expansion. Where these homes are outside of the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a ~~further 3,000~~ **significant number of additional** mixed tenure homes on other sites in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs. ~~The City Corporation's plans to build new homes have encouraged both public and private sector partners to propose development opportunities and potential joint ventures. Options to increase the supply of new homes beyond the City Corporation's own sites are being explored.~~ The ~~planned~~ co-location of the City Corporation owned and managed wholesale markets (Smithfield Meat Market, Billingsgate Fish Market and New Spitalfields Fruit and Vegetable Market) onto one site in Dagenham would provide an opportunity for mixed use redevelopment which could include housing.



~~Billingsgate is a 5-hectare site next to Canary Wharf and New Spitalfields is a 13-hectare site in Leyton.~~

## Affordable Housing

7.1.15. The City of London ~~is~~ **can be** an expensive area to live in. ONS data shows that the affordability ratio of lower quartile house prices to lower quartile residential earnings in ~~2016~~ **2021/22** was ~~17.51~~ **14.25**, above the London average of ~~13.32~~ **13.46** and the England average of ~~6.91~~ **7.28**. The City of London SHMA shows that **market** rental prices in the City were significantly above the London-wide average or the average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests ~~a need for an additional 69~~ affordable dwellings ~~per year~~ **should be maximised** to meet affordable housing needs.

## Gypsy and traveller accommodation

The London Plan indicates that, in the absence of an up-to-date local gypsy and traveller needs assessment, boroughs should use the need figure set out in Table 4.4 of the London Plan. This table indicates that there is no need for specific gypsy and traveller accommodation in the City of London. The City Corporation will work with the Mayor and London Boroughs in the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment.

## Strategic Policy S3: Housing

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The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City's needs by:

1. Making provision for a minimum of ~~2,482~~ **1,706** net additional dwellings between ~~2019/20 and 2035/36~~ **2025/26 and 2039/40**:
  - encouraging new housing development on appropriate sites in or near identified residential areas;
  - **within identified residential areas, prioritising the delivery of affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing, while recognising that for-sale market housing would be likely in some instances to have a role to play in making housing development viable;**
  - protecting existing housing where it is of a suitable quality and in a suitable location;
  - exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and
  - refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2.
2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by:

- ensuring the delivery of a minimum of 50% affordable housing on public sector land; and
  - requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash-in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and
  - providing **a an appropriate** mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.
3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
  4. Ensuring that other new land uses within identified residential areas are compatible with residential amenity.
  5. Requiring **at least** 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and **90% of all other** new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
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#### Reason for the policy

- 7.1.16. London has a severe housing shortage caused by a growing population and an inadequate supply of housing units. 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. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still ensuring that the City remains predominantly a commercial office centre of national importance. ~~New and innovative models of providing housing, including Build to Rent and Co-living, will be encouraged to meet changing housing needs.~~
- 7.1.17. New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Suitably located housing in the City can address local housing need **(in 2023 there were 977 people on the City Corporation's housing waiting list)** and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.
- 7.1.18. The London Plan ~~includes a~~ detailed Policy H11 ~~which~~ supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting, is typically owned by institutional investors, offers the potential for longer term returns for investors and importantly, longer lease terms and security for tenants. The City Corporation will support Build to Rent in or near the City's residential areas and where it meets the detailed requirements in the London Plan.

- 7.1.19. The City Corporation considers that there is potential within or near the identified residential areas for co-living accommodation and will encourage such provision on appropriate sites. Co-living accommodation will typically provide private ensuite bedrooms, shared social and kitchen spaces and co-working spaces with the latest smart technology. They are often suitable for people at early stages of their career when their ability to afford self-contained accommodation may be limited.
- 7.1.20. Where appropriate, the City Corporation will support the appropriate regeneration of residential estates in the City where it will deliver improved living conditions for existing tenants and provide additional housing to meet housing needs.
- 7.1.21. Many households in London already require accessible or adapted housing to lead dignified and independent lives. More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving to alternative accommodation.

#### How the policy works

- 7.1.22. To ensure that permissions for new housing are built out in a timely fashion, developers should provide information on the expected completion date for new residential development. The City Corporation will keep this under review and expect developers to liaise with the Corporation where it becomes apparent that anticipated completion dates cannot be achieved.
- 7.1.23. There is a presumption in national policy and the London Plan that new affordable housing associated with housing development should be provided on-site. The City Corporation will expect developers to deliver on-site affordable housing in new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable and that off-site provision would better deliver mixed and inclusive communities than on-site provision.
- 7.1.24. The City Corporation requires commercial development to make a financial contribution towards off-site affordable housing delivery instead of delivering mixed use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.
- 7.1.25. Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace to strengthen its strategically important business role. The City Corporation therefore also works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation-owned housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. Although some affordable housing provision outside the City will continue to be funded by contributions from commercial development in the City, the presumption in this

Plan is that new housing development in the City should provide affordable housing on-site.

- 7.1.26. The London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance ([SPG](#)) set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m<sup>2</sup>. The Mayor has adopted a threshold approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, or 50% on public sector land, are not required to submit viability information. Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses.
- 7.1.27. In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. On public sector owned land, the higher 50% target [will be applied as](#) set out in the London Plan [will be applied](#). The presumption is that affordable housing provision should be made on-site and all sites will be expected to deliver at least the minimum required level of affordable housing. Off-site provision or cash in lieu contributions will only be accepted in exceptional cases. In exceptional cases where off-site provision or cash in lieu contributions are considered to be acceptable in principle, [agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include review mechanisms in line with the Viability Tested Route, as set out in the London Plan. This means that](#) the off-site provision, or the financial contribution, will be set at a level which captures the full uplift in value when delivering 100% market housing. This will ensure that the development is not more viable when the affordable housing obligation is satisfied through off-site provision or a cash in lieu payment in comparison to on-site delivery. The level of off-site provision, or the amount of the cash in lieu payment, must be sufficient to deliver at least the same number, size and type of affordable homes that would be required on-site. Further guidance on affordable housing requirements, including the methodology for calculating the level of cash-in lieu or off-site contributions required [will be is](#) set out in the City Corporation's Planning Obligations SPD. This [SPD guidance](#) will be kept under review and amended as required to ensure financial contributions keep pace with the cost of delivering affordable housing and will continue to be sufficient to meet the full affordable housing requirements set out in this Plan.
- 7.1.28. Developments [which-that](#) propose lower levels of affordable housing, or where a developer considers particular circumstances exist that make a policy compliant scheme unviable, will need to be supported by robust viability assessments. These assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will commission an independent review of submitted assessments, with the cost being met by the applicant. Consideration of viability and overall levels of affordable

housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.

- 7.1.29. The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. Overpaying for a site ~~will~~ is not ~~be regarded~~ an appropriate justification for failing to meet the affordable housing target.
- 7.1.30. Where a viability assessment [for a development](#) demonstrates that the Plan's affordable housing targets cannot be met, the **level of contribution should be determined based on the maximum amount of affordable housing at the relevant tenure split that could be provided on-site, as assessed through viability assessments.** ~~City Corporation will require an upwards only review mechanism to be included within any s106 planning obligation to ensure that any increases in scheme value or reduction in cost are appropriately reflected in increased affordable housing contributions.~~ The detailed wording and timing of these review mechanisms will be determined on a case by case basis, having regard to the City Corporation's Supplementary Planning Document [and London Plan](#) Guidance prepared by the Mayor ~~in support of the London Plan~~.
- 7.1.31. Various types of affordable housing are included within the national definition of affordable housing. The London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes.
- 7.1.32. The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible.

## **Policy HS1: Location of New Housing**

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1. New housing will be encouraged on suitable sites in or near identified residential areas. Within these areas a mix of ~~appropriate~~ residential, commercial, [community, cultural](#) and other uses will be permitted.
2. New housing must not:



- prejudice the primary business function of the City. Where proposed development would, or result in the loss of viable office accommodation, contrary to floorspace it must meet the requirements of Policy OF2;
  - inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
  - result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.
3. Where existing residential estates are being redeveloped, an increased number of residential units will be expected, and the existing affordable housing on-site must be re-provided with at least the equivalent floorspace and tenure of affordable housing. Affordable housing which is re-provided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.
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#### Reason for the policy

- 7.1.33. The City is a busy and sometimes noisy place, with a high density of development and business activity at all times during the day and evening, 7 seven days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because it could have an adverse impact on the City's primary business role and would be likely to have poor residential amenity. The London Plan indicates that residential development is inappropriate in identified parts of the City to ensure that the current and future potential to assemble sites and deliver office development is not compromised by residential development. Elsewhere in the City, the London Plan indicates that offices and other strategic functions of the Central Activities Zone (CAZ) should be given greater weight in planning terms than residential development, except in wholly residential streets or predominantly residential neighbourhoods.
- 7.1.34. The City's policy approach is therefore to encourage new housing to be located within or near the identified residential areas shown in Figure 7, where reasonable residential amenity consistent with a central London location can be achieved. This approach helps to minimise disturbance to residents within the areas, while reducing potential conflict with the development and operation of commercial uses and providing a suitable framework for delivery of additional housing in the City.
- 7.1.35. Due to the size and unique character of the City, all new housing has previously come forward on 'windfall' brownfield sites through the redevelopment or conversion of existing buildings as opportunities arise, within a similar policy framework to the one in this City Plan. This pattern of housing delivery is projected to continue throughout the life of this new Plan, delivering sufficient new housing over the Plan period to meet London Plan targets and projected local housing need. There is no need to allocate sites in the Local Plan to meet housing targets.

## How the policy works

7.1.36. The policy sets out those parts of the City that are suitable for housing, specifically in and around established identified housing areas. In reality, the majority of proposals for new housing in and around these areas would be likely to be on sites occupied by office uses. It is therefore important to read this policy in conjunction with policy OF2. ~~To accord with office floorspace policy OF2., applicants proposing redevelopment involving the loss or change of use of existing office accommodation must provide robust evidence to demonstrate that the site is not suitable and viable for longer term office use and the proposal will not prejudice the primary business function of the City. However, the City Corporation will take a more flexible approach to the loss of office floorspace in appropriate circumstances where development within or near the residential areas will provide additional housing. This could be particularly appropriate where the proposed housing offers Build to Rent, or Co-Living accommodation suitable for workers at an early stage of their careers. Further details are set out in the Office Use SPD.~~

7.1.37. Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted which demonstrates how the development will mitigate the impact of that noise and pollution.

7.1.38. Regeneration of housing estates will often involve the redevelopment of existing homes. Regeneration schemes should deliver an increased number of dwellings, where this is compatible with the delivery of a high-quality living environment for existing tenants. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. **Tenants should be involved at all stages of the process and have the opportunity to shape the proposals. Regeneration schemes should seek opportunities to improve social infrastructure and open spaces within the estate.** This will help protect established local communities.

## **Policy HS2: Loss of housing**

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The net loss of existing housing units, including the amalgamation of residential units, will not be permitted except where:

1. they provide poor amenity to residents which cannot be improved; or
2. they do not have a separate entrance; or
3. exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

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## Reason for the policy

7.1.39. The net loss of existing housing units will be resisted because of the limited opportunities to replace it in the City. This policy will also be applied to proposals for the amalgamation of adjoining residential units unless the existing accommodation is of such poor quality that it cannot provide a reasonable standard of amenity, or the proposed **amalgamation of no more than two units** would meet a clearly identified need for larger family accommodation **or for retirement purposes**. Exceptionally the net loss of existing housing may be acceptable outside residential areas where the development of offices will have a significant beneficial impact for the City. Isolated residential units outside identified residential areas can suffer poor amenity, such as noise nuisance and other disturbance due to non-residential uses in close proximity, including clubs and pubs, and can be adversely affected by the operation of the business City.

7.1.40. **Development sites that have received planning permission for residential units, and which demonstrate that there is a deliverable housing element, will be refused permission for change of use to non-residential use.**

### **Policy HS3: Residential environment**

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The amenity of existing residents will be protected by resisting uses **which that** would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements.

1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity.
  2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation. **Light spill from development that could affect residential areas should be minimised, in line with policy DE9.**
  - ~~3. All residential development proposals must accord with the 'Agent of Change' principle, demonstrating how potential adverse noise impacts on and between dwellings will be mitigated by layout, design and materials. This principle is applicable when new housing proposals might otherwise constrain existing uses.~~
  4. The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.
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### **Reason for the policy**

7.1.41. The City is predominately a centre of business, with activity taking place at all times during the day and evenings, 7 days a week. This sometimes results in noise and disturbance to residents from new commercial development and commercial activities nearby. While the City Corporation will endeavour to minimise noise and



other disturbance to residents it is inevitable that living in such a densely built-up area will result in some disturbance from a variety of sources, particularly outside the identified residential areas.

7.1.42. The need to minimise overlooking and overshadowing of residential accommodation **and minimise light spill where it impacts on residential accommodation**, is a consideration in the design and layout of both new residential buildings and other development. However due to the density of development in the City it may not always be possible to entirely avoid any impacts on amenity.

#### How the policy works

~~7.1.43.~~ The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas. ~~Policy CV4 addresses evening and night time economy uses, while Policy HL3 seeks to minimise noise and light pollution.~~

~~7.1.44. New residential development will also be subject to the Agent of Change principle and should include sufficient mitigation to ensure that the amenity of prospective owners or tenants is not compromised by existing uses in the vicinity.~~

#### **Policy HS4: Housing quality standards**

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All new housing must be of a high-quality design and of a standard that facilitates the health and wellbeing of occupants and neighbouring occupants, and:

- ~~1.~~ meets London Plan housing space standards, **including outdoor space standards and amenity space for individual units;**
  2. meets standards for Secured by Design or similar certification;
  3. maximises opportunities for providing communal open and leisure space for residents; ~~and~~
  - ~~4. provides amenity space for individual units, where possible including outdoor space.~~
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#### Reason for the policy

7.1.45. All new housing, including changes of use to housing from other uses, will be expected to provide well designed, high quality living environments, both internally and externally, incorporating principles of inclusive, secure and sustainable design.

#### How the policy works

7.1.46. Housing development should comply with the requirements in the London Plan ~~and the Mayor's London Housing Design Guide unless it would not be feasible to do so because of site specific factors.~~ The layout should incorporate sufficient space and facilities for waste, recycling bins and disabled and cycle parking.

7.1.47. Private outdoor space should be provided in line with London Plan standards. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. ~~A minimum of 5 sq.m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m should be provided for each additional occupant.~~ Play space should also be included in line with the requirements in Policy HL8. There should be no distinction between amenity spaces and play areas for private and affordable housing residents. Proposals which seek to restrict access to such areas by affordable housing tenants will be refused. ~~Daylight and sunlight to dwellings is addressed in the Design section of the Plan.~~

### **Policy HS5: Short term residential letting**

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1. Short term letting of permanent residential premises for over 90 days in a calendar year will not normally be permitted as it would reduce the stock of permanent housing in the City and may adversely impact the amenity of existing residents.
  2. Short term letting to provide residential accommodation for commercial purposes will not be permitted unless the units are contained within a separate building and will not be permitted if mixed with permanent residential accommodation.
  3. Where short term residential letting is permitted for commercial purposes, conditions will be imposed to prevent any later changes to permanent residential use in unsuitable accommodation or locations.
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#### Reason for the policy

7.1.48. The City of London is primarily a commercial office centre. There is a small stock of permanent residential properties, and this stock needs to be maintained and increased to ensure that the City can continue to meet its assessed housing need. Loss of residential accommodation to short-term letting would reduce the overall stock of permanent housing and the City's ability to meet its housing need. At the same time, there is some demand for residential accommodation that can be let on a short-term basis to provide for the needs of the City's business community, particularly for visiting workers. Such short-term accommodation has a role to play but should not be mixed with permanent residential accommodation as it can impact the amenity of neighbours.

#### How the policy works

7.1.49. Under the Deregulation Act 2015, short-term letting for less than 90 days in a calendar year of domestic premises liable for council tax does not require planning permission. Letting for periods of more than 90 days in a calendar year would require permission.

- 7.1.50. Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and adversely impacting on the amenity of existing residents.
- 7.1.51. Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy HS1.
- 7.1.52. ~~The provision of short term lets for commercial purposes can help to meet the accommodation needs of business visitors. Such letting can have significant impacts on the amenity of neighbours by reason of noise, disturbance, and occasionally anti-social behaviour.~~ Where ~~such accommodation is proposed~~ **short term lets are** proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.
- 7.1.53. The requirement for the provision of affordable housing in Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

#### **Policy HS6: Student ~~housing accommodation~~ and hostels**

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1. Proposals for new **Purpose-Built Student Accommodation (PBSA)** and hostels should support the City of London's primary business function and the vibrancy of the Square Mile. They will only be permitted where:
  - **they would meet high standards of design and amenity for occupants;**
  - **there are appropriate amenities for occupants in the local area;**
  - **they are well connected to relevant further or higher education institutions;**
  - **they would not** prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2;
  - **they would not** have an adverse impact on the residential amenity of the area; and
  - **they would not** involve the loss of permanent residential accommodation.
2. Proposals for ~~Purpose-Built Student Accommodation (PBSA)~~ should be supported by identified further or higher educational institutions operating in the City of London or the Central Activities Zone.
3. 35% of student accommodation on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
4. The loss of existing student **housing accommodation** and hostels to other suitable uses which are in accordance with Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is

evidence that student accommodation is impacting on residential or business amenity.

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#### Reason for the policy

7.1.54. The demand for student accommodation in London continues to grow. Higher education provision is a key part of London's attractiveness as a World City and supports the City of London's commercial role. However, opportunities for residential development in the City are limited and student [housing accommodation](#) may represent an opportunity lost to meet other housing needs in residential areas.

#### How the policy works

7.1.55. New Purpose-Built Student Accommodation (PBSA) should be supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the Central Activities Zone through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation.

7.1.56. The Housing Delivery Test establishes a national ratio that every 2.5 student bedrooms in PBSA meet the same housing need as one conventional housing unit and contribute to meeting the City's housing target at this ratio.

7.1.57. ~~National space and accessibility standards do not apply to Student accommodation but other Plan policies require inclusive and high quality design which will assist in ensuring the needs of students with disabilities are accommodated, like all development in the Square Mile, should meet the highest standards of accessibility and inclusive design. To help achieve this, the appropriate proportions of accessible rooms should be provided, in line with guidance issued by the Greater London Authority, which advises that the relevant part of London Plan Policy E10 Part H applies to development proposals for new non-self-contained student accommodation.~~

7.1.58. ~~Student accommodation should be built to a high standard, including appropriate sunlight and daylight levels.~~

7.1.59. New student accommodation must not impact adversely on the amenity of existing residents or occupiers, either individually or cumulatively with other student accommodation developments. ~~Developers will be expected to proactively liaise with local residents and businesses to manage the impacts of the development and offer mitigation solutions. Applicants will be required to submit Management Statements detailing how amenity issues will be addressed. The Agent of Change principle will apply to new student accommodation.~~

7.1.60. Hostels can contribute to providing accommodation for [vulnerable](#) homeless people. The City Corporation's Homelessness Strategy outlines how the

Corporation will seek to reduce the incidence of rough sleeping in the City through collaborative working with outreach services, health services, the City of London Police, businesses and others. The Strategy seeks to provide appropriate accommodation options for homeless people, including through the use of s106 contributions to deliver new affordable housing or hostels. Hostels may be acceptable within or near identified residential areas, where the amenity of existing occupiers is protected.

### **Policy HS7: The Temples**

~~Within the Temples adjustments between professional and residential accommodation will be permitted where:~~

- ~~• the overall balance of residential and professional chambers is maintained;~~
- ~~• it is important to the functioning or character of the Temples, or to the continuing use of their buildings.~~

#### Reason for the policy

~~7.1.61. The Inner and Middle Temples are two of the Inns of Court which provide accommodation for the legal profession in the southwest of the City between Fleet Street and the River Thames. Along with other nearby Inns of Court and the Royal Courts of Justice in Westminster, the Temples form part of a specialist legal cluster recognised in the London Plan.~~

~~7.1.62. The Temples mainly contain barristers' chambers, together with other accommodation for Members of the Bar. The Inner and Middle Temples have a strong collegiate atmosphere due to the mix of residential and commercial uses. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.~~

#### How the policy works

~~7.1.63. In determining applications, the City Corporation will have regard to the importance of the continued existence of residential, office and support uses in the Temples and the contribution that this makes to their special character. However, the need to rationalise and refurbish chambers in order to maintain an efficient business and professional community is recognised.~~

### **Policy HS7: Older persons housing**

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The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:

- 1. Making provision for a minimum of 170 Seeking to provide a minimum of 86 net additional dwellings for older persons between 2019/20 and 2035/36 2023 and 2040 supporting development that meets the specific needs of older people;**
- supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;

3. ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and
  4. resisting development that involves the net loss of housing for older people.
- 

#### Reason for the policy

7.1.64. The City of London has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for ~~67~~ **86** specialist older person units over the life of the Plan, **however this figure does not take into account older people who choose to stay in their own homes and access personalised care.** ~~and~~ The London Plan has an indicative figure of 10 units per year.

#### How the policy works

7.1.65. The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet identified needs. Housing suitable for older persons, including sheltered housing, is provided by the City Corporation on its land and estates, inside and outside of the City. Provision outside the City may assist in meeting the need for older persons housing for City residents through nomination rights. Specialist older persons housing should deliver affordable housing in line with Policy S3. ~~Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. This issue is addressed in Policy VT3.~~

### **Policy HS8: Self and custom housebuilding**

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The City Corporation will encourage the provision of self and custom build units within large residential schemes.

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#### Reason for the policy

7.1.66. The Self Build and Custom Housing Building Act 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The City Corporation launched its own register for prospective self-builders in 2016.

#### How the policy works

7.1.67. There are no large areas of unused land in the City of London that would provide an opportunity to create serviced building plots. Furthermore, self-build and custom-build are likely to involve lower density development, which would conflict with policies in the Plan which seek to maximise housing supply. Given these

constraints, the City Corporation considers that the best prospect for bringing forward suitable land will be in conjunction with large housing developments ~~where units can be built to shell and core and individually fitted out.~~

DRAFT



# 8. Offices Support a Thriving Economy

## 8.1. Offices

### Context

The City is London's historic business core and today represents the largest concentration of office-based employment in the capital. It forms a world leading international financial and professional services centre, renowned for its financial, insurance and legal sectors which are the main office occupiers. The City is seeing a rapid increase in serviced offices and co-working providers, which offer more flexible workspace options and attract a more diverse range of occupiers including technology, creative enterprise and media companies.

The whole of the City forms the business cluster and is suitable for commercial development. There are, however, residential areas within the City where a mixture of residential and commercial uses will be permitted (see Policy S3).

There were 23,580 businesses and 522,000 workers in the City in 2018 and employment is projected to continue to grow over the long term. Over 98% of all the City businesses are Small and Medium Enterprises (SMEs) with fewer than 250 employees; 80% have fewer than 10 employees.

The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business.

The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. Prior to the Covid-19 pandemic, the GLA project that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will also create demand for more employment and for the space required to accommodate it.

The Covid-19 pandemic is having significant health, wellbeing, social and economic impacts globally. The City of London has not been immune to these impacts and has seen a significant shift in working patterns to flexible and remote working, with major reductions in City footfall and use of the City's retail, leisure and cultural assets, flexible working patterns are likely to continue in some form for most businesses and employees post Covid, within a blended approach to office working. The likely reduction in office occupation densities due to Covid presents an opportunity for City offices and businesses to reinvent themselves and the way that they work. Economic modelling by the GLA suggests a gradual return of economic activity and a return to economic and employment growth. At the same time, the fundamentals underpinning the City's success, its locational advantages



and the benefits of collaboration and cooperation remain. Alongside continued investor and developer interest in the City as a place in which to do business, these fundamentals suggest that the City will continue to prosper and, over the life of this Plan, will see further employment growth and a need for additional office, creative and collaboration space.

The United Kingdom's exit from the European Union will also have short and long-term effects on economic and employment growth depending on the detail of future trading arrangements.

The Corporation will continually review employment and office growth trends and the economic impacts of the Covid-19 pandemic and the UK's departure from the European Union and will bring forward a review of this Plan to address changing trends, where necessary.

## Strategic Policy S4: Offices

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The City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by:

1. Increasing the City's office floorspace stock by a minimum of ~~2,000,000m<sup>2</sup>~~ 1,200,000 m<sup>2</sup> net during the period ~~2016 to 2036~~ 2021 to 2040, phased as follows:

<del>2016 – 2021</del>	<del>750,000m<sup>2</sup></del>
• 2021 – 2026	<u>750,000m<sup>2</sup></u> <u>500,000m<sup>2</sup></u>
• 2026 – 2031	<u>250,000m<sup>2</sup></u> <u>400,000m<sup>2</sup></u>
• 2031 – 2036	<u>250,000m<sup>2</sup></u> <u>200,000m<sup>2</sup></u>
• <u>2036 – 2040</u>	<u>100,000m<sup>2</sup></u>

2. Ensuring that new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations, and different types and sizes of occupiers, and to meet the needs of Small and Medium Enterprises (SMEs), ~~innovative~~, start-up companies, creative industries and those requiring move-on accommodation.
  3. Promoting the retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation.
  4. Where appropriate, encouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City.
  5. Protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City. Where necessary, conditions may be attached to permissions for new office floorspace to secure its long-term use for such purposes.
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## Reason for the policy

- 8.1.1. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business as well as providing agglomeration benefits. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth.
- 8.1.2. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of ~~2,000,000m<sup>2</sup>~~ 1,200,000m<sup>2</sup> is derived from the estimated growth in office employment between ~~2016 2021~~ and ~~2036 2040~~ and represents a ~~23%~~ 13% increase in floorspace. Capacity modelling demonstrates that there are sufficient sites to meet this demand, provided primarily within the City Cluster area, supplemented by additional capacity elsewhere in the City.
- ~~6. Notwithstanding the short term impacts of the Covid-19 pandemic on occupier demand and construction activity, the City has a robust development pipeline. In March 2020, approximately two-thirds of the total office floorspace target had either been completed since the baseline date of 2016 or was under construction. While the long term impacts of the pandemic on the office market are uncertain, flexible working has become a key part of the business environment and it seems likely that many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be counteracted by a shift towards lower occupation densities and the provision of more breakout space within offices. The overall impact on floorspace demand may therefore be broadly neutral.~~
- 8.1.3. The demand target is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central target is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
- 8.1.4. Recent years have also seen strong demand for 'best in class' or Grade A+ floorspace. Many businesses are placing greater value on high-quality sustainable and well-being credentials, quiet spaces for phone calls or working, abundance of meeting spaces and places for collaboration, good access to public transport and food and beverage amenities as well as design that communicates the company's brand and values.
- 8.1.5. Office floorspace need will be met through the delivery of new office space and through the refurbishment and retrofit of existing space to comply with current office floorspace standards and meet the Government-set requirements for minimum energy efficiency standards.

- 8.1.6. Traditional office based jobs are the dominant sector in the Square Mile, representing 59% (346,000) of all jobs in 2021, but emerging office-based firms are faster-growing, consisting of 41,600 new jobs (+62% between 2015 and 2021). There were 22,300 businesses and 590,000 workers in the City in 2021 and employment is projected to continue to grow over the long term. The City accommodates 440,000 office based jobs in an estimated 5.3 million m2 (Net Internal Area) of office space. Over 99% of all the City businesses are SMEs with fewer than 250 employees; 80% have fewer than 10 employees.
- 8.1.7. In ~~2016~~ 2023, ~~25%~~ 29% of take-up of office floorspace in the City of London was from media and tech firms, compared to ~~28%~~ 19% from financial companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. ~~In 2018, there were approximately 41,000 persons in the City employed in Creative Industries.~~ This broader range of occupiers is creating requirements for a broader range of office types.
- 8.1.8. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.
- 8.1.9. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. ~~At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City but~~ Developers **and building owners** are **also** encouraged to consider a range of leasing structures, including below market rents ~~where appropriate. The City Corporation is working closely with neighbouring boroughs~~ **to ensure that a range of affordable workspaces and move on accommodation needs can be accommodated** **are available to meet demand, in particular** ~~providing signposting and assistance to businesses in finding suitable office accommodation~~ **from new and emerging sectors of the economy and creative industries**. How the policy works
- 8.1.10. Strategic Policy S4 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.
- 8.1.11. The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first 2 phasing periods. ~~It is expected that 25% of the floorspace target will be achieved by 2026, with the remaining 75% in the latter phases.~~

8.1.12. The City Corporation has made an Article 4 Direction removing permitted development rights for the change of use of offices (~~B1a~~) **(E(g)(i))** to dwelling houses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan.

8.1.13. Changes to the Use Classes Order introduced in September 2020 mean that offices ~~could~~ **can** be converted to a range of other Class E commercial, business and service uses without planning permission. ~~Given that the largest past losses of office accommodation in the City have been to residential or visitor accommodation uses, this change is not expected to pose a significant risk to the City's strategic role as a centre for financial and professional services. However,~~ Where permission is granted for office schemes that meet a specific identified need, conditions may be attached to ensure the impacts of any proposed later conversion of such space can be considered through the planning application process.

## **Policy OF1: Office Development**

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1. Office development should:

- **Prioritise the retrofitting of existing buildings;**
- be of an outstanding design and an exemplar of sustainability; ~~and~~
- be designed for future flexibility to future proof the City's office stock **and realise the principles of circular economy design approaches;**
- provide office floorspace suitable for a range of occupiers;
- **provide healthy and inclusive working environments that promote wellbeing;** and
- where appropriate, provide a proportion of flexible **and affordable** workspace suitable for micro, small and medium sized enterprises.

2. Other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for businesses, workers and residents.

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### Reason for the policy

8.1.14. A range of office floorspace is required to accommodate the future needs of the City's office occupiers and this should include provision for incubator, co-working and accelerator space, as well as provision for larger firms where required. Flexible **and affordable** office floorspace is required that can be easily adapted to meet changing workplace and technology requirements and the needs of a variety of office occupiers.

8.1.15. Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City's economy include retail, leisure, education, health facilities and cultural uses. A mix of commercial land uses, in particular at ground floor and

basement levels, may will be required to create active frontages enhancing an area's vitality and provide important complementary services. They also provide opportunities for creativity, collaboration and social interaction, which are key to the success of the City's business clusters. Some uses have the potential to undermine the functioning, servicing and use of offices, particularly in areas of high density employment and where offices are required to be serviced overnight.

#### How the policy works

- 8.1.16. Proposals for new office development should demonstrate design quality and flexibility to accommodate a range of businesses. Particular encouragement will be given to floorspace which meets the needs of small businesses, start-ups and incubator space. Office development should include a suitable mix of complementary commercial or other uses appropriate to the site and location and contribute to the creation of active frontages at street level. Where appropriate, conditions or legal obligations may be used to ensure the delivery of a range of affordable workspaces.
- 8.1.17. Many office lobbies have been designed to project a corporate image, and function as through space to access lifts. This can lead to a blank frontage on the street, especially with large windows on the façade with minimal internal activity and no public access. A lobby has the potential to be a more interesting and engaging space. Lobbies can be multifunctional spaces for interaction and provide spaces that contribute positively to the life of the City. The addition of publicly accessible facilities (including public toilets), co working spaces, breakout spaces, art gallery or cafes can create a more active lobby. Office buildings should include dynamic ground level uses to enhance their lobbies. Entrances should be easy to identify and should allow everyone to use them independently without additional effort, separation or special treatment. Revolving entrance doors are not accessible to a range of people.

#### **Policy OF2: Protection of Existing Office Floorspace**

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1. The loss of existing office floorspace will be resisted unless it can be demonstrated that:
  - the proposed development would not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City; and
  - the proposed development would not compromise the potential for office development on sites within the vicinity; and
  - there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.
2. Where the criteria in part 1 of this policy have been met, proposals that would lead to the loss of existing office floorspace may follow one of the following routes:

- a. Viability tested route: Proposed development will be required to demonstrate that the retention, refurbishment or re-provision of some or all of the office floorspace on the site would not be unviable in the longer term, demonstrated by a viability assessment; or
- b. Retrofit fast track: Proposed development will be required to retain the substantial majority of the superstructure of the existing building, lead to an improvement in the environmental performance of the building, and result in change of use to (one or a mix of) hotel use, cultural uses, and/or educational use. Partial retention of office floorspace will be encouraged;
- c. Residential areas route: the loss of office floorspace is proposed on a site within or immediately adjacent to identified residential areas and would result in the provision of additional housing;
- d. Ground floor uses: the loss of office floorspace would be limited to ground or below ground levels, and proposed new uses would be complementary to continued office use on upper floors. Active frontage uses will be required at ground floor levels in most instances.

- ~~refurbishment or re-provision of some or all of the office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; or~~
- ~~the loss of office floorspace the loss of office floorspace is within or near identified residential areas and would result in the provision of additional housing, particularly Build to Rent or Co-living accomodation.~~

~~Where the above criteria have been met, the loss of office floorspace may be permitted provided that:~~

- ~~the proposed development would not compromise the potential for office development on sites within the vicinity and would have demonstrable wider benefits for other objectives of this Plan; and~~
  - ~~the potential for re-providing a reduced amount of office floorspace within the development has been considered.~~
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## Reason for the policy

- 8.1.18. The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the projected increase in employment and office floorspace, it is important to maintain the substantial majority of existing office stock whilst accommodating future demand through the provision of flexible floorspace which that is suitable for a range of occupiers and refurbished office space.
- 8.1.19. The protection and refurbishment of existing offices space is important to ensure that there is sufficient floorspace to meet future demand, and to offer a range of office stock to provide choice in terms of location and cost to potential occupiers. ~~Proposals involving the loss of office accommodation that require planning permission will need to be supported by robust evidence of marketing and viability to ensure that viable offices can be retained to meet future office need.~~ This includes 'best in class', grade A and grade B floorspace. While the current market for grade B space in the City is facing headwinds, with some traditional grade B occupiers shifting to more flexible working patterns or seeking other forms of flexible workspace, it remains uncertain whether this will persist over the longer term. This will be monitored and guidance will be issued if required to provide additional advice on appropriate responses to this potential challenge.
- 8.1.20. Following changes to the Use Classes Order introduced in September 2020, existing offices ~~could~~ can be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.
- 8.1.21. Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy DE1 and the need to find suitable and sustainable uses for historic buildings. ~~Historic buildings can provide affordable office stock though they have specific constraints and opportunities which may affect the viability of refurbishment.~~
- 8.1.22. The City of London Local Plan has for many years sought to protect suitably located and viable office floorspace, with marketing and viability evidence required to support proposals that result in a loss of office floorspace. This approach, supported by policy in the London Plan, has successfully protected the critical mass of office floorspace in the City, helping to maintain its primary office function. This broad approach will be maintained. However, there are instances where conversion of office buildings to other uses may assist in making the retention of existing buildings a more attractive investment opportunity, contributing to the 'retrofit first' approach promoted in this Plan. This approach could also assist in delivering a greater range of facilities and uses in the City, complementing the primary function of the Square Mile while helping to deliver more vibrancy and a focus on increasing visitors. To achieve this, the 'retrofit fast track' approach has been introduced, removing the

requirement for viability justification for a change of use in the circumstances set out in policy. The alternative uses set out – education, culture and hotels – would all help to create a more vibrant Square Mile.

8.1.23. Within and immediately adjacent to identified residential areas, the loss of office floorspace for which there is no ongoing demand may assist in providing housing, to help meet the housing requirement set out in this Plan.

How the policy works

~~8.1.24. Where loss of office is proposed, development will need to meet all the criteria set out in part 1 of the policy, and will need to pursue one of the four routes set out in part 2. This policy will be applied on a sequential basis. Firstly, proposals need to demonstrate that there is no realistic demand for the existing office accommodation, or for refurbished or new office accommodation on the site, by complying with the criteria set out in Part 1 of the policy.~~

~~8.1.25. The loss of office floorspace on the upper levels of buildings will require robust evidence to demonstrate why continued office use is not possible. This includes robust evidence of marketing of the building or site for continued office use. Robust evidence of the marketing of the building or site for continued office use over a period of at least 12 months will need to be demonstrated to comply with part 1 of the policy.~~ The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site over the period. ~~Proposals must provide evidence that the continued office use of the site would be unviable in the longer term.~~

8.1.26. Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances, as set out in Policy PC1. Viability assessments should include the following:

- Site description;
- A valuation of the building in its existing use unfettered by any hope value;
- Total costs of maintaining the building as existing and in the future;
- Costs of refurbishing or redeveloping the building for office use;
- Information on rents and capital values;
- Information on current and recent occupation;
- Target rates of return (internal rate of return or other appropriate measure); and
- Sensitivity testing to support the robustness of the report conclusions.

8.1.27. Where a change in use is proposed from office floorspace to another use, including complementary uses which enhance the attractiveness of the City, or meet other policy priorities set out in this Plan, then the provision of a full



viability assessment may not be required. This would include where complementary uses meet the needs of City workers, residents and visitors and help make City buildings much more open and welcoming to all, or where educational facilities which help attract talented individuals or innovative business to the City are proposed. It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces, and will be exempted from the requirement to provide viability and marketing evidence where it does not prejudice the use of the building or site for office purposes. The priority to reduce carbon emissions and retain embodied carbon set out in Plan also means that changes of use from office to alternative uses which retain embodied carbon may also not require full viability information to justify the loss of office.

~~8.1.28. Within or near identified residential areas, the City Corporation may, in appropriate circumstances, take a more flexible approach to the conversion of office floorspace to residential use, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be more complementary to the business City. In such cases, there would be no requirement to provide marketing and viability evidence under Part 1 of the policy.~~

~~8.1.29. Further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD. Proposals which satisfy Part 1 of the policy will then need to comply with Part 2 of the policy by demonstrating that they are compatible with the wider objectives of the Plan and would not compromise office development on other sites in the vicinity.~~

~~8.1.30. Where a proposal results in a reduced amount of office floorspace, account will be taken of the type and size of office floorspace provided and whether there is a specific need for office floorspace of that size and type in the City.~~

### **Policy OF3: Temporary 'Meanwhile' Uses**

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1. Temporary use of vacant commercial, business and service buildings or sites ('meanwhile' uses) will be permitted encouraged where the proposed use would not result in adverse impacts on the amenity of the surrounding area or the primary business role of the City. Where temporary permission is granted, it will be for a period not exceeding 36 months and the site will revert to its prior lawful use thereafter. Culture and Vibrancy Plans that accompany major developments should explore the potential for meanwhile use.
2. Residential development is not considered an appropriate meanwhile use and will not be permitted.
3. Where a major development would affect existing ground floor or podium level active uses (Class E (a)-(f)), these units should be kept in active use for as long

**as possible prior to development taking place. Culture and Vibrancy Plans should set out how this will be achieved.**

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Reason for the policy

8.1.31. Where buildings or sites in Class E commercial, business or service uses are vacant, and development is not expected in the short term, 'meanwhile' or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained, subject to the impact on surrounding uses.

8.1.32. **Many development sites in the City include shops, restaurants and other active uses within the curtilage. Where leases end prior to redevelopment, these units can remain vacant for long periods, undermining the vibrancy of the area. Meanwhile uses of these spaces prior to redevelopment would help to address this.**

How the policy works

8.1.33. 'Meanwhile' uses will be granted subject to conditions for a maximum of 36 months, after which the use will revert to its prior lawful use. Applications to extend the period of the 'meanwhile' use or make it permanent will be considered against the relevant policies in the Development Plan and will not be permitted unless it is demonstrated that the permanent loss of the prior lawful use is acceptable.

# 9. Retailing

## Context

Retailing is important for all the City's communities—but retail demand is largely driven by City workers. This has resulted in a predominantly five-day (Monday-Friday) trading week with footfall concentrated over weekday rush hours and lunch times. The City is, however, becoming a 7 day a week destination, with more retail units catering for a growing weekend and evening trade.

There is demand for a better range and quality of retail and leisure facilities. The above average spending power of the City's growing working and residential populations, longer and extended working and trading hours, the increasing number of visitors and the Square Mile's high accessibility by public transport create significant opportunities for improvement to the retail offer.

The ways in which people shop and use retail facilities are changing and the City's retail offer needs to adapt to address changing consumer and leisure habits, whilst also retaining a focus on centres as places to shop. The Covid-19 pandemic has significantly reduced footfall in town centres and retail centres nationally and hastened the growth of online retailing, having short-term impacts on the vitality and viability of many retail and leisure facilities. Retail centres that provide a diverse range of town centre uses, including shops, services, creative and leisure activities are likely to be in a better position to respond to changing retail demand and recover from the impacts of Covid-19. In the City, as elsewhere, there has been an expansion of experiential retail, leisure, entertainment and mixed uses, which can increase footfall at different times of the day and add to the visitor experience. Such uses are an important component of the City's overall retail mix.

## 9.1. Retail and active frontages

### **Strategic Policy S5: Retailing and active frontages**

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The City Corporation will seek to **make the City's retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City. The City will work with the BIDs, landowners, operators, and other partners to enrich the 'ground floor economy', encourage active frontages and to provide different offers across different parts of the Square Mile, informed by their character, function and potential.**

The City will seek to improve the quantity and quality of retailing and the retail environment **in the City of London**, promoting the development of the City's four Principal Shopping Centres (PSCs) and the **linkages between them wider distribution of retail** by:

1. Focusing new large-scale retail development in the PSCs and encouraging a vibrant retail offer across the Square Mile movement between them by enhancing the retail environment along Retail Links.
2. Supporting proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand up to 2040~~2036~~.
3. Requiring major retail developments over 2,500m<sup>2</sup> gross floorspace to be located within or near PSCs. Where suitable sites cannot be identified within PSCs, sites immediately adjoining the PSCs and in Retail Links should be considered. Other areas of the City will only be considered where no suitable sites are identified within or adjoining the PSCs~~and in Retail Links~~.
4. Requiring a Retail Impact Assessment for schemes outside PSCs of 2,500m<sup>2</sup> gross floorspace and above. The cumulative impact of retail floorspace will be taken into account in the assessment of planning applications.
5. Focusing comparison and convenience shops within the PSCs, with a broader mix of retail and appropriate town centre uses and other active, publicly accessible frontage uses on the peripheries of the centres~~and the Retail Links~~.
6. Supporting the provision of retail and other town centre uses that provide active and publicly accessible frontages at street level across the City where they would not detract from the viability and vitality of the PSCs~~and the Retail Links~~.
7. Supporting a greater diversity of retail uses in all areas, and encourage contextual approaches for the provision of different types of retail use.
8. Retail and other relevant uses will be encouraged to open at evenings and weekends, particularly in and around areas where there are key attractions.

#### Reason for the policy

- 9.1.1. The City's retail offer has seen significant challenges in recent years as a result of the covid pandemic and changing working patterns, as well as notable retail growth in the Liverpool Street area, bolstered by the opening of the Elizabeth line. Over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors, as well as the Square Mile's high accessibility by public transport, create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.
- 9.1.2. Four Principal Shopping Centres (PSCs) ~~have been~~ are identified which in the City Plan. They provide a variety of comparison and convenience shopping in the City of London: Cheapside, Moorgate/Liverpool Street, Fleet Street and Leadenhall Market. Cheapside is considered to be the City's 'high street' and has seen significant retail development in recent years. Moorgate/Liverpool Street PSC has

potential to accommodate further retail floorspace, capitalising on the opening of the Elizabeth Line and becoming a key retail destination.

- 9.1.3. A Retail Needs Assessment undertaken in ~~2017~~ 2023 identified a need for approximately ~~200,000 m<sup>2</sup>~~ 192,200m<sup>2</sup> of additional retail floorspace up to ~~2036~~ 2040. This is an aspirational target based principally on projected employment and visitor number growth in the City. ~~The reduction in footfall and the increase in online retailing as a result of the Covid-19 pandemic has reduced retail activity in the City, at least in the short term. Although the City experienced a reduction in footfall and reduced retail activity as a result of the Covid-19 pandemic, significant growth is forecast over the life of this Plan.~~
- 9.1.4. The distribution of retail activity throughout the week has also changed, with a shift from a 5 day a week focus around meeting the needs of workers, to more hybrid working and a concentration of worker-based activity in the middle of the week, although this pattern may shift again depending on workplace attendance. Both domestic and international visitor numbers are expected to grow, in part building on the City Corporation's actions to enhance the City as a leisure and cultural destination, and this trend will support further retail demand and growth.
- ~~9.1.5. Alongside changes in patterns of demand, the rise of multi-channel retailing and experiential consumption are changing how stores operate and the nature of the consumer experience, which will impact the type, scale and use of stores. The introduction of a Commercial, Business and Service use class, Class E, which replaces previous A1, A2 and A3 uses, reduces the City Corporation's ability to manage the mix of retail uses. These changes are likely to impact on the projected level of retail growth. Nevertheless, the fundamental economic indicators underpinning the Plan remain. The Assessment identifies the potential for significant retail growth in and around the PSCs, with a focus on potential growth around Moorgate/Liverpool Street. Some growth is anticipated to come forward outside of the PSCs, near them or along Retail Links.~~
- 9.1.6. The PSCs are recognised in the London Plan as 'CAZ Retail Clusters' that accommodate a range of other commercial uses alongside the retail function (see Figure 9). Outside the PSCs, retail units are dispersed across the City ~~though many are on streets identified as Retail Links (see Figure 9), while others form convenient local centres or are isolated units.~~

#### How the policy works

- 9.1.7. In applying this policy and others in this chapter, retail includes shops, cafes and restaurants, and services for use by the general public such as hairdressers, banks and building societies, shoe repair and dry cleaning (ie those uses covered by use class E(a)-(c)). Other uses within Class E, such as gyms and health centres and nurseries (use classes E(d)-(e)) can also be suitable in retail areas, as can a range of other community and cultural uses and those frequented by members of the public, such as pubs and bars. Together this plan refers to all of these uses as active frontages or active

frontage uses, provided the design of the premises creates a frontage that facilitates the visual and physical permeability of the building. For safeguarding, nurseries (use class E(f)) do not usually provide an active frontage but they can be suitable in retail areas as they provide a valuable service and bring vibrancy to an area.

9.1.8. There are further opportunities to develop the City's retail offer, allowing for a broad mix of retail and other suitable facilities while maintaining a predominance of comparison and convenience retail uses. The role and status of the four PSCs will be strengthened, encouraging further retail development, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to pedestrian links and the retail offer within the Retail Links outside of the PSCs, including pedestrian links will encourage visitors and shoppers by to move between the PSCs by enabling increased activity along these connecting routes, and creating a welcoming and vibrant environment.

9.1.9. Major retail development, defined as development over 2,500m<sup>2</sup> gross floorspace, should locate within PSCs, but where suitable sites are not available sites on the edge of the PSCs or identified Retail Links should be considered before other areas of the City. Smaller scale retail development will be encouraged throughout the City, where it provides an active frontage and facilities which meet the needs of the City's working population, visitors or local residents. Particular encouragement will be given to convenience retail uses near to residential areas that serve the needs of residents.

9.1.10. Active retail frontages should be provided at street level across the City. Other appropriate town centre uses, including leisure uses, will be acceptable where they provide an active frontage. Retail uses may be permitted on upper floors of major commercial developments, including in tall buildings, where they provide additional facilities which are accessible to the public and office occupiers.

### **Policy RE1: Principal Shopping Centres**

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9.1.11. Principal Shopping Centres (PSCs) are designated frontages defined on the Policies Map. Sites or buildings that form part of a designated frontage are considered to be part of the PSC in their entirety.

1. The role of the PSCs as concentrations of comparison and convenience shopping will be retained. The loss of existing ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages. Where planning permission is required, proposals for changes between retail uses within the PSCs will be assessed against:

- the contribution the unit makes to the function and character of the PSC;
- maintain an active frontage; and



- the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
- 

#### Reason for the policy

- 9.1.12. ~~The frontages of the four PSCs are defined on the Policies Map.~~ Concentrating major new retail development in or near PSCs will ensure that their vitality and viability is maintained and will provide an opportunity to focus retail facilities in the most appropriate areas of the City, enhancing these as shopping destinations for City residents, workers and visitors. In accordance with the definition of PSCs set out in this policy, a sequential or retail impact assessment will not be required for retail development on any site or building that contains a designated frontage [in a PSC](#).
- 9.1.13. Retail uses within the PSCs are predominantly comparison and convenience uses and the City Corporation considers that this predominance should continue, supported by other town centre uses that provide activity at street level and create a welcoming and attractive environment for people to shop, access services and spend leisure time.
- 9.1.14. Following changes to the Use Classes Order introduced in September 2020, existing shops, premises providing financial and professional services to the public, and restaurants and cafes ~~can~~ [could](#) be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this. Where planning permission is required for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, retail units that are large or in prominent locations should be retained in retail use. The net loss of ground floor retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will be resisted.

#### How the policy works

- 9.1.15. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, whilst retaining a predominance of comparison and convenience shopping uses. Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.
- 9.1.16. Each PSC in the City has an individual character, which is described below, and will be considered in the implementation of policy:

## Cheapside

- 9.1.17. Cheapside has been the City of London's principal marketplace and high street since early medieval times, and the City Corporation will work with partners including the Cheapside BID to reinforce its role and character as the City's high street, maintaining a predominance of comparison goods retail including fashion and clothing outlets.
- 9.1.18. ~~Cheapside PSC is currently the largest PSC in the City and serves a wider catchment area than the other. The PSC includes Bow Lane, the ground floor of One New Change, Cheapside and Poultry. The PSC has undergone significant redevelopment since 2011 and the strategy is to reinforce its role and character as the City's 'High Street', maintaining a clear predominance of retail units with a focus on comparison goods and food and drinks provision. There is scope for greater weekend **and evening** trading and the retail needs assessment shows demand for increased for some additional retail floorspace, particularly to link the western part of Cheapside with Culture Mile. The City Corporation will work with the Cheapside Business Alliance BID to promote the Cheapside area as a shopping, business and visitor destination and to support its evolution into a seven day a week destination.~~
- 9.1.19. Timed restrictions on vehicular access to Bank Junction and the potential for ~~future~~ public realm improvements provide an opportunity to achieve greater pedestrian movement and ~~retail~~ enhance links between Cheapside and retail activity within the Royal Exchange and further east. Public realm improvements at King Edward Street will help to improve links between Cheapside and the Smithfield and Barbican area.
- 9.1.20. The PSC includes Bow Lane, the ground floor of One New Change, Cheapside and Poultry.

## Fleet Street

- 9.1.21. Fleet Street is an important historic thoroughfare, with a rich variety of heritage assets, that acts as the processional route to St Paul's Cathedral. The City Corporation will work with partners including the Fleet Street Quarter BID to revitalise the area, seeking improvements to the public realm and the creation of a more distinctive retail and leisure mix, using heritage assets, meanwhile uses and development opportunities to enliven the area and create more continuous active frontages.
- 9.1.22. Ludgate Hill continues the processional route to the west entrance of the Cathedral, and contains retail that serves visitors and tourists. This City Plan therefore extends the PSC across Ludgate Circus up to St Paul's Churchyard, recognising the important role the area plays in supporting the City's visitor economy.
- 9.1.23. ~~Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers, residents with a limited number of premises open in the evenings or at weekends. The PSC has a linear form and the busy road creates a poor environment and acts as a barrier to pedestrian permeability. Improvements to the~~



~~public realm would help to improve the environment and the visitor and shopper experience. The current retail stock is largely food retail, and there is an opportunity to capitalise on the comparatively lower rents. Fleet Street's outstanding heritage offers opportunities to develop a more distinctive retail mix in this PSC. There is some capacity for additional retail provision between Fleet Street and Holborn and there is scope to strengthen retail links with Cheapside.~~

### **Leadenhall Market**

9.1.24. Leadenhall Market PSC is centred on the iconic Grade II\* listed Victorian market building ~~but~~ and includes several surrounding streets. The PSC is located within the southern part of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The City Corporation will work with the EC BID and other partners to help enliven the area including at weekends and evenings, and seek to transform Leadenhall Market to become a primary destination for visitors, capitalising on its unique heritage and nearby emerging attractions such as public elevated spaces.

9.1.25. Increased demand arising from the expanding City Cluster workforce will be met through the provision of retail units in the surrounding streets. Opportunities will be taken to improve wayfinding in the area and better revealing the presence of Leadenhall Market itself, and the accessibility of the area will be improved. ~~Additional retail will be provided by active retail frontages to new office development in the area.~~

~~The market building is a tourist destination and so evening and week-end trading is encouraged. The character and significance of the historic market will be maintained and enhanced as a visitor and retail destination, supporting a flexible range of retail uses with an emphasis on food and beverage. Increased demand arising from the expanding City Cluster workforce will be met through larger, modern units in the surrounding streets which act as gateways to the market~~

### **Moorgate/Liverpool Street**

9.1.26. Moorgate/Liverpool Street PSC covers a substantial area between and around two major stations. ~~is the second largest in the City but has a relative under-provision of comparison goods space compared to the City average~~ Retail demand in this PSC will continue to increase due to the improved connectivity arising from the Elizabeth line and development in and around Broadgate, supported by further retail provision along routes between Liverpool Street and Moorgate stations. There is potential for the PSC to expand its 7-day a week role, capitalising on its strong transport accessibility, its proximity for inner London residents and to nearby visitor and cultural attractions such as the Culture Mile Barbican, Old Spitalfields Market, Petticoat Lane, and Shoreditch.

### **~~Policy RE2: Retail Links~~**

~~Within the Retail Links, the not loss of active frontages and floorspace will be resisted, including the loss of retail facilities, and additional retail development will be supported. A mix of retail and town centre uses will be encouraged in the~~

~~Retail Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.~~

### ~~Reason for the policy~~

~~Retail Links provide City workers and residents with important services and leisure facilities and are typically along some of the busiest pedestrian routes. Their purpose is to connect the City's PSCs and to provide connections to neighbouring boroughs' retail frontages, transport hubs, areas with high footfall and residential areas. Retail Links are a key part of the 40% of the City's existing retail stock found outside of the PSCs and they play a significant role in meeting demand particularly for day-to-day retail goods and services.~~

### ~~How the policy works~~

~~The Retail Needs Assessment identified the need for approximately 85,000m<sup>2</sup> of additional retail floorspace in the 'rest of the City' outside the PSCs. The Assessment highlighted two areas that should be a priority for new floorspace outside the PSCs: Farringdon/Culture Mile and Eastcheap/Monument. Delivery of new retail floorspace at Eastcheap/Monument could help to meet some of the demand arising from office development in the City Cluster which cannot be accommodated within the Leadenhall Market PSC and would provide more vibrant links towards the Pool of London.~~

~~While the Retail Needs Assessment concluded that the Retail Links continue to play an important role in meeting demand, it advocated a different occupier mix in these areas compared to the PSCs in order to avoid drawing visitors away from the prime PSC streets. Comparison goods shopping should continue to be focused in the PSCs to maintain the health of the City's core retail offer.~~

~~While the mix of uses in the Links should include comparison and convenience shops, a variety of other retail and town centre uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through litter, noise, disturbance and odours. All development in the Retail Links should incorporate active frontages at street level.~~

~~Policy [RE3](#) [RE2](#): Ground floor retail provision Active frontages elsewhere in the City~~

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- ~~1. Retail Active frontage uses will be encouraged at ground floor level across the City provided they:~~
  - ~~● include active frontages onto the street;~~
  - do not impact adversely on the amenity of residents, workers and visitors;
  - do not impact adversely on the operation of office premises; and
  - would not adversely affect the vitality and viability of the PSCs ~~or Retail Links~~.

**2. The loss of existing active frontage uses will be resisted. Development that proposes their loss should be supported by evidence demonstrating that there is no demand for active frontage uses and that premises have been actively marketed for a period of no less than 12 months. Alternative uses that would support the retail environment should be provided.**

3. The loss of convenience retail units **located close to, or** that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required.

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#### Reason for the policy

9.1.27. **Many areas of the City contain retail and other active frontage uses that add vibrancy to the area and provide valuable services and leisure opportunities for workers, residents and visitors. Evidence demonstrates that there is substantial future demand for retail floorspace in the City, driven by increased numbers of workers and visitors to the Square Mile. The loss of retail and other active frontage uses across the City would undermine the ability to meet this demand and create a more vibrant City for everyone.**

9.1.28. Retail units outside of PSCs **and Retail Links** provide local facilities for the City's workforce, enhance the City's vibrancy, and **may** serve the City's residential communities. Given that most of the City's retail provision is tailored towards City workers, it is important to retain units such as convenience stores that are within easy walking distance of the residential areas and meet the day to day needs of surrounding communities. Unless they are subject to specific planning conditions, such units could be converted to any Class E commercial, business and service use without planning permission.

#### How the policy works

~~9.1.29. **The provision of new retail units, particularly comparison and convenience units, at ground floor level in existing and new development will be encouraged where these units do not have an adverse impact on the operation of office premises, provide an active frontage onto the street and do not have an adverse impact on the amenity of residents, workers or visitors by reason of noise, smells or fumes from the operation of the unit or servicing and deliveries. Use of ground floors for retail provides the opportunity to create more permeable buildings which can assist in reducing pressure for space on City streets.**~~

#### **Policy RE4 RE3: Specialist Retail Uses and clusters**

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The City Corporation will seek to retain specialist retail uses and premises that are historically and culturally significant to the City of London.

**Existing and potential clusters of retail uses that contribute to the character and vibrancy of particular areas will be supported. Development in these areas should enhance and support retail uses in the area and deliver active frontages.**

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## Reason for the policy

9.1.30. Within the City, there are some specialist retail uses and premises that cannot be found elsewhere, such as the historic Royal Exchange and the London Silver Vaults on Chancery Lane. These uses contribute to the City's visitor economy and to its cultural distinctiveness and should be retained and promoted.

9.1.31. The City also has number of retail clusters outside the PSCs that play an important role in bringing vibrancy to an area or that are an inherent part of the area's character. This includes:

- Premises around Smithfield market, which is going to see substantial change as the new Museum of London relocates to this area.
- The courts and alleys around Cornhill, which require careful steps to ensure they remain (and in some cases become more) vibrant as well as improvements to wayfinding.
- Areas around Middlesex Street and Aldgate High Street, which serve residential communities as well as visitors and local workers. Partnership working with the Aldgate Connect BID and London Borough of Tower Hamlets will be important across the wider area. Additional convenience retail in this area will be supported.
- Areas around Minories, where there is a number of hotels alongside residential communities and emerging student housing. Additional convenience retail in this area will be supported.
- Retail around the Golden Lane and Barbican estates, which play a role in serving the residential communities.
- The south side of Holborn around Chancery Lane tube, which contributes to the wider 'central London frontage' that Camden identify in their Local Plan.
- Many of the the City's main thoroughfares and areas around transport hubs include retail uses.

9.1.32. There is potential for areas along the Thames riverfront to enhance the retail and leisure offer, where this would contribute to the creation of a vibrant, inclusive and welcoming riverfront for all.

The Thames riverfront, particularly emanating from Millenium Bridge but in principle along the full length, where there are opportunities to improve the vibrancy of the riverside over the medium and longer term.

## How the policy works

9.1.33. The City Corporation will work with owners, developers and occupiers to retain specialist retail uses and premises where it can be demonstrated that such uses are of historical or cultural significance. The City Corporation may attach conditions to planning permissions to ensure the retention or replacement of specialist facilities on the same site where they are impacted by development proposals.

#### **Policy [RE5](#) [RE4](#): Markets**

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Proposals for markets and temporary retail pop-ups will be encouraged where they:

1. are of an appropriate scale and frequency for their location;
  2. would ~~not have a significant adverse impact on~~ [enhance](#) the vitality and viability of existing retail centres within or outside the City;
  3. would not have a significant adverse impact on the amenity of nearby residents or business occupiers;
  4. would not unduly obstruct pedestrian and vehicular movement; and
  5. would not involve the permanent loss of open space or harm the character of that space.
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#### Reason for the policy

9.1.34. There is an increasing demand for temporary retail pop-ups and street food markets, [such as the Guildhall Yard Lunch Market](#), which can support the local economy by generating increased vibrancy, retail diversity and footfall. These uses provide greater retail choice, enliven the public realm and increase the attractiveness of the City as a place to live, work and visit. Pop-up and meanwhile uses can minimise vacancies of retail premises while a long-term occupier is sought and may be used to animate areas where construction works are taking place.

9.1.35. Street trading in the City is regulated by the City Corporation under the City of London Various Powers Act 1987 (as amended), which restricts permanent street trading but allows street trading to take place for temporary periods in specified locations. The exception is on Middlesex Street (Petticoat Lane) Market, which straddles the boundary between the City and Tower Hamlets, where licensed trading is permitted between 9am and 2pm on Sundays. Further information on licensing requirements is set out in the City Corporation's Street Trading Policy which is available on the Corporation's website.

9.1.36. Temporary street trading, where permitted under the Various Powers Act, can operate for up to 14 days in a calendar year under permitted development rights. Trading for longer periods will require planning permission. Market trading off City streets but within the curtilage of a building will similarly require planning permission if undertaken for a period of more than 14 days in a calendar year.

#### How the policy works

9.1.37. Proposals for markets or temporary retail pop-ups located within a building or its curtilage should be ancillary to and complement the main use of the site. When assessing proposals for new permanent markets and opportunities for pop-ups, the City Corporation will consider the potential for significant adverse impacts on the trade of retailers occupying fixed units within the vicinity, together with impacts on the amenity of nearby residents or business occupiers, on pedestrian and vehicular movement or on open spaces.

DRAFT

# 10. Culture and Visitors ~~and the~~ ~~Night-Time Economy~~

## Context

London has long been recognised as one of the world's great cultural cities. The City of London contains a huge concentration of arts and cultural facilities, which contribute to its uniqueness and complement its primary business function. These facilities include galleries, theatres, museums, heritage attractions, Livery Halls, libraries, places of worship and concert halls. In recent years a growing number of night-time entertainment facilities such as clubs, bars and event venues have located in the City, alongside the traditional historic public houses. Research undertaken for the City Corporation shows that growth in creative industries in the City between 2010 and 2016 has outpaced growth elsewhere in London and the UK.

The City's cultural offer is an integral element of the Square Mile, alongside the business City. The Barbican is identified as a strategic night-time location of national or international significance while Cheapside and Liverpool Street are identified as night-time areas of more than local significance in the London Plan. The City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section.

The City Corporation has prepared Visitor and Cultural Strategies that promote the City as a high-quality visitor destination with an emphasis on world-class cultural facilities. It is estimated there are approximately 21.5 million business and leisure visits a year to the City and this is expected to grow as a result of an increased cultural offer and improvements to transport accessibility such as the Elizabeth Line and Bank Station upgrade. Suitable facilities and hotel accommodation are required to provide visitors with a pleasant experience whilst in the City.

Cultural and creative activity can contribute significantly to the quality of the environment and cultural experience, particularly where it enhances a sense of place. Public art can give visual pleasure and help to re-establish local identity and sense of place.

## 10.1. Culture and Visitors

### Strategic Policy S6: Culture and Visitors ~~and the Night-Time Economy~~

The City Corporation will maintain and enhance the City of London's cultural, leisure and recreation offer, visitor experiences and infrastructure, and the City's evening and weekend economies to position the Square Mile as a key cultural and leisure destination, by: unique identity, character, and attractiveness to continue being a world-leading cultural and leisure destination within London and contribute to the wider objectives of the Destination City



programme by contribution to London's world-class cultural offer and the City's communities will be able to access a range of arts, heritage and cultural experiences by:

1. Encouraging cultural placemaking and creating vibrant and inclusive places that contribute to the experience of living, working and visiting the City while addressing the needs and aspirations of the City's communities.
2. ~~Providing, supporting, encouraging access to and further~~ Developing a wide range of creative and cultural, leisure and recreation facilities across the City that offer unique experiences at different times of the day and week, in line with the Culture Planning Framework (CPF), and that support City's role as a visitor destination. ~~and delivering a major destination for culture and creativity in the north west of the City through the Culture Mile initiative;~~
3. ~~Requiring developers to submit Cultural Plans for major development, outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer;~~
4. Protecting and enhancing existing areas of cultural significance including cultural buildings and leisure and recreation facilities, particularly where they provide an anchor for cultural regeneration or where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City;
5. Providing accessible and inclusive infrastructure and facilities that complement cultural, leisure and recreation uses in the City;
6. Placing heritage at the heart of cultural placemaking, seeking opportunities to embed heritage in the cultural offer and creating spaces and experiences that celebrate the City's rich history, culture and community;
7. Supporting the development of creative industries enterprise through and encouraging appropriate workspace and digital infrastructure to facilitate their development, particularly within Culture Mile;
8. Allowing hotel development where it supports the primary business or cultural role of the City, ~~and refusing new hotels where they would compromise the City's business function or the potential for future business growth;~~
9. Enabling a vibrant evening and night-time economy, especially in areas of night-time activity and around cultural and tourist attractions where public transport such as the night tube and night buses are available, ensuring that night-time users are well-served with safe and convenient night-time transport; while ensuring that operators proactively manage night-time entertainment premises to minimise potential impact to residents and workers;
10. Maintaining the City's existing ~~collection of public art artworks, statues, memorials and~~ culturally significant objects items and pursuing opportunities to commission new, high quality artworks pieces in appropriate locations, ensuring they protect and enhance the local character, are accessibly and inclusively designed, and contribute towards enriching the public realm; and
11. Maintaining and enhancing the City's open spaces and/or streetscape public realm to accommodate cultural events and activities that are inclusive and



accessible to all City communities, and which promote and celebrate ~~the City's~~ unique-rich heritage and culture offer; and

## 12. Encouraging the temporary use of vacant buildings for creative and cultural activities.

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### Reason for the policy

- 10.1.1. London has long been recognised as one of the world's great cultural cities. The definition of culture in the context of the City is broad and inclusive; culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. The City's night-time entertainment facilities – such as clubs, bars and event venues alongside traditional historic public houses – play a crucial role as cultural contributors. They enhance the City's leisure, recreation and cultural offer, providing people with a wholesome experience and a sense of belonging. Community facilities, open spaces, places of worship, and heritage also provide important physical settings for a wide range of cultural, leisure and recreation activities that can attract more visitors.
- 10.1.2. ~~The City Corporation's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. Culture is seen as being for everyone and is a driver of social mobility. The City's cultural offer forms an integral part of the Square Mile, alongside its financial and business role. Barbican is identified as a strategic night-time location of national or international significance in the London Plan while Cheapside and Liverpool Street are identified as night-time areas of more than local significance in the London Plan. The London Museum with its new home in Smithfield's iconic market buildings will act as a cultural anchor in one of the most historic areas of the Square Mile.~~

- 10.1.3. Destination City, the City Corporation's flagship strategy, seeks to ensure that the City is a global destination for workers, visitors and residents. It aims at enhancing the Square Mile's leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. The international reputation and high quality of this cultural activity has a critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business. It attracts an increasing number of visitors, with consequent economic benefits, and supports the health mental, spiritual and physical wellbeing of the City workers, residents and visitors and workers.

#### How the policy works

- 10.1.4. The City Corporation will require proposals for new development and changes of use to protect existing leisure, arts and cultural facilities where they are needed and where necessary require appropriate replacement. The City Corporation will work with developers and cultural and arts institutions to deliver new facilities and spaces where they ~~support the Culture Mile ambition or~~ enhance the attractiveness of the City as a business and cultural and leisure destination.
- 10.1.5. ~~Developers will be required to submit Cultural Plans as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's creative and cultural offer for eple by incorporating cultural activites or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.~~
- 10.1.6. The City Corporation's Cultural Planning Framework identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise.

#### **Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities**

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1. The City Corporation will resist the loss of existing visitor, arts, and cultural facilities, unless:
  - replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities; or

- the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
  - it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, arts or cultural use at reasonable terms for such a use.
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#### Reason for the policy

10.1.7. The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition for buildings and sites from commercial uses in the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed before a site will be allowed to change use.

10.1.8. There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches, and specialist retail premises such as the Silver Vaults in Chancery Lane.

10.1.9. ~~Some cultural facilities fall within broad categories of land use under the Use Classes Order, enabling the change of use of any one land use to another within that class without requiring planning permission. For instance, museums, places of worship and exhibition halls all fall within Use Class F.1 (Learning and non-residential institutions). However, other uses such as theatres, concert halls and public houses are classed as sui generis, meaning that planning permission would be required to change them to any alternative use.~~

#### How the policy works

10.1.10. Applicants will be required to demonstrate that an existing visitor, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use). Marketing will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.

10.1.11. The City Corporation has published guidelines for determining nominations for Assets of Community Value (ACV) in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest. In determining whether a public house has heritage, cultural, economic or social value, the City Corporation will have regard to those guidelines as well as the characteristics outlined in the London Plan.

### **Policy CV2: Provision of Arts, Culture and Leisure Facilities**

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**The City Corporation will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City by:**

- 1. Requiring major developments to submit Culture and Vibrancy Plans setting out how their development will culturally enrich the Square Mile, informed by the City Corporation's Cultural Planning Framework;**
  - 2. Requiring large scale development proposals of 10,000 sqm or more in size to make provision on-site for arts, culture or leisure facilities;**
  - 3. Requiring major developments below 10,000 sqm in size to make provision for arts, culture or leisure facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards arts, culture and leisure facilities and infrastructure. On-site provision will be preferred, with off-site provision only being appropriate where a specific project has been identified through partnership working.**
  - 4. Encouraging the provision of arts, culture and leisure facilities in historic buildings and spaces where this would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming and accessible for all.**
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### **Reason for the policy**

10.1.12. **The provision of new arts, culture and leisure facilities in the Square Mile is a key mechanism to help realise the City Corporation's Destination City vision. These facilities will not only help to ensure the City becomes a key leisure destination for visitors but also maintains and enhances its position as a global business centre, as well as providing exciting and enriching cultural and leisure experiences for people living and working in and around the Square Mile. To achieve this, it is crucial that major developments contribute towards delivering new cultural and leisure facilities that help enhance the appeal and character of the development and the focal area in which they are located.**

A review of the Cultural Plans submitted with planning applications show that many major developments already make a significant on-site contribution to the creation of new cultural spaces. Large developments have the greatest flexibility to provide facilities on-site, although many smaller major developments will also be able to accommodate cultural facilities, or to contribute to schemes in the area.

### How the policy works

- 10.1.13. Major developments will be required to submit Culture and Vibrancy Plans. These Plans should describe the cultural proposal, including the type and scale of arts, culture or leisure offer, and how it would complement the character of the focal area identified in the Cultural Planning Framework.
- 10.1.14. Arts, culture and leisure facilities covers a wide range of uses, including museums, art galleries, libraries and performance venues; community uses that can be used and programmed creatively; integrating cultural activities into new public spaces, including roof gardens and viewing galleries; creating active street-level spaces; revealing spaces within heritage buildings to the public; creating a heritage-led cultural offer; providing affordable space for creative enterprises; encouraging meanwhile uses; providing inclusive and accessible sport and recreation facilities; and incorporating public art in the building's design or within public realm.
- 10.1.15. Developers should consider the operational and management requirements of cultural and leisure facilities provided in new developments prior to approval. A robust management plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage.
- 10.1.16. In some instances, financial contributions can be pooled together to deliver larger projects creating a more significant impact. Where two or more developments are in close proximity to each other, it may be acceptable to pool contributions to provide a larger cultural offer which will have a greater value.

### **Policy CV2-CV3: Provision of Visitor Facilities**

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The provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm will be encouraged, including:

1. Seating and tables;
2. structures and landscaping to enable children's play and provide facilities for school groups;
3. suitable shelter from weather conditions;

4. well-designed public convenience provision, including changing places toilets, accessible to all users;
  5. well-designed signage, wayfinding and links to visitor facilities and destinations;
  6. temporary pop-up art installations, galleries and spaces in appropriate locations;
  7. performance spaces and animation of key routes where appropriate.
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#### Reason for the policy

10.1.17. The City attracts large numbers of tourists in certain locations such as around St. Paul's Cathedral and near the Tower of London. This is expected to grow with new attractions ~~such as the proposed~~ **including the** relocated Museum of London in Smithfield attracting increased numbers of visitors. It is important that the City of London can offer a range of facilities and events which meet the needs of these visitors whilst creating a distinctive look and feel for the City.

#### How the policy works

10.1.18. The City Corporation will work with developers and arts and culture institutions to ensure that new developments and open spaces near tourist attractions provide facilities that improve the experience for visitors and cater for how visitors use the space. These facilities must be capable of being accommodated without detracting from the setting of the relevant tourist attraction, the wider townscape or residential amenity.

#### **Policy CV34: Hotels**

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Proposals for hotels and other visitor accommodation will be permitted where they:

1. ~~do not result in the loss of viable office accommodation for which there is continuing need, as set out in~~ **comply with the requirements of** Policy OF2;
2. do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
3. **provide active frontages and active uses at ground floor level,** including a ~~range of complementary~~ facilities accessible to the public;
4. **are in suitable locations that provide good access to attractions, workplaces and other destinations in and outside the City, including via public transport;**
5. provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage, and taxis, appropriate to the size and nature of the development;
6. are inclusive, meeting London Plan accessibility standards for new hotel bedrooms;
7. ensure continuing beneficial use for historic buildings, including enhanced **and inclusive** public access to and interpretation of that heritage, where appropriate; and



8. address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).
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#### Reason for the policy

- 10.1.19. While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in ~~2020~~ **2022** had ~~44~~ **43** hotels, **apart-hotels** and hostels, providing ~~over 6,700~~ **7,552** bedrooms **and a further 33 serviced apartment properties providing 1,551 units**. ~~The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 204. This demand is driven by a projected increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City's projected share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement.~~ **A hotel needs study for the City was carried out in 2022, which assessed the overall need for hotel bedrooms to be 4,012 by 2037. This consists of the forecast pipeline of hotel rooms up to 2030, with additional projected demand of an average of 350 rooms per year beyond that point.** ~~It should be noted that these GLA forecasts predate the Covid-19 pandemic but although there have been short term impacts on the tourism industry, the attractions of the City and of London as a visitor destination remain strong.~~
- 10.1.20. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for business accommodation is likely to increase. Visitor numbers are projected to increase, and the development of ~~Culture Mile~~ **the City Corporation's ambition to establish the City as a cultural destination** is likely to increase demand for hotel accommodation, particularly in the north west of the City.

#### How the policy works

- 10.1.21. Policy CV3 applies to hotels, apart-hotels and serviced apartments.
- 10.1.22. Hotel development should ~~not prejudice~~ **complement** the primary business function of the City. ~~Proposals by displacing sites that are suitable for office accommodation. Hotel proposals will need to demonstrate that there would not be a loss of suitable and viable office floorspace~~ **they are** in accordance with Policy OF2 and the Office Use SPD.
- 10.1.23. Hotel development may be suited to listed buildings, providing an alternative use which could enable significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved **inclusive** public access to and interpretation of the building's heritage.
- 10.1.24. Hotels can cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location



of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers.

10.1.25. Where new hotels are considered to be acceptable, they should **facilitate the creation of active frontages and an inclusive City by providing** ~~enable the~~ public ~~to~~ access **to inclusive** facilities such as co-working space, meeting rooms, **cafes**, restaurants or leisure facilities **or other spaces**, in order to bring the maximum benefit to the City's communities. **Hotel lobbies that have a significant ground floor presence should be designed as inclusive, welcoming spaces that members of the public who are not staying at the hotel feel welcome to enter and spend time in. Large-scale hotel development may also be suitable locations to provide public toilet facilities and provide 'cool spaces' that provide temporary respite during heat waves.**

10.1.26. Apart-hotels and serviced accommodation often display characteristics more associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use Classes, depending on their characteristics. Factors that may affect the Use Class include;

- Presence of on-site staff/management;
- Presence of reception, bar or restaurant;
- Provision of cleaning and administrative services;
- Ownership of units/ability to sell on open market; and
- Minimum/maximum lease lengths.

10.1.27. Where apart-hotels and serviced apartments are considered to fall within the C3 (dwelling houses) Use Class, proposals will be assessed in accordance with the housing policies in this Plan, including the requirement for affordable housing **policies**. Conditions will be used to ensure units are subject to minimum lease lengths.

10.1.28. For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and may prejudice the business City and put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

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## **Policy CV5: Evening and Night-Time Economy**

1. Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- the amenity of residents and other noise-sensitive uses;

- environmental amenity, taking account of the potential for noise, disturbance, waste and odours arising from the operation of the premises, customers arriving at and leaving the premises, and the servicing of the premises.
2. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises and are **encouraged to should** engage with nearby residential and commercial occupiers.
  3. Where new residential development is proposed close to existing evening or night-time uses, the residential development will only be permitted if it includes suitable measures to mitigate potential disturbance and noise and air quality issues for prospective residents, **in line with the agent of change principle.**

#### Reason for policy

- 10.1.29. Evening and night-time entertainment is becoming an important part of the City's economy, bolstered by London's move toward becoming a 24-hour destination, growing numbers of workers and visitors, and the encouragement of arts and culture in the City. Expansion of the City's evening and night-time offer will be encouraged where it is compatible with neighbouring uses. Night-time entertainment has the potential to **add vibrancy to the Square Mile but can** cause noise disturbance to nearby residents as well as other impacts such as anti-social behaviour, litter and odours. These adverse impacts need to be mitigated.
- 10.1.30. Anti-social behaviour can potentially be reduced by providing a broad range of evening and night-time activities that appeal to different customers, rather than concentrating one type of use in a particular area. This includes extending the opening hours of existing day-time facilities such as shops, cafes and leisure facilities, which can promote customer cross-over and create bridges between the day-time and night-time economy.

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#### How the policy works

- 10.1.31. The City Corporation will require the development responsible for change to manage the impact of that change – the 'Agent of Change' principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.
- 10.1.32. Night-time entertainment uses in the City include restaurants and cafes, drinking establishments, hot food takeaways, **nightclubs** and other related uses **including, for example, a nightclub or a mix of such uses.** They form part of the City's wider night-time economy.
- 10.1.33. The management of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In

general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance. ~~Changes to the Use Classes Order in 2020 allow flexibility for commercial premises including offices and shops to become restaurants and cafes without requiring planning permission. Licensing and environmental health legislation would need to be applied to address any potential nuisance to nearby occupiers in these circumstances, albeit that planning permission would be required for any physical works such as ventilation equipment associated with a restaurant or café use.~~

- 10.1.34. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment. This is supported by the City Corporation's Code of Good Practice for Licensed Premises. The City Corporation's Noise Strategy sets the strategic direction for noise policy within the City of London and outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.
- 10.1.35. The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in disturbance and nuisance from excessive noise, particularly from people drinking and smoking outside, and arriving or leaving. Policy SA2 (Dispersal Routes) requires applications for night-time uses to include Management Statements setting out proposals for the dispersal of patrons.
- 10.1.36. All planning applications for restaurants and cafes, where planning permission is required, and for drinking establishments, hot food takeaways and related, uses should include information stating the proposed hours of operation. The City Corporation may impose conditions requiring the closure of the premises between the hours of 11pm and 7am where appropriate, such as near noise sensitive uses.
- 10.1.37. Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are expected to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. ~~Policies HL3 and HS3 deal with noise and light pollution, and the residential environment respectively.~~
- 10.1.38. Proposals for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that

addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:

- hours of closure to protect amenity;
- noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as soundproofing, noise controls and double entry lobbies;
- the dispersal of patrons so as not to cause disturbance to residents;
- arrangements for the storage, handling and disposal of waste;
- a timed programme for deliveries and collections and other servicing arrangements;
- measures to deal with the emission of odours; and
- location of ventilation ducts and plant.

10.1.39. Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule. It is recognised that it may not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers are known.

10.1.40. To safeguard quiet times and amenity, particularly for residents and other noise-sensitive uses, the City Corporation will attach planning conditions or seek s106 planning obligations to ensure compliance with agreed Management Statements. The City Corporation will normally apply conditions to limit the hours of operation where there is potential for unacceptable disturbance to local residents and others. Each case will be considered in relation to its locality and the need to strike a balance between the benefits to the City of night-time entertainment and the risk of disturbance to local residents, workers and others.

## **Policy [CV5](#)–[CV6](#): Public Art**

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1. The City's public realm and distinctive identity will be enhanced by:

- encouraging the provision of new [permanent, temporary, inclusive, diverse and high quality](#) artworks in appropriate locations in the City on public and private land;
- protecting existing works of art, [statues, memorials](#) and other objects of cultural significance;

- ensuring that financial provision is made for the [continuing future](#) maintenance of new public art;
  - requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.
2. The location of new and relocated artworks must take into consideration the health and safety of pedestrians, particularly [those with disabilities](#) [disabled people](#), and other road users.

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### Reason for the policy

- 10.1.41. Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place and local identity and is a form of community infrastructure. Public art includes temporary installations and non-physical works such as soundscapes.
- 10.1.42. Where appropriate, artworks can be multi-functional so that a variety of community needs can be met. Artworks may provide shelter from the weather, include sensory elements and provide play opportunities.
- 10.1.43. There are several arts events held regularly in the City including Sculpture in the City which forms a free public trail of works of art throughout the City.
- 10.1.44. The proposed public art must respect, and not detract from, the surrounding environment. Objects of cultural significance may include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.
- 10.1.45. Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided, and consideration given to ensuring that people with visual or mobility impairments are not placed in danger. Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers.

### How the policy works

- 10.1.46. The City Arts Initiative (CAI) group advises the City Corporation on the artistic merit, siting, setting and appropriateness of public art proposals in the City. Temporary works of art (in situ for less than 8 weeks), which do not require planning permission, will be considered by the CAI group.
- 10.1.47. Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design of development and applicants should work with artists at an early stage of design. [Artworks and memorials should be appropriate to their location, including the history and context and the use of a site.](#) Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal

agreement. Where works of art are on private land, it is expected that those pieces will be maintained to a high standard by the landowner. The City Corporation may seek contributions through s106 obligations towards the provision of new public art and the future maintenance of public art.

DRAFT



# 11. Infrastructure

## 11.1. Smart Infrastructure and Utilities

### Context

The City of London relies on a range of utilities to function as a global financial, business and cultural centre and to meet the needs of its businesses, workers and residents. There are challenges to providing the infrastructure required to support existing activity in the City and to provide the infrastructure necessary to deliver the level of growth envisaged in the period up to 2036. At the same time, new developments and existing occupiers can actively minimise their demands on infrastructure, utilities and services to ensure that the City can become a more sustainable place to work, live and visit.

Utilities infrastructure comprises the provision of electricity, gas, water, sewerage, sustainable drainage (SuDS), telecommunications, including wired and wireless infrastructure, decentralised energy networks and the pipe subway networks that accommodate such infrastructure.

### Strategic Policy S7: Smart Infrastructure and Utilities

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1. To coordinate and facilitate infrastructure planning and delivery **and the transition towards a zero carbon and climate resilient City**, all development should:
    - Minimise the demand for power, water and utility services;
    - Incorporate sustainable building design and demand management measures;
    - Connect to existing pipe subways where feasible, particularly where there is pipe and cable congestion under the streets;
    - Seek to provide the latest and best quality utility infrastructure and connections to serve the development.
  2. Developers must engage with infrastructure providers at an early stage of design to ensure that the infrastructure needs arising from the construction and operation of new development are addressed and required utility networks and connections are in place in time to serve the development.
  3. Existing essential utilities and telecommunications infrastructure will be protected from development unless it is no longer required or will be adequately relocated.
  4. The improvement and extension of utilities infrastructure should be designed and sited to minimise adverse impacts on the visual amenity, character and appearance of the City and its heritage assets.
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## Reason for the policy

11.1.1. Infrastructure is a vital component of modern cities. Maintaining high quality and sustainable utilities provision in the Square Mile is crucial for the City to remain competitive and address climate challenges.

11.1.2. There are specific challenges to providing the infrastructure needed to support existing activity in the City and the ~~additional infrastructure necessary to support the scale of~~ development set out in this Plan:

- The dense concentration of business activity in the City means that high demand is concentrated in a small geographical area.
- There is a legacy of congested cable routes under the City's streets.
- Delivery of new infrastructure and improvements to existing networks may result in temporary disruption to businesses, residents and visitors.
- Energy and telecoms demands are increasing and there is a need to continually improve and upgrade networks to meet this changing demand in a sustainable way, which does not compromise the City's trajectory towards zero carbon.

## How the policy works

11.1.3. The City Corporation has established strong links with the various infrastructure providers that service the City, including Thames Water, UK Power Networks, Cadent Gas, Citigen and telecoms providers. The City Corporation will seek to retain and strengthen these links, working with all providers and regulators, where appropriate. The City Corporation are developing a Utility Infrastructure Strategy, which sets out the steps that will be taken, including through partnership working, to ensure the City's utilities infrastructure remains fit for purpose and future proofed.

11.1.4. Developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.

11.1.5. Utilities infrastructure comprises the provision of electricity, gas, water, sewerage, sustainable drainage (SuDS), telecommunications, including wired and wireless infrastructure, decentralised energy networks and the pipe subway networks that accommodate such infrastructure.

## **Policy IN1: Infrastructure provision and connection**

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1. Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for:

- Electricity, gas and water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise

future demands. Temporary building supply for the construction phase should be identified in conjunction with electricity providers including the estimated load capacity, substations and route for supply;

- Heating and cooling demand and viability of provision ~~via decentralised energy networks~~. Designs ~~must~~ **should** incorporate connections to existing decentralised energy networks where feasible;
- Digital and telecommunications network demand, including full fibre wired and wireless infrastructure in line with the Mayor of London's 'Wired Score' connectivity rating or equivalent, planning for dual entry through communal entry chambers and flexibility to address future technological improvements;
- Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

**Where it is not possible to provide detail at application stage, planning conditions and/or obligations will be used to secure the provision of such detail.**

2. To avoid delays to prospective tenants, developers should consider pre-installing ~~fibre optic and other~~ **telco communal chambers or other innovative solutions to help facilitate** communications networks, into the new development.
  3. Developers should conduct mobile signal tests within the development and consider the need for **provider neutral** in-building mobile solutions where coverage is poor.
  4. Development should aim to avoid reducing mobile connectivity in surrounding areas, and if that is not possible suitable mitigation measures will be required. Provision should be made on buildings or in the public realm to accommodate well-designed and located mobile digital infrastructure.
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**Reason for the policy**

- 11.1.6. The dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and district heating and cooling networks are of particular importance. Congested cable routes traverse the City under its streets. Energy demands are increasing, particularly to provide air conditioning to counter increased warming and the delivery of upgraded ICT networks required by financial and business services. The impact of Covid-19 has highlighted the importance of digital connectivity. ~~Recovery from the pandemic offers an opportunity to speed up~~ **and** the transition to **a an increasingly digital-reliant** economy, ~~accelerating the adoption of remote and home working, e-learning, e-commerce and telemedicine.~~
- 11.1.7. The City Corporation's ~~Infrastructure Delivery Plan~~ **Utilities Infrastructure Strategy** sets out in more detail the infrastructure projects that are under construction or required.

## How this policy works

- 11.1.8. Developers must liaise with utility providers and adopt best practice in assessing and improving connectivity within developments. Connection layouts and future proofing should be considered in the design of the development.
- 11.1.9. Addressing air pollution is a fundamental concern for the City Corporation. Developers **must should** engage with energy providers prior to commencement of development works to ensure the availability of temporary building supplies, avoiding the need for diesel generators to provide electricity.
- 11.1.10. Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors. Developers must co-operate with infrastructure providers to minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction.
- 11.1.11. It is essential for the City to be digitally connected and responsive to the changing requirements of business, equipping businesses to benefit from the digital transformation stimulated by the Covid-19 pandemic. Buildings must be equipped to meet the digital needs of current and future occupiers. Developers will be expected to undertake an assessment of the connectivity of major new office buildings or refurbishments, using a wired certification such as WiredScore. Development should result in an improvement in the City's digital connectivity.
- 11.1.12. Mobile connectivity within and around buildings is critical to the City of London. Developers will need to ensure that their buildings do not worsen existing signal strength in the area and consider the provision of in-building solutions where signal strength is poor. The roll out of 5G across the City will require additional mobile infrastructure and suitably located cells. Where feasible, provision for new cells should be incorporated into new development. Where this is not feasible, provision should be made for additional cells to be located in the public realm, on existing street furniture or elsewhere as appropriate.
- 11.1.13. The City Corporation will encourage the improvement and extension of utilities networks to ensure that the City uses the latest technology and continues to provide good quality services for businesses, residents, students and visitors. The City Corporation's City Developer Guidelines for Incoming Utility Services provides guidance on best practice.

## **Policy IN2: Infrastructure Capacity**

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1. Development must not lead to capacity or reliability issues in the surrounding area and capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.
2. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to

facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

3. Developers are required to demonstrate, through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation.

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### Reason for the policy

- 11.1.14. Early engagement with infrastructure providers is essential to ensure that there is adequate capacity to serve the development during its construction and operational phases.

### How this policy works

- 11.1.15. The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and should include evidence of engagement with providers.
- 11.1.16. Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote and contribute towards a zero low-carbon based economy, through smart buildings and incorporating alternative solutions into the design. It will be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure, which may involve studies being undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.
- 11.1.17. Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in underutilisation of infrastructure. The cumulative impacts should be considered through discussion with providers and pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.
- 11.1.18. Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.
- 11.1.19. Redundant plant should be removed where possible to facilitate future infrastructure connections. Redundant infrastructure within the public realm, such as telephone boxes, should be removed unless it is of heritage interest.

## **Policy IN3: Pipe Subways**

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Developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes where these are available. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

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### Reason for the policy

11.1.20. Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways would provide greater capacity for pipes and cables, reducing the need for street works which often cause disruption. Pipe subways accommodate gas and watermains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then not easily accessible.

### How the policy works

11.1.21. The City Corporation will seek the expansion and integration of development into the pipe subway network where there is sufficient evidence to demonstrate that services to development would be better integrated within an established pipe subway. Given the cost of installing new pipe subways, it is especially important to make efficient use of the existing network. Developments which are located adjacent to existing pipe subways will normally be expected to install connections.

# 12. Design Shape Outstanding Environments

## 12.1. Design

### Context

The built environment of the City of London has a unique and distinctive character. Arranged on a predominantly medieval and Roman street pattern, high quality historic and modern buildings and urban green spaces create a rich visual landscape of building types, materials and architectural design. The City of London has a nationally and internationally renowned townscape. The City has been a centre for international trade for centuries and this long history of commercial activity and its modern role as a world-leading financial and professional services centre is reflected in the design of the buildings and their activities.

The demand for additional office floorspace and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape which presents challenges and opportunities to ensure that new development delivers good growth. Innovative and creative solutions are required to optimise the use of land as a scarce resource, while creating architecture of a world class standard which enhances the City's rich character.

To realise the City Corporation's vision for the Square Mile, the design of the built environment should contribute towards the delivery of a competitive and creative City with exemplars of sustainable building design. Development should contribute towards the aim of achieving a zero emission and climate resilient City by 2040 in accordance with the City Corporation's Climate Action Strategy.

### **Strategic Policy S8: Design**

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The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces. Design solutions should make effective use of limited land and contribute towards **vibrancy, inclusion**, wellbeing and a greener, **net zero emission-carbon** City, through development **which that:**

#### **Sustainable design**

- 1. Takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options;**
- 2. Seeks opportunities to refurbish existing buildings, improving their environmental performance;**
- 3. Minimises whole life-cycle carbon and contributes towards a net zero carbon City; and**

4. Delivers world class sustainable buildings that are adaptable and informed by circular economy principles and that treat materials as a resource;
5. Embeds climate resilience into design and contributes to the resilience of the Square Mile;
6. Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial carbon emissions.

### Form and Layout

1. Optimises site capacity, informed by the character of the area and its potential for growth;
2. Delivers buildings and spaces that have the right scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study;
3. Optimises pedestrian movement by maximising permeability, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
4. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;
5. ~~Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter roof terraces and spaces, including in tall buildings and along the river and around City landmarks~~
6. ~~Delivers world class sustainable buildings which are mixed-use, adaptable, adopt circular economy principles and contribute towards a zero-emission, zero-carbon and climate-resilient City;~~

### Experience

7. Provides an appropriate mix of uses that contribute to the creation of a vibrant City;
8. Places people at the heart of design, creating buildings and spaces with a strong sense of belonging;
9. Optimises microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views;



10. Delivers street level building frontages which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
11. Optimises the amount and connectivity of green infrastructure ~~and~~, biodiversity and public amenity space and urban greening, and provides these in ways that are integral to the architecture and site design, ~~enhancing public access to nature and biodiversity through maximising the provision of green roofs, walls and trees;~~ and
12. Delivers inclusive buildings, streets and spaces that meet the access needs of all the City's communities irrespective of background or circumstance;
13. Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter open spaces, roof terraces, cultural offers and other spaces, including in tall buildings and along the river and around City landmarks;
14. Supports health and wellbeing within the City's communities; and
15. Is informed by early and meaningful stakeholder engagement, proportionate to the scale and type of development proposed.

#### Quality and character

16. Delivers high quality ~~design, sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail~~ which is visually interesting, well-proportioned and well-detailed and conserves and enhances the ~~local and wider~~ townscape character and appearance of the City, and its historic environment, and takes into account cross boundary impacts of the neighbouring boroughs is appropriate to its neighbours;
10. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
11. Considers lighting as an integral part of the design process, ensuring that internal and external lighting provides the right light in the right place at the right time addressing issues of light spill/trespass to the public realm and the character of the area;
12. Incorporates signage of an appropriate siting, size, form, appearance and illumination within ~~the architecture of~~ the building's architecture;
13. Incorporates necessary security and safety measures as an integral part of the design; and
14. Ensures that the building design concept is maintained from permission through to completion of a project.

## Reason for the policy

- 12.1.1. As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings. Business occupiers are seeking buildings that are designed with high sustainability, accessibility and inclusion, and wellness credentials, and for these to be reflected in the appearance, functioning and design of buildings and their relationship to the wider context.
- 12.1.2. The built environment is a major contributor to carbon emissions. Development should not only seek to minimise emissions but also find opportunities to improve wider sustainability. Retrofitting existing buildings will in many cases result in lower whole life-cycle carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials. As our climate changes, development must play a role in helping to make the City more resilient to extreme weather conditions and the impact of changing climatic conditions.
- 12.1.3. Development has a significant role to play in enhancing the public life of the Square Mile and making it more welcoming for everyone through delivering inclusive and accessible public spaces, vibrancy, destinations, experiences and leisure opportunities as an integral part of new development.

## How the policy works

- 12.1.4. The design approach to each site in the City will be unique and there is a need to consider a broad range of factors through an iterative design process. While sites won't share a singular route through the design process, this City Plan places significant importance on achieving sustainable development through a 'retrofit first' approach. An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the whole lifecycle carbon of different development approaches.
- 12.1.5. Options appraisals should also be informed by the potential for wider environmental benefits before considering the many wider design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.
- 12.1.6. ~~To create a zero emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.~~

- 12.1.7. The City of London will continue to be at the forefront of delivering the highest and most sustainable design standards. All development should demonstrate how it delivers the highest standard of design while also respecting its surroundings and the unique character and history of the City. Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. The diversity of the townscape means that different design considerations apply to each site and these need to be carefully assessed to take account of each building's context. This should not constrain design approaches, and a range of solutions may be appropriate. Liaison with the City Corporation, the City of London Police and the London Fire Brigade is essential at an early stage of design to ensure that buildings and spaces are safe and secure and reduce the potential for anti-social behaviour.
- 12.1.8. The City Corporation will use a variety of modelling techniques to assist in the determination of planning applications. Developers will be required to use modelling techniques to demonstrate compliance with the City Corporation's microclimate and thermal comfort planning advice notes. The City Corporation will use 3D digital modelling technology to assist in considering the visual impact of development, enabling an assessment to be made of the impact of development on townscape and skyline. Developers will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology.
- 12.1.9. The City has a large workforce whose numbers are expected to grow substantially, albeit that increased remote working means that actual footfall may not rise in proportion to total employment. Most journeys within the Square Mile are on foot and pedestrian movement is particularly high during morning and evening peak times. The City has retained much of its historic street pattern, which provides convenient walking routes and allows for a high degree of pedestrian permeability. The City Corporation uses pedestrian modelling to better understand pedestrian flows and to manage the impact of proposed new development. The Transport Strategy sets standards and targets for pedestrian accessibility which will be implemented, in part, through this Plan.
- 12.1.10. The City has numerous small open spaces, which provide valuable amenities, many of which are of historic importance. The design of these small spaces requires innovative and sensitive design solutions which respect their character and setting and create high quality, accessible areas for all the City's communities. The City's streets provide space for public enjoyment, and the City Corporation has a programme of public realm enhancement projects to improve the quality, sustainability, inclusivity and amenity of the public realm.
- 12.1.11. The City provides significant employment, residential and leisure opportunities that should be accessible to all. Accessibility to new and existing buildings and spaces must create an inclusive environment. Adaptation of historic buildings requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and will prepare further guidance for developers.

## Policy DE1 : ~~Sustainability Standards~~ Sustainable Design

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1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.
2. All major development must ~~demonstrate~~ undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach for the site.
3. Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment.
4. Where new buildings are the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest feasible and viable environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area.
5. Innovative design, materials, construction, operation and "end of life" phases of development and technologies should be used to deliver highest standards of environmental sustainability.
6. Applicants must ensure that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.

### Circular economy design approaches

7. Development should be designed to incorporate circular economy principles throughout the life cycle of the building through:
  - Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;
  - Floorspace adaptability to maximise the lifespan of buildings;
  - Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources;
  - Designing for disassembly, reuse and recycling of deconstruction materials;
  - Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and
  - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.

## Sustainability standards

8. Proposals for major development will be required to:

- achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution) Climate resilience credit should be achieved for the waste category;
- commit to achieving a minimum NABERS UK rating of 5 stars;
- demonstrate that London Plan guidance on carbon emissions and air quality requirements have been met on site, ~~retaining embodied carbon within building structures where feasible~~. In exceptional circumstances, where standards cannot be met on site, carbon offsetting will be required to account for the shortfall. This will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects;
- retain existing buildings and structures where feasible to reduce embodied carbon emissions and waste;
- demonstrate climate resilience in building and landscape design; ~~and~~
- incorporate collective infrastructure such as heating and cooling networks, smart grids and collective ~~battery~~ renewable energy storage (for example batteries) wherever possible, to contribute to a net zero-emissions carbon, zero-waste, climate resilient City; ~~and~~
- Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments.

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### Reason for the policy

12.1.12. The ~~drivers~~ factors driving ~~for~~ sustainable development are increasing, ~~affecting~~ impacting both global and local businesses as well as workers, residents and visitors. ~~The businesses that survive will be those that embrace sustainability and responsible consumption.~~ The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City’s priorities:

- Energy, carbon emissions and air pollutants – reducing emissions and moving to a net zero-emissions and zero-carbon city by 2040, in line with the requirements of the City Corporation’s Climate Action Strategy;
- Water – reducing water use in an area of serious water stress;
- Pollution – reducing exposure to poor air quality;

- Materials – retaining embodied carbon in existing buildings and materials, and improving resource efficiency.
- 12.1.13. Social and environmental responsibility is high on the agenda for many City businesses and their workforce and a working environment that supports these goals is essential for the City's future. ~~The London Plan provides a framework for driving forward this agenda, but it needs to be implemented at a local level.~~
- 12.1.14. The City of London ~~Zero Emissions Study 2018~~ Climate Action Strategy provides evidence for the trajectory to a zero emissions net zero carbon City by 2040. The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen infrastructure are essential elements in the delivery of the net zero carbon City, where decarbonised electricity that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides. Therefore, connection to these networks is expected wherever feasible. This will also reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms. ~~subject to appropriate decarbonisation plans.~~
- 12.1.15. As new developments are large consumers of resources and materials, the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition. Proposals for substantial demolition and reconstruction should have regard to whole-life carbon impact, resource and energy use, when compared to the existing building, and must justify why redevelopment and new build is the most sustainable and suitable approach. All development should ensure the reduction, reuse or recycling of resources and materials, and minimise energy use and emissions that contribute to climate change.
- 12.1.16. The application of sustainability standards through this Plan will contribute to the achievement of these objectives of the City's Climate Action Strategy, however, guidance in the area of sustainable development is rapidly evolving and applicants should use the most up to date guidance to inform their planning proposals.
- 12.1.17. The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer, waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.

#### How the policy works

- 12.1.18. The approach to retention and/or redevelopment, built form, whole life-cycle carbon and circular economy for the development should be shaped on



the basis of the insights derived from the carbon options assessment.  
Applicants should work collaboratively through the carbon options process to establish the most sustainable and suitable approach for the site.  
Applicants should demonstrate that they have taken into account principles of sustainable design and that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.

12.1.19. The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are subject to this policy where proposed works constitute development. ~~Refurbishments bring the benefit of re-using some of the existing building's embodied carbon. Standards required are those that are in place at the time of submission of a planning application.~~

12.1.20. Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development.

12.1.21. For major development the following information should be provided  
Sustainability Statement should include:

- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
- an energy assessment in line with the Mayor of London's Energy Planning Guidance. ~~Where carbon offsetting is required, this will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects in the City or elsewhere.~~
- an options appraisal following the City Corporation's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits.
- an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
- details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.
- Whole life cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options Guidance Planning



**Advice Note, fully exploring opportunities to minimise embodied and operational carbon emissions.**

**Extensions:**

- If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, **carbon options appraisal** and BREEAM requirements.

**For minor development**

- Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.

**Circular design approaches**

**EIA development**

12.1.22. **For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should demonstrate how circular economy principles have been incorporated into the development, fully addressing how construction, demolition and excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.**

12.1.23. **A Circular Economy Statement and the WLC carbon assessment following the London Plan guidance should be submitted for all EIA development.**

**Major development**

12.1.24. **For all other Major development proposals, the sustainability statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.**

12.1.25. **A Circular Economy Statement following the London Plan guidance should be submitted for all Major development.**

## All other development

- 12.1.26. For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.

### **Policy DE2: Design Quality New Development**

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1. Development should be of ~~a world-class~~ an exemplar standard of design, aesthetics and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.
2. The design of ~~all~~-new development must ensure that:
  - The ~~bulk and~~ layout, form, scale, massing and appearance of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area;
  - The site layout takes account of established and potential pedestrian desire lines enhancing pedestrian permeability;
  - Buildings and public spaces are inclusive and accessible for everyone;
  - The architecture and urban design function well, are visually attractive with high quality detailing, finishes and materials, and enrich the overall quality of the area for the long term;
  - Elevations have active, engaging and welcoming street frontages;
  - The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements;
  - Innovative design approaches are used to create high quality buildings that meet high sustainability standards, and integrate well with the surroundings;
  - It is constructed using appropriate, high quality, low carbon, sustainable and durable materials ~~are used~~;
  - ~~The design and materials~~ It avoids unacceptable wind, loss of daylight and sunlight and thermal comfort impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
  - ~~Development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;~~

- The proposed uses and activities can be are accommodated within the curtilage of the development and do not rely on use of the public realm, including the use of public highway;
- The plant and building services equipment are fully screened from view and integrated into the design of the building such that there are no adverse impacts on amenity in surrounding areas;
- ~~Service entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;~~
- ~~There is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening;~~
- ~~Buildings are inclusive and accessible to all;~~
- ~~Security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design; and~~
- ~~Opportunities are taken to enhance the~~ The form, profile and appearance of the roofscape adds visual interest and complements the building.

3. Applicants will be encouraged to undertake meaningful developer-led engagement before submitting their planning application in line with the Developer Engagement Guidance;

4. Applicants will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology. These visualisations should be used to inform pre-application and post application consultation with local communities and stakeholders.

5. Applicants will be required to ensure the quality of the approved development is not materially diminished between permission and completion as a result of changes to the permitted to scheme.

#### Reason for the policy

12.1.27. Buildings and spaces around buildings affect us all – they are where we live, work and spend our leisure time; they shape our experiences as we spend time in them and move around them. Therefore central to delivering the right kind of growth, it is important to ensure that buildings are of high quality design;

12.1.28. Given the exceptional quality of the City's built environment, it's essential for new developments to capture and enhance the qualities and characteristics that make it a special place; The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are all characteristic of, and combine to

produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

#### How the policy works

12.1.29. This policy expects applicants to approach the design of new buildings, extensions or modifications to existing buildings in an interesting, innovative and appropriate manner. Whilst no particular architectural style is encouraged, the expectation is that every scheme should be of the highest quality meeting the requirements set out in this policy and should be based on a sound understanding of the site and its context. A series of key characteristic features have been identified in the City's Character Areas Study, which should be applied to understand the underlying character of the different areas of the City. In assessing development proposals, careful consideration will be given to the scale, form, massing, appearance and those distinctive features that contribute to the area's unique identity and local character.

12.1.30. Good design is a key aspect for creating places, buildings or spaces that work well for everyone, look good, last long and can adapt to the changing needs of future generations. Making the right choices at all levels of the design process is therefore very important. The development proposals will be required to clearly articulate the design evolution from the conceptual stage to the final product. This narrative should be set out in the Design and Access Statement and should address the key design aspects outlined in the National Design Guidance:

- the layout
- the form
- the scale of buildings
- their appearance
- landscape
- materials
- their detailing

12.1.31. ~~In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and architectural detailing.~~

12.1.32. Wind conditions and solar glare may have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions, thermal comfort and solar glare. Any adverse impacts **should be minimised and unavoidable impacts** will need to be mitigated. Appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published guidelines for developers on wind microclimate studies required to support planning applications. Further guidance is available on

solar glare, solar convergence and **daylight and** sunlight impacts of development. ~~The City Corporation will publish a further Planning Advice Note for developers on addressing thermal comfort in the public realm.~~

- 12.1.33. The design and **implementation execution of building** extensions and alterations ~~to buildings~~, such as entrances and windows, are **important of considerable importance since because** they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated into the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.
- 12.1.34. In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Blank frontages and ventilation louvres should be avoided. Ventilation louvres, where necessary, should be located away from busy streets. ~~Servicing entrances should be carefully designed to minimise adverse effects on the townscape.~~
- 12.1.35. ~~Buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs. Proposed uses must not rely on the use of space in the public realm, including the use of public highway.~~
- 12.1.36. ~~The City of London has many public and private viewing galleries, terraces and tall buildings, meaning that many workers, residents and visitors see the townscape from above. Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the building as viewed from surrounding buildings as well as from the ground. The potential to add visual interest to a roofscape, including greening, should be designed in from the outset.~~
- 12.1.37. Plant should be located below ground. Where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants. ~~Consideration should be given to the use of external heating and cooling supplies from district heating and cooling networks, such as the Citigen network, where available, as these may avoid or reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms, as well as providing wider environmental benefits.~~
- 12.1.38. Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas. ~~Gates and doors should~~

~~be well designed and should be kept closed when the entrance to the service bay is not in use.~~

- 12.1.39. Ventilation or extraction systems should be routed internally, and extensive or unsightly external ducting will not normally be permitted. Provision must be made within the building for services and ducting to and from all uses. Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, developers and/or occupiers should investigate the potential to vent emissions to the roof. Developers should provide suitable rooftop ventilation, where appropriate. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways.
- 12.1.40. ~~Developments should incorporate suitable off-street facilities for smokers wherever possible to avoid the need for smokers to congregate on the pavements.~~
- 12.1.41. ~~Developers should provide suitable rooftop ventilation for the City's sewer network, where appropriate, and this should be integrated into the design of buildings.~~
- 12.1.42. ~~Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development.~~

### **Policy DE3: Public Realm**

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The City Corporation will work in partnership with developers, Transport for London and **Business Improvement Districts (BIDs), and other key stakeholders organisations** to design and implement schemes for the enhancement of ~~the~~ streets and spaces ~~between buildings~~ and the creation of new spaces including public squares, parks, open spaces, viewing galleries, rooftops, forecourts, streets, courts, alleyways, routes and spaces between buildings.

#### **Public Realm Design**

Public realm schemes ~~must be of a high standard of design, sustainability, surface treatment and landscaping,~~ must have regard to:

1. The need to provide high quality, inclusive, welcoming, well designed, safe, and functional public realm that takes into account how people will use the space;
2. The wellbeing of users ensuring appropriate shade and shelter, provision of areas with access to direct sunlight and taking into consideration



microclimatic conditions including temperature, wind, exposure to noise, air pollution to create places that encourage people to dwell and spend time;

3. The predominant use and function of the space and adjacent spaces;
4. The use of sustainable natural and high quality materials, avoiding an excessive range and whilst harmonising the proposals with the surroundings of the scheme and the materials used throughout the City;
5. The inclusion of trees and The need to increase the provision of green infrastructure, including tree planting, urban greening, soft landscaping and the promotion of the delivery of net gains in biodiversity, and where feasible linking up to link up existing habitats, green spaces and routes to provide green corridors;
6. The City's heritage, identifying, and retaining, and better revealing features that contribute positively to the character, cultural and leisure experience and appearance of the City;
7. The need to integrate high quality public art as part of the public realm design;
8. The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate the implementation of rainwater recycling management;
9. The need to improve pedestrian amenity, provide accessible and inclusive design that meets the needs of different users ensuring that streets and walkways remain uncluttered and encourage walking, cycling and wheeling enhance pedestrian permeability; and
10. The promotion of active travel, delivering interventions which improve the design of streets and spaces for pedestrians and cyclists in line with the Healthy Streets Approach;
- ~~11. The need to provide a high quality, safe and functional public realm;~~
12. The sensitive co-ordination of lighting with the overall design of the scheme;
13. The need to provide public amenities including seating and free water drinking fountains.
- ~~14. The wellbeing of users in relation to air pollution, noise, temperatures, shading and microclimate.~~

### Inclusive and Accessible Public Realm

The public realm should be welcoming, inclusive and accessible to all; it should be free to use and access.

Development proposals should:

1. Provide inclusive and accessible public realm that meets the existing and future needs of all user groups;



2. Ensure public spaces are open, welcoming, inclusive, free to use, and fully publicly accessible and that appropriate management and operational arrangements are in place. Where the development creates new public realm or affects the use of existing public realm, it should be ensured that public access to the space is maximised and the rules governing the space are minimised to those required for its safe management, in accordance with the Mayor's Public London Charter. A Management Plan should be provided setting out how the space will be used and managed at different times of the day and different days of the week.
3. Ensure public spaces are free to use and access and align with the principles contained in the Mayor's Public London Charter; any restrictions to public access will only be allowed in exceptional circumstances, subject to a legal agreement and should be the minimum necessary, appropriate and reasonable.

#### Reason for the policy

- 12.1.43. The City of London is a dense urban environment, with a limited amount of public realm. Most streets and public spaces accommodate a high level of pedestrian footfall and perform a variety of functions above and beyond accommodating the movement of people. The City's streets and public spaces are where public life takes place, where workers, residents and visitors experience the City as a whole. Given the limited amount of space available at ground floor level in the City, public realm proposals must make effective use of the limited land resource and be of the highest design quality, maximising benefits for the public.
- 12.1.44. To attract a greater and more diverse range of people to the city at different times of the day and on different days of the week, the design of the public realm must cater for a wide variety of requirements. The management and curation of the public realm influences how it is used and its appeals to different user groups. Management and maintenance of public space should be limited to minimise rules governing public spaces to avoid management regimes being implemented that set unnecessary rules for how people should behave. Whether publicly or privately owned, public realm should be open, free to use, welcoming and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are essential for safe management of the space.
- 12.1.45. ~~The City Corporation will actively promote schemes for the enhancement of the street scene and public realm.~~ High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

#### How the policy works

- 12.1.46. The City Corporation will actively promote schemes for the enhancement of the public realm in accordance with the Healthy Streets Approach, the Mayor's Public London Charter, the Mayor of London's Streetscape Guidance, the City of London Public Realm SPD, the City of London Public Realm Toolkit, the City of London Transport Strategy and the Climate Action Strategy.
- 12.1.47. Developers will be required to demonstrate that public realm enhancements will improve the function and appearance of the space. An assessment will be required to demonstrate how the development will function in terms of the use of the public space, pedestrian desire lines, and potential congestion or conflict, and what public realm enhancements will be required to deliver a functional, inclusive, accessible, safe and attractive public space.
- 12.1.48. Public realm design should follow best practice place-making principles, by creating site layouts that positively respond to the context and microclimatic conditions, and using materials that harmonise spaces. Development proposals that deliver new or improved high quality public space will be encouraged and the provision of outdoor public space at ground level will be prioritised. There will be a particular focus on creating new routes and spaces that link the public realm network, connect key destinations in the City, and provide attractive walking and cycling routes and public spaces. These spaces should encourage people to dwell and spend time, and provide amenity for people's health and well-being.
- 12.1.49. The provision of tree planting will be encouraged to improve climate resilience, provide shade and visual amenity. It should be ensured that tree planting is feasible with below ground constraints.
- 12.1.50. A draft public realm management plan must be provided at the pre-application stage, outlining how the public realm will be designed and managed in accordance with the London Plan and the Public London Charter principles. Public realm management plans will be secured through s106 agreements. These plans should ensure that the design, and management regime that govern public spaces maximises public accessibility and supports the requirements of this policy. It should demonstrate how the public space will operate and be managed at different times of the day, and at different times of the week.
- 12.1.51. Through site analysis and public engagement, developers should identify existing uses and users of public space and develop proposals that support and encourage the existing and future use of the space, while seeking to ensure public spaces are inclusive and accessible for all.
- 12.1.52. Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, the Mayor of London's Streetscape Guidance and the Public London Charter.

12.1.53. The City Corporation will undertake public realm enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the Community Infrastructure Levy and funding from external sources to deliver enhancement works.

~~12.1.54. All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City. Consideration should be given to design features which prevent damage from the activities of skaters, such as metal studs incorporated into street furniture and hard surfaces. Designs should be robust and durable and use sustainable and low carbon materials.~~

~~12.1.55. The incorporation of artworks or integral decorative features, such as sculptures, fountains and schemes included in the City Arts Initiative, to create animated spaces, will be encouraged. Early consideration of their design, management and maintenance regime. Detailed guidance is provided in Policy CV5.~~

~~12.1.56. Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, and the Mayor of London's Streetscape Guidance.~~

#### **Policy DE4: Pedestrian permeability**

- ~~• Improved wayfinding will be sought through public realm improvements.~~

~~1. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:~~

- ~~• Providing legible, good quality, safe and low pollution pedestrian connections between spaces;~~
- ~~• Providing new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;~~
- ~~• Providing publicly accessible ground floors for improved pedestrian movement, where feasible;~~
- ~~• Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.~~

~~2. Developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest.~~

#### Reason for the policy

~~12.1.57. The intensification of the use of buildings and the increase in the City's working population are putting added pressure on the capacity, convenience, comfort and~~

safety of the spaces, streets, lanes and alleys at the heart of the City. Peak times are particularly busy for all forms of transport, and the potential for conflict between modes of travel is increased.

12.1.58. Most travel in and through the City is on foot. The City Corporation has adopted Transport for London's Legible London as a means of improving wayfinding within and through the City of London.

#### How the policy works

12.1.59. In order to reduce pedestrian congestion and improve pedestrian access through the public realm, new pathways for moving through the City will need to be created or re-established. Spreading the footfall across a wider area will help to create a more vibrant and comfortable street network.

12.1.60. Development will be expected to deliver net gains in the public realm, through the establishment of new pedestrian routes around and through buildings, having regard to the cumulative impact of their development alongside existing and permitted development on the capacity of pedestrian routes. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected and permeability of the City compromised. The City Corporation has developed a block size analysis which identifies large impermeable street blocks across the City in order to prioritise the identification of new pedestrian routes through development proposals. Over the Plan period the aim is to reduce the proportion of larger street blocks (shown in blue on Figure 11) and to increase the proportion of smaller blocks.

12.1.61. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

### **Policy DE45: Terraces and Elevated Public Spaces Viewing Galleries**

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1. Roof terraces will be encouraged where:

- The roof terrace is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;
- There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;
- Historic or locally distinctive roof forms, features or structures can be retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace optimises the potential for urban greening;

- Emissions from combustion plant will not affect users of the terrace.
2. Where roof terraces and [elevated public spaces viewing galleries](#) are proposed, [safety and](#) security risks must be addressed at the design stage and space for security checks [and any hostile vehicle mitigation](#) incorporated into the development, where required.
  3. ~~The provision~~ [Requiring all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces](#) ~~areas will be required as part of all tall building or major developments,~~ which may include roof gardens, ~~and~~ terraces, ~~or~~ public viewing galleries, [or other retail or leisure facilities to create attractive destinations for people to enjoy the City's spectacular skyline and views at upper levels, where appropriate.](#)
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#### Reason for the policy

12.1.62. Roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

#### How the policy works

12.1.63. The City Corporation encourages proposals for roof gardens and terraces where they are sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive and where they do not impact adversely on residential amenity. There should be no impact on strategic or locally protected views, [including from planting.](#)

12.1.64. Where roof terraces and gardens are publicly accessible, entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Security implications should be considered at the design stage of the development, including making provision for security checks within the development [and hostile vehicle mitigation](#), where required. Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels or result in unacceptable light spillage in areas with residents or other sensitive uses. Appropriate safety features should be included to [prevent people from jumping reduce the potential for suicide](#) or falling [from buildings](#). The City Corporation [has adopted is producing guidelines a Planning Advice Note on Preventing Suicides in High Rise Buildings and Structures](#) to advise developers on best practice to reduce the potential for suicides from tall buildings. The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.

12.1.65. Public access to tall buildings within the City is important in creating an inclusive city. Tall buildings should provide publicly accessible, [step-free](#) areas

~~which that~~ are free to enter and inclusively designed. These may include public viewing galleries at upper levels or other forms of open space provision and may provide retail, leisure or educational facilities to enhance their attraction, where this would not undermine the inclusivity of the space.

## **Policy DE56: Shopfronts**

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Shopfronts should be of a high standard of design and appearance to create an attractive and welcoming retail and leisure experience on City streets.

Inappropriate designs and alterations will be resisted. Shopfront proposals should:

1. Help to create active frontages, designed in ways that facilitate the visual and physical permeability of the building;
  2. Respect the quality and architectural contribution of any existing shopfront;
  3. Maintain the relationship between the shopfront, any fascia, the building and its context;
  4. Use materials which are sympathetic to the wider context and are of high quality;
  5. Ensure that signage is in appropriate locations and in proportion to the shopfront;
  6. Take into account the impact of louvres, plant and access to refuse storage;
  7. ~~Ensure that~~ Consider the potential to use awnings and canopies to provide shade and mitigate against adverse climate impacts. Where they are provided, they should ~~are positioned only in locations where they would~~ not harm the appearance of the shopfront, obstruct architectural features or views and are should be in compliance with highway requirements;
  - ~~8. Avoid openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity of the area;~~
  9. Avoid external shutters and contain alternative security measures, where required;
  10. Avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
  11. Ensure that the design is inclusive incorporating level entrances and adequate door widths; and
  12. Ensure that internal shop lighting does not create inappropriate light spillage into the public realm.
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### Reason for the policy

12.1.66. Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.

12.1.67. Existing shopfronts should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed



buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

#### How the policy works

12.1.68. New shopfront proposals should relate to the upper floors of the building and surrounding buildings, providing consistency with neighbouring premises, where appropriate. New shopfronts should utilise high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth) ~~which~~ that are out of proportion or scale with the shopfront or have a detrimental visual effect on the building or the street scene.

12.1.69. Modification to shopfronts and shopfront designs to incorporate louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building where they cannot be accommodated in less sensitive elevations. The use of awnings and canopies should be considered to address climate impacts, where appropriate, and should be integrated into the shopfront design in relation to size, location and materials.

12.1.70. Fully openable shopfronts and large serving openings may be refused where they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.

12.1.71. Required security measures should be internal to limit their visual impact on shopfronts and deliver an active frontage. External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts. Internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.

Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that ~~enable~~ inclusive access by all. ~~Other measures and movable portable ramps should be used exceptionally where level entrance is not feasible.~~ Where alterations would have an impact on heritage assets, all feasible options should be explored to provide the highest levels of inclusion.

#### **Policy DE67: Advertisements**

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1. Advertising must be of a high standard of design, restrained in amount and in keeping with the character of the City.
2. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted.



**3. Advertising flags and banners may be appropriate to support cultural institutions.**

**4. High quality temporary advertising associated with one-off events may be appropriate, where it would contribute to the vibrancy of the Square Mile and make a positive contribution to amenity and public safety.**

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Reason for the policy

12.1.72. To protect and enhance the character of the City's streets, the City Corporation considers that advertising material should be restrained in quantity and form. Poor quality advertisements harm the street scene and the unique character of the City of London. The City Corporation will exercise advertisement control having regard to visual amenity and public safety and will seek improvements to the design of advertisements, where necessary.

How the policy works

12.1.73. Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the character of the City. The display of advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however, provide an opportunity to add interest to the street scene by including images and information about the development under construction. **Artificial greening on hoardings should be avoided.** Further guidance is contained in the City Corporation's Hoardings Advice Note **and in the City of London's Considerate Contractor Scheme Code of Conduct.**

12.1.74. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.

12.1.75. Particular care will be necessary with advertisements on or in the setting of listed buildings and within conservation areas. Internal illumination of advertisements in such areas will not normally be permitted.

12.1.76. Advertisements above ground level are **frequently** detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features and the City's streetscape and skyline. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.

12.1.77. Appropriate action will be taken to have unauthorised advertisements removed. The City Corporation's Transport Strategy requires that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

### **Policy DE78: Daylight and sunlight**

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1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings **and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship** and open spaces, is appropriate for its context and provides acceptable **living standards of daylight and sunlight**, taking account of the Building Research Establishment's guidelines.
  - 2. Development proposals should have regard to the daylight and sunlight levels of historic interiors and should seek opportunities to improve daylight and sunlight levels where this would be achievable and appropriate.**
  3. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.
  4. Development should incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and public realm.
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#### Reason for the policy

12.1.78. The City is an urban centre with a very high density of buildings, resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents. **Daylight and sunlight can enhance historic interiors, particularly those that have a cultural or community function including religious buildings.**

#### How the policy works

12.1.79. The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Given the importance of the City's open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. Developers will be required to submit daylight and sunlight assessments **and undertake radiance studies** in support of their proposals. The

City Corporation may require independent verification of these assessments at the developer's expense.

- 12.1.80. When considering proposed changes to existing lighting levels, the City Corporation will take account of the retained levels of daylight and the cumulative effect of development proposals, and existing levels of light if they are low. The City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site as well as the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. The City Corporation will publish further guidance for City developers on how it expects BRE guidance to be used and interpreted, including guidance on the use of methodologies such as radiance studies to enable better understanding of daylight and sunlight impacts to a range of existing land uses.
- 12.1.81. Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered beneficial in the public interest and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

#### **Policy DE89: Lighting**

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- 1. Development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, relevant open spaces and community uses. The design of lighting should be informed by the potential impacts on biodiversity, and should seek to make the City a safer and more welcoming place to be for all its communities after dark.**
  2. The external lighting of buildings should contribute positively to the unique character and – where relevant – grandeur of the City townscape by night.
  3. External lighting of heritage assets within the City must be sympathetic to the building and the wider context in terms of tone and brightness.
  - 4. Applications for major development and for lighting schemes should follow the submission requirements set out in the Lighting SPD (Lighting Strategy, Lighting Concept and Technical Lighting Design). All other applications should address how lighting has been considered as part of the submission.**
- ~~1. Lighting should be sensitively co-ordinated with the overall design of any new development, having regard to siting, scale, type, intensity and colour temperature of light. Development proposals should Lighting early in the design process.~~

5. ~~Development should incorporate measures to reduce light spillage from external and internal lighting, particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.~~
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#### Reason for the policy

12.1.82. ~~Lighting~~ The City Corporation's Lighting Strategy contributes to the City's wider aims of **to improve** the night-time offering and **creating** an after-dark street experience that befits a world class business and cultural centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.

12.1.83. **Development has the potential to positively or adversely affect the level and quality of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as on biodiversity movement, accessibility, safety, security as well as the reduction of energy use and light pollution.**

**Sensitively designed lighting schemes can improve accessibility for disabled people by reducing glare and excessive contrast. Well-designed lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light pollution, which can impact residential amenity, undermine biodiversity and cause harm to wildlife. Impacts on the City's open spaces – including the riverfront – are important considerations.**

12.1.84. ~~Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes can improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light spillage concerns for neighbouring residents with a potential impact on wellbeing. Avoidance of light spillage onto urban green spaces is crucial for biodiversity.~~

#### How the policy works

12.1.85. The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it enhances the overall experience of this unique area, and provides orientation and wayfinding after dark.

- 12.1.86. ~~The Illuminated River art project, to be implemented fully by 2022, will enhance the visual impact at night time through lighting of all 5 bridges located in the City. This will be complemented by a reduction in street lighting on the bridges.~~
- 12.1.87. The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting of historic buildings and limit adverse effects upon adjacent areas, uses and biodiversity.
- 12.1.88. ~~There is potential for badly designed lighting schemes to generate light pollution with adverse impacts on neighbours and the natural environment, as well as incurring unnecessary costs for the occupier.~~ The design of lighting schemes should be considered at an early stage in the development design process, having regard to the City of London Lighting ~~Strategy~~ SPD. **For major applications and lighting schemes,** Developers should submit a Lighting Strategy **at pre-application stage, a Lighting Concept** with their planning application, **and Technical Lighting Design details through condition if the application if a proposal includes the installation of external lighting or light spillage into the public realm is approved. All other applications should consider the lighting impacts as part of the application.**
- 12.1.89. ~~The City Corporation will prepare further planning guidance to assist developers in the design of appropriate lighting schemes. Detailed information on requirements for lighting can be found in the City of London Lighting Strategy.~~
- 12.1.90. **Owners, occupiers and managers of existing buildings will be encouraged to adopt the principles set out in the Lighting SPD by signing up to the 'Considerate Lighting Charter' in the SPD.**

# 13. Transport

## 13.1. Vehicular Transport and Servicing

### Context

The City is served by an extensive public transport network with six mainline railway stations, 12 underground and DLR stations and an extensive network of bus routes. Transport for London identifies the whole of the City of London as having a Public Transport Accessibility rating of above 6, the highest possible score. In addition, major rail termini near the City are used by large numbers of City commuters. Significant improvements are being made to public transport provision, particularly with the opening of the Elizabeth Line with two stations in the City at Farringdon and Liverpool Street/Moorgate. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City.

The City has access to a very wide regional labour pool with many of its businesses drawing their workforces from destinations across London and the wider South East. The provision of safe, convenient, sustainable and effective public transport services and facilities is critical to the City's international competitiveness and its ability to continue to attract highly skilled workers. Given the unique nature of the City, with its comparatively low residential population and its dependence on inward commuting, the widely publicised '15-minute cities' concept is not directly relevant to the City's circumstances. For instance, some services for City residents are provided in adjoining boroughs through partnership working arrangements, since it may not be cost effective to deliver those services within the Square Mile. The policies in this Plan seek to facilitate ease of access to jobs and services by walking and cycling for those who are able to do so, including ensuring good connections to neighbouring boroughs.

Traffic in the City has changed significantly over the last two decades, both in terms of total volume and overall composition. Biennial traffic counts across the City show a 40% decrease in overall traffic volumes, with greater reductions for motor vehicles such as cars and light goods vehicles. The greatest observed reductions have coincided with key events such as the introduction of the Congestion Charge Zone, the global recession and the introduction of cycle superhighways. The street capacity unlocked by these reductions, alongside increases in cycling infrastructure provision, has facilitated an estimated tripling of cycling volumes across the City.

Despite traffic reductions, there are still significant challenges. Traffic counts in 2017 found a slight increase in car volumes probably caused by the increasing volumes of private hire vehicles. Freight vehicle numbers, after dropping significantly between 1999 and 2004, have levelled off in recent years. The rapid increase in cycling volumes seen in the first decade of the 21st century has not been sustained, with volumes slightly decreasing in recent years.



~~The demands on the City's transport network are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation published a long-term Transport Strategy in 2019 which sets the key priorities for the City's streets and how the network is used. The Transport Strategy was developed in parallel with the drafting of the Local Plan and the policies set out in both are aligned. Measures to support the City's Covid-19 recovery may provide an opportunity to accelerate delivery of some elements of the Transport Strategy.~~

~~The Mayor's Transport Strategy provides London-wide guidance, which is implemented through the City's Local Implementation Plan. Transport providers serving the City publish plans and strategies that influence investment and management decisions affecting the City's transport network.~~

### **Strategic Policy S9: ~~Vehicular~~Transport and Servicing**

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The City's transport infrastructure will be maintained and improved by:

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity, ~~including the Northern Line/Bank Station upgrade~~. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused.
2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations and river piers.
4. Minimising road danger and congestion, and reducing vehicle emissions by:
  - **Not providing any additional on-street car and motorcycle parking;**
  - **Identifying opportunities to use on-street parking reductions and restrictions to discourage private vehicle use;**
  - Designing and managing streets in accordance with the City of London street hierarchy;
  - Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle ~~for shorter distances~~;
  - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
  - **Requiring Encouraging** the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;



- Using traffic management measures and street works permits to improve journey time reliability on the City’s roads; and
- Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, [promoting best practice such as direct vision standards](#), including through the use of river transport.

### Reason for the policy

13.1.1. The City’s strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. [People walking and cycling make up more than two-thirds of all observed travel activity in the City. A third of all travel movements take place in the four peak hours: 8am to 10am and 5pm to 7pm. Over 90%](#) of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The City is already a highly sustainable location, and the opening of the Elizabeth Line ~~will~~ [has result resulted](#) in a wider catchment area within an hour’s journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London to help secure improvements to public transport, for instance by safeguarding land from other forms of development where necessary.

13.1.2. The City’s Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places.

<b>Movement function</b>	<b>Proposed category</b>
Through traffic – the preferred streets for motor vehicles that do not <a href="#">start or finish their journey have a destination</a> in, or immediately adjacent to, the Square Mile.	London Access streets (TfL network)
Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access streets
Access – used for the first or final part of a journey, providing access to properties.	Local Access streets

Table 3: City of London street hierarchy

13.1.3. The TfL network (classified as London Access) is expected to accommodate the majority of through traffic, while roads which are managed by the City Corporation are classed as either City Access or Local Access. ~~Proposed~~ Changes to the highway network at Bank Junction and the proposed changes to the St Paul's Gyratory ~~and Beech Street~~ are reflected in the street hierarchy.

#### How the policy works

13.1.4. The City's Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City's streets, with targets proposed to reduce the number of motor vehicles in the City from the 2017 baseline by at least 25% by 2030 and at least 50% by 2044. In 2022, motor vehicle traffic has already seen a 26% reduction from 185,000 vehicles in 2017 to 137,000 vehicles. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.

13.1.5. Achievement of the targets is dependent on measures introduced by the Mayor of London and TfL, ~~such as the Central London Zero Emission Zone~~, although the City Corporation will explore specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.

13.1.6. The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.

13.1.7. The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.

13.1.8. The City Corporation will require developers and occupiers to minimise the impact of freight and servicing trips through measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.

13.1.9. Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City's streets.

#### **Policy VT1: The impacts of development on transport**

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1. Development proposals must have a positive impact on highway safety for all users in accordance with the Transport Strategy and Vision Zero ambition, and should not have adverse effects on the City's transport networks.

2. Where development would result in adverse impacts on the transport network, these must be **demonstrated at pre-application stage and** mitigated through site/building design, **public highway works** and management of operational activities. Appropriate measures **to adapt public highway to mitigate the impact of the development** will be sought via planning contributions or by legal agreement. **There should be no reduction in the quality or function of the public highway as a result of development, and improvements should be sought where feasible.**
3. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
4. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) are required for all developments that exceed the following thresholds:

Land Use	Thresholds
Offices	1,000m <sup>2</sup>
Residential	10 units
Retail	1,000m <sup>2</sup>
Hotel	10 bed spaces
Health	1,000m <sup>2</sup>
Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m <sup>2</sup>

5. A Construction Logistics Plans is required for all major developments or refurbishments and for any developments that would have a significant impact on the transport network during construction.

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#### Reason for the policy

- 13.1.10. Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.
- 13.1.11. **Major developments can have a significant impact on the function of existing streets and spaces and any adverse impacts must be mitigated by highway works and public realm interventions that enhance the quality of the City's streets and public spaces.**

#### How the policy works

- 13.1.12. An assessment of the transport implications of development, during both construction and operation, should address the impacts on:
- Road danger;
  - Pedestrian environment, pedestrian and cyclist environment and movement, infrastructure provision;
  - ~~Cycling infrastructure provision;~~
  - Public transport; and
  - The street network.
- 13.1.13. Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.
- 13.1.14. For major developments, developers must demonstrate at pre-application stage the impact of the proposed development on the streets and spaces including the increase in pedestrian, cycle and vehicular numbers. Any proposals that substantially affect the use and function of an existing street or public space will be required to mitigate the impact of their development through appropriate highways works and public realm enhancements.
- 13.1.15. For applications that meet the relevant thresholds, a robust transport assessment is required, and an initial highways design general arrangement plan (at 1:200 scale), should be submitted, highlighting the highways works that would form part of a Section 278 Agreement. As a minimum, the reconstruction/reinstatement of the streets adjacent to the planning application site should be incorporated within the proposals.
- 13.1.16. Proposals for works to the public highway should be developed in accordance with the Transport Strategy, City of London Public Realm Toolkit, the City of London COLSAT Tool, the City's Healthy Streets Plans and other relevant guidance.
- 13.1.17. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) should be used to demonstrate adherence to the City Corporation's Transport ~~Standards~~ Strategy. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website.
- 13.1.18. A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and

Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs).

- 13.1.19. ~~Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.~~

## **Policy VT2: Freight and Servicing**

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1. Applicants should consult with the City Corporation on matters relating to servicing at an early design concept stage. ~~Development should be designed to provide for on-site servicing, wherever practicable.~~
  2. Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation. ~~New technologies will be encouraged to~~ **and use technological and procurement solutions that** enable efficient servicing and deliveries to sites.
  3. **Development should be designed to provide for on-site servicing bays within buildings, wherever practicable.** On site servicing areas must be **provided of a sufficient size and design** to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Servicing areas must be equipped with electric vehicle fast charging points. **The use of servicing lifts will be required where this approach would be beneficial for creating attractive and inclusive public realm.**
  4. Delivery to and servicing of development must take place outside peak **pedestrian** hours (i.e. ~~avoiding no~~ deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries ~~should be made in the late evening or at weekends outside of residential areas~~ **must take place outside the hours of 11pm – 7am on all days of the week.** Areas of high footfall **or in proximity to sensitive land uses** may be subject to further restrictions, **especially areas near cultural and visitor attractions and transport hubs.**
  5. Developers should ~~consider minimise ways to reduce~~ congestion **and emissions** caused by servicing and deliveries **through ensuring, such as implementing** last mile deliveries **are made** by foot, cycle or zero emission vehicle, and should **seek opportunities to support deliveries to the City by river and rail freight.** ~~justify where such measures are not possible.~~ Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.
  6. Provision should be made within **buildings servicing bays** for shredding operations. **On-street shredding will not be permitted.**
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## Reason for the policy

- 13.1.20. The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles. ~~The City Corporation is working with local employers to support them in freight consolidation and to share best practice and ideas, for example through the Cheapside Business Alliance and the Active City Network.~~
- 13.1.21. Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of ~~different forms of consolidation, including 'virtual' as well as physical consolidation,~~ will be required help to minimise the number of trips required to service a development during construction and operation, as does the use of ~~Virtual consolidation involves techniques such as~~ preferred suppliers or nominated carriers to serve a multi-tenanted building. ~~Opportunities to trial and support freight innovation through new technology will be explored as part of the City Corporation's Future City Streets programme.~~
- 13.1.22. Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's Transport Strategy ~~outlines the Corporation's intention to work with a partner haulier to provide a consolidation service for the City of London by 2022 and to establish a sustainable logistics centre to serve the Square Mile by 2030. This centre would co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriering services. It would be supported by~~ aims to use the planning process to require consolidation for new developments, while encouraging existing buildings and BIDs to use consolidation. Last mile logistics hubs ~~within the City to~~ can facilitate more deliveries on foot, by cycle bike and by small electric vehicles.
- 13.1.23. Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles. ~~To reduce emissions from delivery vehicles, electric vehicle charging points will be required within service areas for freight vehicles.~~

13.1.24. In order to decrease freight vehicles in the City, the Transport Strategy aims to encourage freight into the City with rail. The City will work with Network Rail to explore opportunities for inward freight into mainline rail stations and encourages developers to support this.

13.1.25. On-street shredding operations associated with building occupation creates noise and congestion ~~on-street~~ and can have an adverse impact on the amenity of neighbouring uses.

How the policy works

13.1.26. Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom should be provided of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas.

13.1.27. Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development, a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. DSPs should set out the following (as appropriate):

- The number of vehicle trips that have been avoided as a result of the use of consolidation of servicing and deliveries
- Procurement measures (including those taken jointly with other businesses) that would reduce the numbers of delivery and servicing trips
- A commitment to the use of zero emission vehicles and how their use and the use of deliveries on foot and by cycle will be facilitated
- Appropriate routing for vehicles, including to and from consolidation centres, taking account of the City's street hierarchy and addressing the potential for river and rail freight
- Proposals for monitoring delivery and servicing arrangements, including consolidation.

~~13.1.28. Where consolidation of servicing and deliveries is proposed, the number of vehicle trips that have been avoided as a result should be set out in the DSP. Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP. Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries. The DSP should set out~~



~~proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. The City Corporation will work with developers and occupiers to monitor the actual reductions in deliveries achieved through consolidation.~~

- 13.1.29. Out of hours servicing is required, except in residential areas where night-time deliveries ~~should~~ **must** be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing.
- 13.1.30. Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP. Where appropriate, construction deliveries may be accepted outside of normal working hours and the management of such deliveries should be explained in the DSP.
- 13.1.31. ~~Provision should be made within off-street, in-building, servicing bays for shredding operations to reduce the potential for disturbance to neighbours. On-street shredding will not be permitted.~~
- 13.1.32. Further information is set out in the City of London's Freight and Servicing SPD.

### **Policy VT3: Vehicle Parking**

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1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised ~~for~~ **as sites for last mile delivery hubs and other** alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported if it is demonstrated that they are no longer needed for a transport-related function.
4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as near stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

Reason for the policy

13.1.33. The City has excellent public transport accessibility and all development should therefore be car-free (except for designated Blue Badge spaces) unless it can be demonstrated that there are exceptional circumstances which justify limited car parking, in line with London Plan standards.

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#### How the policy works

13.1.34. Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. Any such parking should be marked out as such and restricted only for these users.

~~13.1.35. The City's public car parks were mostly constructed during the 1960s. Some are now underused, and the City Corporation is actively developing proposals to establish last mile delivery hubs within those car parks. Other transport-related infrastructure may be suitable in under-utilised car parks.~~

~~13.1.36. Evidence will be required to demonstrate that a car park is no longer required for a transport-related purpose if conversion or redevelopment to an alternative land use is proposed.~~

#### **Policy VT4: River Transport**

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1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore;
2. Improvements to piers and other river-based transport infrastructure to enable an increase in passenger and freight transport by river will be supported, alongside opportunities for new river-based transport.
- ~~3. The City Corporation will seek the reinstatement of Swan Lane Pier for river transport uses, and development which that prejudices this reinstatement will not be permitted. ~~The reinstatement of Swan Lane Pier will be for a flexible multi-use pier.~~~~
4. The permanent mooring of vessels along the riverfront will be resisted in order to maintain views of the river and heritage assets, allow public enjoyment of the riverfront and minimise potential impacts on archaeology, ecology, and amenity.
5. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site, support improvements to Walbrook Wharf that would improve its operation, and seek opportunities for the use of the wharf for transfer of goods, where this would not undermine its safeguarded role.

6. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.
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#### Reason for the policy

- 13.1.37. Walbrook Wharf is the only active river wharf in the City and **will needs to** be retained as a waste facility and river wharf in line with the associated Ministerial Safeguarding Direction and the London Plan ~~and the Mayor's Safeguarded Wharves Direction~~. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site **and improve its operation**, there may be potential to use Walbrook Wharf for freight logistics.
- 13.1.38. Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.
- 13.1.39. Swan Lane Pier is a redundant pier and the City Corporation will seek its reinstatement **for river transport uses**. ~~as a flexible multiuse pier including uses such as freight, leisure craft, taxi boats or emergency service use~~. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.
- 13.1.40. ~~The City Corporation will require developments adjacent to, on, or over the river to consider the use of the river for freight and servicing and for the transport of construction and waste materials.~~
- 13.1.41. **Given the limited opportunities to improve river transport within the City, as well as the potential impacts on views, heritage, ecology, biodiversity, archaeology, noise and other disturbance, and public enjoyment of the riverfront, permanent mooring of vessels will be resisted.**

#### **Policy VT5: Aviation Landing Facilities**

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- 13.1.42. Heliports will not be permitted in the City. **Individual helipads** ~~Helipads~~ will only be permitted where they are essential for emergency or security purposes.
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#### Reason for the policy

- 13.1.43. Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to

demonstrate a need for individual helipad facilities, # the helipad must be certified by the emergency services and it must be shown that the need cannot be met elsewhere.

13.1.44. The City Corporation's Transport Strategy sets out principles that will apply to the potential use of drones in the City. The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.

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## 13.2. Active Travel and Healthy Streets

### Context

The Mayor of London, through his Transport Strategy, aims to significantly change the function of London's streets to reduce the dominance and negative impacts of motor traffic and enable walking, cycling and social interaction. The Healthy Streets Approach provides the framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. These include ensuring people feel safe and creating street environments that enable people to choose walking, cycling and public transport instead of using the car. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.

The City's workforce is expected to increase significantly over the course of the Plan period to 2036, albeit that increased remote working means that actual footfall is unlikely to rise in proportion to total employment. Visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early evening. Figure 15 illustrates forecast pedestrian flows across the City in 2026 during the am peak. This forecast was produced before the Covid-19 pandemic and it is uncertain to what extent the pandemic may affect medium and longer term pedestrian movement in the City. The pandemic has, however, emphasised the importance of facilitating safe and convenient public transport services into and out of the City together with measures to ensure active travel and pedestrian comfort within the City's boundaries.

### Strategic Policy S10: Active Travel and Healthy Streets

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The City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces in ways that enhance inclusion and accessibility, put the needs of people walking and wheeling first when designing and managing our streets, and enable more people to choose to cycle in the City, to prioritise walking and cycling, improve accessibility and encourage more active modes of travel to, from and within the City by:

1. Applying the Healthy Streets Approach in development proposals and improvements to public realm;
  2. Improving conditions for safe, convenient, comfortable, **inclusive** and accessible walking, **wheeling** and cycling, incorporating climate change adaptation;
  3. Expanding the cycle network across the City with the aim of ensuring that **nearly** all property entrances are within 250m of the network;
  4. Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;
  5. Improving access routes and the public realm around stations, and between stations and key destinations; and
  6. Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of **disabled people**.
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## Reason for the policy

- 13.2.1. [The Healthy Streets Approach provides the framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.](#)
- 13.2.2. Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, with over 750,000 walked [and wheeled](#) journeys a day. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost ~~300%~~ [four-fold](#) between 1999 and ~~2017~~ [2022](#), although the rate of growth has slowed ~~markedly~~ since 2012. ~~People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during peak periods.~~ Pedestrian numbers have also risen in ~~recent the~~ [past 10](#) years as the City's workforce has grown. ~~In 2022, over a 24-hour count period across 30 sites, over 88,000 people were counted, a 2% increase from 2019 pre-pandemic levels.~~
- 13.2.3. Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. [The City has embedded the Healthy Streets Approach to inform strategic decision making and project prioritisation.](#) Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles. [New planning applications and public realm proposals will be assessed using the Healthy Streets Indicators to understand development impacts on surrounding streets and on people's experiences of the City's streets.](#)
- 13.2.4. The Mayor's Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking, [wheeling](#) and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk, [wheel](#) and cycle.

## How the policy works

- 13.2.5. Through the City Corporation's Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining [appropriate levels of vehicular](#) access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling, [wheeling](#) and walking, enhance the public realm and create new public space. [Healthy Streets Plans will be developed by the City Corporation to cover the following areas: City Cluster; Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank](#)



and Cheapside; and Riverside. Planning applications will be assessed against the Healthy Streets Indicators and developers will be required to use the Healthy Streets Check for Designers for all developments that have a significant impact on surrounding streets.

13.2.6. The first four Healthy Streets Plans will, to be developed by 2022, will cover the following areas:

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum of London. The area covered will align with the Smithfield and Barbican Key Area of Change.
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting changes to the Museum of London roundabout and St Paul's Gyratory.
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Cluster Key Area of Change and incorporate part of the Aldgate, Tower and Portsoken Key Area of Change.
- Temple and Fleet Street: in response to the Fleet Street Estate Project, which comprises the new Magistrates court and City of London Police headquarters, and enhancement of Fleet Street and the Temples area.
- An experimental safety scheme was introduced at Bank Junction in May 2017, which restricted traffic to buses and cycles only on weekdays between 7am and 7pm. Monitoring shows that this scheme achieved a significant reduction in casualties at the junction, while also reducing NO2 emissions in the area. Traffic restrictions at the junction have now been made permanent and a wider series of highways and public realm enhancements, known as All Change at Bank, will be implemented during the Plan period to transform the look and feel of this key junction at the heart of the City.

13.2.7. Adaptation to the anticipated climate change in the City should include pollution reduction and mitigation. The Healthy Streets Approach, the City's Transport Strategy and the City Corporation's Air Quality Strategy seek to deliver improvements in air quality and reductions in emissions and noise from transport. The City Corporation is working with partners to ensure that the City's streets and the public transport system are resilient to the long-term impacts of severe weather and climate change.

#### **Policy AT1: Pedestrian Movement, Permeability and Wayfinding**

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1. Developers should facilitate pedestrian movement, enhance permeability, and reduce severance by provision of suitable routes through and around new developments, wherever feasible. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:



- Providing legible, good quality, safe and low pollution pedestrian connections between spaces;
  - Providing new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;
  - Providing publicly accessible ground floors for improved pedestrian movement, where feasible;
  - Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.
2. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall. Development should not lead to the loss of routes and spaces that enhance the City's heritage, function or character.
  3. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths aligned with TfL Pedestrian Comfort guidance to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians.
  4. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
  5. The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  6. The shortest practicable routes between relevant points.
  7. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
  8. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable.
  9. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that ~~signage is not necessary, and~~ it is clear to the public that access is allowed (without reliance on signage).
  10. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.
  11. Improved wayfinding will be sought through new development and public realm improvements. Improvements sought will include:
    - Opportunities to update, enhance and add to the network of Legible London signs;
    - Consistent signage for public spaces created in new development; and

- Better revealing ‘hidden’ routes, courts, alleys and other spaces in ways that respect and celebrate their character and heritage.
12. Major development proposals should model the pedestrian flow impact of new development.

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Reason for this policy

- 13.2.8. In light of the current and predicted demands on the City’s streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes. ~~Policy DE4 sets out requirements for improved pedestrian permeability through buildings and development sites.~~
- 13.2.9. The City Corporation’s Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, increasing the number of pedestrianised or pedestrian priority streets from 25km to 35km by 2030 and 55km by 2044. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 13.2.10. The Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 16):
- ~~The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank Junction.~~
  - ~~Bank Junction and streets between the junction and the City Cluster.~~
  - ~~The route from the Millennium Bridge to Culture Mile, including changes to St Paul’s Gyratory.~~
  - ~~The route between the Barbican and the new Museum of London, including Beech Street and Long Lane (the ‘Culture Spine’).~~
  - ~~Fleet Street, including potential changes to Ludgate Circus (in partnership with TfL).~~
  - ~~The Bishopsgate corridor, including Monument junction (in partnership with TfL) The Globe View section of the Riverside Walkway.~~

Routes north-south from:

- Millennium Bridge to Barbican via St Pauls Cathedral, which supports the new Museum of London and Smithfield area changes.

- [Southwark Bridge to Barbican via Guildhall](#)
- [Cannon Street to Liverpool Street via Bank](#)
- [Blackfriars Bridge to Farringdon via Ludgate Circus \(in partnership with TfL\)](#)
- [London Bridge to Liverpool Street via Bishopsgate including Monument junction \(in partnership with TfL\); and](#)

**Routes east-west from:**

- [Farringdon to Aldgate via Smithfield and the Barbican](#)
- [Fleet Street to Aldgate via Bank and the City Cluster, including Ludgate Circus \(in partnership with TfL\).](#)
- [Temple to Tower Hill via the Thames Riverside](#)

13.2.11. The City's narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, wayfinding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City's users.

**How the policy works**

13.2.12. In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.

13.2.13. Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. [Minimum pavement widths should accord to TfL's Pedestrian Comfort guidance.](#) TfL's Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City Corporation's Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

13.2.14. Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition. [Financial contributions secured through s106 planning obligations will be used to ensure](#)

development contributes to improvements in the wider public realm. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

~~13.2.15. Where new pedestrian routes are created, or existing routes improved, the City Corporation will work with organisations such as the Active City Network and the Cheapside Business Alliance to provide information about routes to City workers, residents and visitors.~~

## **Policy AT2: Active Travel including Cycling**

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All major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle ~~and travel actively~~, by:

- o ensuring suitable access between the development site and pedestrian and cycle routes;
  - o incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards.
- 

### Reason for this policy

13.2.16. Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.

13.2.17. A growing number of people are choosing to cycle through and around the Square Mile. The popularity of cycle hire schemes has grown post-pandemic. Increased access to the East-West and North-South ~~Cycle Superhighways~~ Cycleways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 17). ~~Cycling improvements and interventions~~ TFL cycleways and will be prioritised on this network, with the aim of delivering the core cycling network by 2035.

13.2.18. Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans ~~and a review of existing Quietways, which run along less heavily trafficked back streets.~~ Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London's Transport Strategy, and that of the Mayor of London.

### How the policy works

13.2.19. New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces. The City of London's Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this. Accessible facilities for disabled cyclists should also be provided.

13.2.20. Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City's cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

### **Policy AT3: Cycle Parking**

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1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.
4. Cycling facilities should be conveniently located, easily accessible, safe and secure.
5. Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm.

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#### Reason for this policy

13.2.21. There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, reduce carbon emissions and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

#### How the policy works

13.2.22. Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. 5% of cycle parking spaces must be flexible in order to support secure storage and charging for e-bicycles, micromobility devices, and mobility scooters. A robust justification for

failure to comply with London Plan standards will be required. This will be considered on a case by case basis as part of pre-application discussions. All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.

- 13.2.23. Short-stay visitor cycle parking should be provided on-site at ground floor level. Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible. ~~Exceptionally, if this is not possible because of the layout and configuration of the site, 25% additional long stay cycle parking must be provided.~~
- 13.2.24. In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.
- 13.2.25. The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.
- 13.2.26. This policy applies to the cycle parking provided within new developments. The City Corporation's Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. **The Transport Strategy aims to ensure that operators of dockless cycle and scooter hire schemes require users to leave cycles and scooters in designated parking locations.** ~~The City Corporation will publish a Cycle Parking Delivery Plan, which will review the availability and distribution of public cycle parking on and off street to ensure it is sufficient to meet forecast demand.~~



# 14. Heritage and Tall buildings

## 14.1. Historic Environment

### Context

The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.

There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17<sup>th</sup> century home on Cloth Fair to Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 Scheduled Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides part of the backdrop and setting for the Tower of London World Heritage Site.

### Strategic Policy S11: Historic Environment

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The City's historic environment ~~City's heritage assets, their significance and settings~~ will be protected, celebrated and positively managed by:

1. Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets;
2. Conserving and enhancing heritage assets and their settings; ~~to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing~~ Opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness;
3. Seeking wider social, cultural, economic and environmental benefits by:
  - a) placing heritage at the heart of placemaking and delivering high quality buildings and spaces which enrich and enhance the settings of heritage assets;
  - b) encouraging the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement, including those on the Heritage at Risk Register;



(c) encouraging heritage-led regeneration by identifying opportunities to draw on the contribution made by the historic environment to the character and identity of the place;

(d) encouraging sensitive sustainable retrofit of designated as well as non-designated heritage assets and improvements that would benefit climate resilience and adaptation;

(e) encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address;

(e) Seeking ~~improved~~ ~~enhanced~~ public access and ~~enhanced experience~~ interpretation of the City's cultural and heritage assets, ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse in a way that is socially and economically inclusive;

4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations; and
  5. Preserving and seeking to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its ~~local~~ setting.
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#### Reason for the policy

- 14.1.1. The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.
- 14.1.2. There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17<sup>th</sup> century home on Cloth Fair, the unique early 18<sup>th</sup> century Bevis Marks Synagogue, and Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 Scheduled Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides part of the backdrop and setting for the Tower of London World Heritage Site.
- 14.1.3. The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains

below buildings and streets. The whole of the City is regarded as having archaeological potential.

14.1.4. The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.

~~14.1.5. The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of the City's listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space. The City has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, Bevis Marks Synagogue and an equally unique collection of over 60 churchyards embedded within a dense townscape.~~

14.1.6. Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as creative industries, and providing potential space for hotels and retail uses. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to, and experience of, the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

14.1.7. **The re-use, refurbishment and retrofitting of the City's historic building stock is important for mitigating climate change impacts and reducing carbon emissions. Heritage assets must adapt to meet changing needs and environments while preserving their heritage significance. The City Corporation will require development proposals to find sensitive retrofitting solutions to reduce carbon emissions; enhance climate resilience; and improve access and environmental performance of historic buildings. Retrofitting historic buildings will be supported where a sensitive and tailored approach to design and specification is taken, in line with the City Corporation's Heritage Buildings Retrofit Toolkit.**

#### How the policy works

14.1.8. **Applicants will be required to undertake a comprehensive heritage assessment proportionate to the scale of their site and heritage asset to understand ways in which their proposal could contribute towards the enhancement and enjoyment of the historic environment. This should include considering innovative approaches that extend beyond conventional conservation practices to promote wider social, cultural and environmental benefits associated with heritage conservation.**

~~14.1.9. The policy enables adaptations to be made to heritage assets where the alterations are consistent with the conservation and significance of those assets. The sensitive adaptation of heritage assets contributes to the continual growth of~~

the City's economy. This and continued investment will ensure that buildings retain an active use so that the City's buildings and heritage can be appreciated by present and future generations.

14.1.10. The City Corporation will encourage proposals to achieve the conservation and appropriate use of buildings and monuments on the Heritage at Risk Register to ensure their repair, long term wellbeing and where possible, avoid future deterioration.

14.1.11. In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage Site of Outstanding Universal Value (OUV).

### **Policy HE1: Managing Change to ~~heritage assets~~ the Historic Environment**

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Development proposals ~~which~~ that affect heritage assets or their settings should be supported by a Statement of Heritage Significance and a Heritage Impact Assessment, ~~to evaluate the significance of relevant heritage assets and their settings, to inform the proposals and maximise enhancements. It should be ensured any impacts of the proposals on the significance of heritage assets or their settings have been fully assessed and understood. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.~~

Proposals should meet the following criteria:

1. Development should preserve ~~conserve~~ and where possible enhance and better reveal the special architectural or historic interest and the significance of heritage assets and their settings;
2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss. Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset;
3. Change of use to heritage assets should be consistent with their long-term conservation and should help to retain and enhance the asset, particularly those which have been identified at risk;
4. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought.
5. ~~The demolition or loss of designated heritage assets will be refused, having regard to tests set out in national policy.~~

6. Where proposals would result in harm to, or the loss of, a non-designated heritage asset, the City Corporation will have regard to the scale of any harm or loss, the significance of the heritage asset and the wider public benefits proposed.
7. Development in conservation areas should preserve and where possible ~~or~~ enhance and better reveal the character, ~~or~~ appearance and significance of the conservation area and its setting. The ~~loss of~~ buildings and features elements which that contribute to the character, appearance, setting or significance of a conservation area ~~will be resisted~~ should be conserved and opportunities to enhance conservation areas should be considered;
- ~~8. Development should not adversely affect Historic Parks and Gardens~~ preserve and where possible enhance and better reveal the significance, character and appearance of the City's registered historic parks, gardens and open spaces and should protect their settings and views from and towards these spaces, included on the Historic England Register and historic open spaces;
9. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should preserve and where possible enhance the elements of setting that contribute to the significance of these heritage assets;
10. Development should encourage the appreciation of the City's historic roofscapes and should not impact the setting of an asset from high-level locations.

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Reason for the policy

- 14.1.12. The City of London's historic environment is of one its greatest assets. The special character that the City derives in large part is from the concentration and significance of its heritage assets, many of which are nationally and internationally renowned. Given their immense contribution to the character, economy and quality of life of the City, it is important that change to the historic environment is sensitively and carefully managed in ways appropriate to its significance and that makes it an integral part of the surrounding context.
- 14.1.13. The City Corporation has identified 'immediate setting' areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance.
- 14.1.14. It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature

and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.

- 14.1.15. National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 14.1.16. Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear understanding of the building, structure, open space or archaeological remains, including group value.
- 14.1.17. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.
- 14.1.18. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 14.1.19. Many buildings in conservation areas, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.
- 14.1.20. Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.
- 14.1.21. Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building does not harm its



significance. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.

- 14.1.22. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations is a material consideration.
- 14.1.23. Development proposals that affect the City's historic parks and gardens will be assessed to ensure that overshadowing does not cause undue harm, that their historic character is maintained, and that the setting, enjoyment, and views into and from these gardens are respected. Development should not detract from the layout, design, character, appearance or setting of the park or garden or prejudice its future restoration.
- 14.1.24. The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have been lost to the detriment of the City's historic townscape. Where possible, the City Corporation will seek to re-open or reintroduce such routes when the opportunity arises.

#### How the policy works

- 14.1.25. Applicants should provide a clear and comprehensive understanding of the heritage significance of a building including any contribution made by their setting. The level of detail should be proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.
- 14.1.26. National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial, it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 14.1.27. Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having

regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear understanding of the building, structure, open space or archaeological remains, including group value.

- 14.1.28. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting. Applicants should consider the significance and special character of conservation areas, informed by the Character Summary and Management Strategy Supplementary Planning Documents.
- 14.1.29. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 14.1.30. Many buildings in conservation areas, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.
- 14.1.31. Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.
- 14.1.32. Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building does not harm its significance. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.
- 14.1.33. ~~The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public~~



appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations a material consideration.

- 14.1.34. The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have been lost to the detriment of the City's historic townscape. Where possible, the City Corporation will seek to re-open or reintroduce such routes when the opportunity arises.
- 14.1.35. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 14.1.36. Developers Applicants will be required to provide supporting information describing the significance of any heritage assets where fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets. Applicants should refer to guidance by Historic England Good Practice Advice Note in Planning 3: The Setting of Heritage Assets.
- 14.1.37. The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these heritage assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into 9 character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in these areas, highlighting the key aspects that contribute to their significance. Applicants should draw reference to the Character Areas Study to understand their site's significance and the key attributes of significance that they should consider.
- ~~14.1.38. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk~~

~~and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.~~

## Policy HE2: Ancient Monuments and Archaeology

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1. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, inclusive access to, public display and interpretation where appropriate.
2. Development proposals which involve excavation or **ground** works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.
3. Significant, substantive archaeological features on major development sites must be preserved in-situ and, where feasible, exposed to public view. Significant archaeological artefacts on major development sites must be retained and exhibited on site. Where it can be demonstrated that found archaeological features or artefacts are of lesser significance or substance, proper investigation and recording of archaeological remains will be required as an integral part of a development programme, including timely publication and archiving of results to advance understanding.

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### Reason for the policy

- 14.1.39. The archaeological potential of the City is of national and international significance and continues to shed new light on the Roman world in Britain, as well as considerable detail of life in later periods. Although there has been considerable redevelopment and excavation within the City, there remains much potential for the City's archaeology to reveal information about and deep understanding of period in its history spanning two thousand years. Some of the archaeology is still visible – such as the remains of the Roman and medieval City wall exposed above ground or revealed in development sites, or the remains of the amphitheatre below the Guildhall.
- 14.1.40. The City's rich archaeological heritage has a major role to play in the Destination City programme and a strong contribution to make to the City's cultural offer. Accordingly, the City will, whilst adhering to the highest standards of scholarly research, investigation and recording, proactively seek opportunities to reveal and celebrate this archaeological heritage.
- ~~14.1.41. The entire City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. The City Corporation will indicate the potential of a site, its significance and relative importance and~~

~~the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.~~

#### How the policy works

- 14.1.42. The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.
- 14.1.43. Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and to inform consideration of the development proposals by the City Corporation.
- 14.1.44. In some cases, a development may reveal archaeological features or artefacts a monument or archaeological remains which ~~will~~ could either be displayed on the site, or reburied. Their treatment would depend on their level of significance and their substantiveness.
- 14.1.45. ~~On sites where significant monuments or archaeological remains exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future.~~
- 14.1.46. Undesignated archaeological ~~remains~~ features equivalent in significance and substance to a scheduled ancient monument will be treated accordingly following consultation with Historic England given equal weight to designated heritage assets.
- 14.1.47. On sites where significant, substantial archaeological features exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future.
- 14.1.48. The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of development proposals and agreement. ~~Agreement~~ will be sought, where appropriate, to achieve public access. Successful exemplars of this are the Roman Wall exhibition at Vine Street, or the Temple of Mithras at Bloomberg.
- 14.1.49. On sites where significant archaeological artefacts are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public. This would be undertaken following the conclusion of any programme of research and study.

14.1.50. ~~The City Corporation will refuse schemes which do not~~ **Development proposals should** provide an adequate assessment of a site, **and** make any provision for the incorporation, safeguarding or preservation of significant ~~monuments~~ **features** or remains, or which would harm or adversely affect those ~~monuments~~ **features** or remains. Where display of ~~a monument~~ **features** or of archaeological remains would harm the heritage asset or make it vulnerable and reburial is necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.

14.1.51. A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be conditioned and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

### **Policy HE3: Setting of the Tower of London World Heritage Site**

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1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site. **Applicants will be required to submit a Heritage Impact Assessment along with the planning application.**
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and connectivity.
3. **Development proposals in the vicinity of the Tower of London World Heritage Site will be encouraged to enhance pedestrian and cycle routes, including signage and wayfinding in the area that is appropriate and contributes to the importance of setting of the Tower by improving its public accessibility and visibility.**

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#### Reason for the policy

~~14.1.52.~~ The Tower of London is a UNESCO World Heritage Site of Outstanding Universal Value. While the Tower itself is within the London Borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to safety and accessibility for **people walking and cycling** ~~non-~~

~~motorised road users. Developments within a wider area may affect the setting of the Tower, depending on their scale, form and location.~~

#### How the policy works

- 14.1.53. Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.
- 14.1.54. The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its OUV, while accommodating change. The International Council on Monuments and Sites (ICOMOS) publication 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' offers guidance on the process of commissioning Heritage Impact Assessments (HIAs) for World Heritage properties and also outlines the methodology to be used in order to evaluate the impact of potential development on the OUV of properties.
- 14.1.55. The Character Areas Study contains a Statement of Heritage Significance for the Tower of London outlining the key attributes that contribute to the OUV of the Tower of London and its setting which should be protected, enhanced or better revealed. Applicants should refer to the Statement of Heritage Significance to fully understand the significance of the Tower of London and its setting.
- 14.1.56. The City Corporation is also undertaking a Heritage Impact Assessment to assess the potential impacts of the tall building areas on the OUV of the Tower of London WHS.

## **14.2. Tall buildings**

### **Strategic Policy S12: Tall Buildings**

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#### Definition

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD).

#### Location and heights

2. The tall building areas identified on the Policies Map and Figure XX are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies.
3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and

Figure XX. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.

4. The height and form of tall buildings must take account of strategic and local views.
5. The suitability of sites for tall buildings within the identified areas and their design, height, scale and massing should take into consideration local heritage assets and other localised factors relating to townscape character and microclimate.
6. Applicants will be required to submit accurate three-dimensional computer models to support the analysis of their proposals. Accurate Visual Representations (AVRs) should be submitted as part of the application.
7. Applicants will be required to ensure that any cross-boundary impacts of proposed schemes are fully addressed.

### Impacts

8. Tall buildings ~~of world class architecture and sustainable and accessible design will be encouraged on suitable sites, having~~ must have regard to:
  - the potential effect on the City skyline, the wider London skyline and historic skyline features;
  - the character and amenity of their surroundings, including the relationship with existing and consented tall buildings;
  - the significance of heritage assets and their immediate and wider settings;
  - ~~the provision of a high quality public realm at street level; and~~
  - the environmental impact ~~the tall building may have~~ on the surrounding ~~area including~~ buildings and public realm, including daylight and sunlight, solar glare, solar convergence, overshadowing and wind shear, and the capacity of the City's streets and spaces to accommodate the development. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants;
  - ~~Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building.~~ The potential impact on telecommunications operations. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible; ~~Consideration should be~~



~~given to how the design of tall buildings can assist with the dispersal of air pollutants;~~

9. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.

## Design and public access

### 4. The design of tall buildings must:

- achieve exemplar standard of architectural quality and sustainable and accessible building design;
- enhance the City skyline and views;
- provide adequate levels of daylight and sunlight within the new development;
- make a positive contribution to the townscape character;
- make a positive contribution to the quality of public realm, incorporate active frontages at ground floor and create a positive pedestrian experience;
- maintain adequate distance between buildings to ensure high quality experience at the street level;
- ~~New tall buildings will be required to~~ enhance permeability ~~and provide by~~ providing the maximum feasible amount of publicly accessible open space ~~or other facilities at street level;~~
- incorporate publicly accessible open space within the building and its curtilage, including ~~at upper levels available at no charge~~ free to enter, publicly accessible elevated spaces at upper levels, which may include culture, retail, leisure or education facilities, open spaces including roof gardens or public viewing galleries;
- provide consolidation of servicing and deliveries to reduce potential vehicle movements;
- mitigate adverse impacts on the microclimate and amenity of the site and surrounding area and avoid the creation of building canyons; and
- demonstrate consideration of public safety requirements as part of the overall design.

~~10. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.~~



## Reason for the policy

- ~~14.2.1. The City contains many tall buildings, which help to enhance its environment and economy and contribute to London's world city role. While tall buildings are a characteristic and iconic element of the City's skyline, they must not adversely impact on the City's unique environment or built heritage. All of the City is sensitive to the development of tall buildings within and outside the City. Areas outside of the City may also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered. Policy HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site.~~
- ~~14.2.2. Tall buildings are defined as those exceeding 75m AOD in height. Figure 19: Tall buildings distribution in the City of London September 2019 shows their current distribution. The City Corporation is required to refer applications to the Mayor for buildings that exceed 150m above ground height across the City and 25m above ground height in the Thames Policy Area. The intention of this lower threshold is to preserve the open aspect of the river and the riverside public realm. Tall buildings in the City may have impacts on locations within adjacent boroughs. Developers should ensure that any cross-boundary impacts are fully addressed.~~
- 14.2.3. London Plan Policy D9 (Tall Buildings) requires Development Plans to define what is considered to be a tall building and determine if there are locations where tall buildings may be an appropriate form of development, identifying locations and appropriate tall building heights. Guidance issued by the Design Council/CABE and Historic England also encourages local planning authorities to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate.
- 14.2.4. Tall buildings in the City are defined as those exceeding 75m AOD in height. The City Corporation's Ordnance Survey data on building heights indicates much of the City is between 50-75m above Ordnance Datum (AOD), or between 15-21 storeys; and only small pockets of the City have building heights at or around 6 storeys or 18m high. These areas include relatively small parts of Smithfield, Fleet Street and the Temples or along the lanes and alleys off Bank junction, which mostly comprise conservation areas. The City has a varied character with a striking spatial contrast. Given its small geographical area, it is not considered appropriate to prescribe a granular approach to a definition of tall buildings, but instead to have a single definition for tall buildings across the area. A definition of 75m isensures consistency with our longer-term strategic approach and – given prevailing heights across much of the City – is a level where buildings may have significant visual implications and could result in a significant change to the skyline.
- 14.2.5. The City contains many tall buildings. In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings

impart the City of London's World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan.

- 14.2.6. Tall building development can have transformational impacts upon a place and they should be located in sustainable locations where they don't undermine the character of a place, or intrude into, and undermine cherished views of landmarks or urban skylines. They can also cause adverse environmental impacts such as reduction in daylight and sunlight, wind shear and overshadowing. It is therefore critical to determine appropriate areas and heights for tall buildings in order to respond to the opportunities that tall buildings may provide whilst also addressing and responding appropriately to the issues that they may create.
- 14.2.7. ~~The London Plan indicates that areas should be identified where new tall buildings will be an appropriate form of development in principle. All of the City of London is sensitive to development of tall buildings and the City Cluster represents the most appropriate area for encouraging tall buildings in the City.~~
- 14.2.8. The tall building areas identified are the City Cluster and Fleet Valley areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, tall buildings would be likely to have very significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.
- 14.2.9. Different parts of the City have different characteristic features that make them distinct from each other. New development should be designed to fit in well within the existing context and have form, massing and height that positively responds to the townscape character.
- 14.2.10. The heights of the buildings in the City Cluster and Fleet Valley areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and

pan-London skyline. Both areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.

14.2.11. Tall buildings are a characteristic and iconic feature of the City's skyline. Well-designed tall buildings can respond positively to the character and the historic environment of the area. The creation of coherent clusters of tall buildings will help to ensure individual tall buildings are not isolated features but part of a recognisable skyline, with viewers able to identify the clusters spatially and distinguish them visually from important skyline features such as St Paul's Cathedral.

14.2.12. The way tall buildings are experienced at ground level is an important consideration as tall buildings can have a significant impact on the streetscape and public realm. They can provide a range of activities and public spaces at ground level for people to walk and spend time. They can also benefit communities by providing publicly accessible viewing terraces and galleries.

#### How the policy works

14.2.13. ~~This~~ The identification of the two tall building areas does not mean that all sites in the two areas cluster are suitable. All new tall building proposals will need to satisfy the requirements of policy S12 and other policies in this Plan and the London Plan. Policy S21 provides more details about the considerations that apply specifically to new tall building proposals in the City Cluster.

14.2.14. ~~Outside of the City Cluster, there is less scope for new tall buildings due principally to conservation area and views protection considerations. Figure 21: Areas inappropriate for new tall buildings identifies these areas of the City that are considered inappropriate for new tall buildings due to these policies, based on a composite of the various policy designations illustrated in Figure 20.~~

14.2.15. Tall buildings are high-profile developments with a wider impact, visible on the skyline across large parts of London. They provide City landmarks and should be designed to enhance the City's skyline.

14.2.16. London Plan policy D9 B requires appropriate locations and appropriate tall building heights to be identified on maps in Development Plans. Figure 14 and Policies Maps C and D identify the areas where tall buildings may be appropriate in the Square Mile. Within these areas, Figure 15 and Policies Maps C and D identify contour rings. These contour rings set out the maximum tall building heights at specific points within the area. These maximum heights are those that the City Corporation considers to be the appropriate tall building heights based on an assessment of the potential impacts on strategic views and the following heritage assets: St Paul's Cathedral, The Monument and the Tower of London World Heritage Site. In areas between the contour rings, tall building heights should be designed to

successfully mediate between them. Where two contour rings overlap, Policies Map C identifies two heights. The lower height should be applied to the development that sits outside the contour ring; the higher height should be applied to the development that sits inside the contour ring. In addition, part 8 of the policy requires the height and form of tall buildings to take into account strategic and local views; protected views are also addressed in Strategic Policy S13.

- 14.2.17. All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyline.
- 14.2.18. Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings. The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on heritage assets, while recognising the juxtaposition of old and new architecture that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.
- 14.2.19. Tall buildings must not adversely impact on the operation of London's airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority's (CAA's) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA, Heathrow and London City Airports regarding building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.
- 14.2.20. The development of tall buildings must take account of City Corporation Planning Advice Notes [and SPDs](#) on the potential microclimate and thermal comfort impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar convergence, sunlight, wind and thermal comfort explaining how they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.
- 14.2.21. Three dimensional computer models should be accompanied by data to verify the format, units of measurement and accurate positioning information

relative to OSGB / Ordnance Datum co-ordinates. Submitted Accurate Visual Representations (AVRs) should be consistent with the supplied computer model but may reflect additional information to explain the physical appearance of the proposals. They should comply with the methodology and definitions included in Appendix C of the London View Management Framework (LVMF). AVR materials should include representations of existing tall buildings and relevant consented schemes.

~~14.2.22. Proposals for new tall buildings should take account of the cumulative impact of other proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.~~

~~14.2.23. Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. They should contain permeable ground floors which provide an active frontage, such as retail facilities. Tall buildings should provide free to enter, publicly accessible areas, which may include retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries. There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London.~~

~~14.2.24. The City Corporation will use 3D digital modelling technology to visually assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyline. This assessment will support detailed consideration of development proposals against the policies in this Plan. Developers should submit virtual models of their development in an open source or other format compatible with the City Corporation's 3D digital model to enable this assessment.~~

### 14.3. Protected Views

#### Strategic Policy S13: Protected Views

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The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

1. Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views;
2. Protecting and enhancing significant local views of St. Paul's Cathedral, through the City Corporation's St. Paul's Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and

backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features;

3. Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016); and
4. Having regard to views of the City that have been designated by other Local Planning Authorities.

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#### Reason for the policy

- 14.3.1. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The successful protection and restoration of the views depends on the long-term application of the Heights limitations to all sites within the area of control. The views protected by the Heights are sensitive to even small infringements. Consistent application of the limitations is therefore crucial to their successful protection of the views.
- 14.3.2. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.
- 14.3.3. The approach to views protection in this Plan ~~is a clarification of the long-standing policy, rather than seeking changes to policy. It~~ is supported by more detailed guidance in the Protected Views SPD.

#### How the policy works

- 14.3.4. Protected vistas are defined geometrically from an assessment point at the view location to the strategically important landmark that is the focus of the protected vista. Each protected vista includes a landmark viewing corridor, within which development should not exceed the height of the threshold plane. Beside and behind landmark viewing corridors are the wider setting consultation areas, within which development that exceeds the defined LVMF threshold plane should not compromise the viewer's ability to recognise and appreciate the strategically important landmark.
- 14.3.5. Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are river prospects from Thames bridges and the riverside walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including



detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.

- 14.3.6. The LVMF defines a protected vista and a White Tower protected silhouette for the Tower of London. Any development in the wider setting consultation area in the background of this protected vista and the white tower protected silhouette should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, proposed new development in the City which exceeds the defined LVMF threshold plane for this view will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.
- 14.3.7. The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.

#### Operation of the Heights

- 14.3.8. The City Corporation has successfully protected views of St. Paul's Cathedral through the St. Paul's Heights policy for over 70 years. Applicants will be expected to submit drawings showing the relationship between the Heights limitations and the proposed development to ensure compliance with the Heights.
- 14.3.9. Some existing buildings exceed the Heights limitations and thereby partially obstruct the protected views of St Paul's. Upon alteration or redevelopment such buildings will be required to comply with the Heights limitations so that views obstructed at present will eventually be restored. Several infringing buildings have been redeveloped in compliance with the Heights, successfully restoring lost views.
- 14.3.10. Strict observance of the Heights limitations can sometimes lead to a uniform roofscape. Developers are encouraged to provide design solutions to help promote a more articulated, interesting roofscape within the area of the St. Paul's Heights limitations while also keeping to the limitations imposed by the St. Paul's Heights grid.

#### Backdrop and Skyline Setting of the Cathedral

In some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or cluster close to the



Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views. From other Heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation.

14.3.11. In views from the south bank west of Blackfriars Bridge and from Waterloo Bridge the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and should be maintained.

~~14.3.12. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street, Ludgate Circus and Ludgate Hill which forms part of the long established royal and state processional route between Westminster and the City. The views of St Paul's are kinetic, changing as the viewer moves along the length of this route, depending on the topography and alignment of buildings. Development proposals that could be visible from places along this route should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure XX to highlight this issue. Further details will be set out in an update to the Protected Views SPD, which will include a Statement of Significance and 3D digital modelling information to inform the future conservation and enhancement of this approach.~~

14.3.13. New development proposals should be well designed in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE, Historic England and the Greater London Authority.

14.3.14. The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.

14.3.15. The City Corporation will supplement its assessment of strategic and locally protected views with a visual assessment carried out using 3D digital modelling technology. Developers should submit virtual models for all major development in an open source or other format compatible with the City Corporation's 3D digital model.

**St Paul's Preservation Act and the St. Paul's Depths**

14.3.16. **The City of London (St Paul's Cathedral Preservation) Act 1935 defines an area near St Paul's where development below prescribed depths is controlled in order to protect the stability of the Cathedral.**

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# 15. Open Spaces and Green infrastructure

## 15.1. Open Spaces and Green Infrastructure

### Context

The City of London is a dense urban environment containing many small open spaces and pocket parks. These spaces are vital to the City, offering residents, workers and visitors outside spaces in which to work or to relax and appreciate the streetscape. There is a growing recognition that green infrastructure helps to mitigate some effects of climate change, provides benefits for wellbeing and mental health and improves air quality. These same small green spaces are essential for wildlife found in this urban setting. The policy seeks to provide further green infrastructure, open space provision and biodiversity within the City.

### Strategic Policy S14: Open Spaces and Green Infrastructure

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The City Corporation will work in partnership with developers, landowners, the churches and other agencies to promote a greener City by:

1. Protecting existing open and green space;
2. Seeking the provision of new open and green space through development, public realm or transportation improvements;
3. Increasing public access to existing and new open spaces;
4. Creating, maintaining and encouraging high quality green infrastructure;
5. Using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
6. Promoting the greening of the City through new development opportunities and refurbishments; and
7. Ensuring new development and refurbishment protect and enhance the City's biodiversity.
8. **Ensuring that the provision of new and enhanced open space, biodiversity and urban greening takes account of and contributes toward the green corridors identified in Figure XX and the City Corporation's Biodiversity Action Plan.**

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### Reason for the policy

- 15.1.1. The City is densely built up and most of its open space provision consists of small spaces at street level. **Open spaces are vital to the City, offering residents, workers and visitors outside spaces in which to spend time, relax,**

and encounter nature, and play a crucial role in providing opportunities for play, exercise and recreation, and social interaction. Open spaces are also inclusive, providing free access for everyone. They are important havens for wildlife and enrich the City's biodiversity, and help to mitigate the effects of climate change, improve air quality and benefit wellbeing, and physical and mental health. Green infrastructure in the City includes civic spaces, parks and gardens, trees and planting, churchyards, burial grounds, green roofs and walls in addition to amenity spaces. ~~A key environmental asset is the River Thames.~~

- 15.1.2. The City's growing workforce and increasing visitor numbers, and the limited amount of open space in the Square Mile, mean that there is a need to provide more open spaces, and to improve and protect those that exist. Some areas of the City have deficiencies of open space or access to nature, or are places (such as the riverside) where additional open space and greening has an important role to play in realising the potential of the area and helping to create a more vibrant and welcoming City. ~~Open and green space is under increasing pressure due to the intensification of development, an expanding workforce and growing visitor numbers projected over the Plan period. It is important that access to these spaces is protected and expanded as they provide multiple positive impacts on physical health and mental wellbeing, including providing opportunities for exercise, to reduce stress levels, and to facilitate social interaction.~~
- 15.1.3. ~~The City of London Corporation is committed to protecting existing open spaces and expanding the provision of green infrastructure as far as possible consistent with heritage significance. The City Corporation seeks further urban greening to make the Square Mile more attractive to workers, residents and visitors. This would contribute to the Mayor of London's ambition to make over 50 per cent of London green by 2050 and support London's designation in 2019 as the world's first National Park City.~~
- 15.1.4. Greening the City is an important step in ensuring the City is resilient to the effects of climate change. It can assist in creating cooler spaces, mitigating the urban heat island effect, and provide shade. Greening can improve biodiversity, improve air quality, and create a more attractive environment. Given the dense nature of the Square Mile and the demand for additional capacity, it is crucial that development provides greening and improves biodiversity on site and contributes as appropriate to wider improvements to green infrastructure. ~~Given that space is at a premium in the City, all new developments and refurbishments will be required to include a greening element to the building and/or the public realm where consistent with good design and area character. This approach will have many benefits over time such as improving the urban environment for biodiversity, reducing rainwater run-off, reducing air and noise pollution, regulating temperature, and making the City a more desirable business location by improving visual amenity. Public access to greening elements should be achieved wherever possible.~~

[How the policy works](#)

15.1.5. ~~The City of London Corporation will work with developers and landowners at all stages of the development process and actively monitor developments from pre-application stage through to post-completion to ensure that the highest standards of green infrastructure are achieved, and existing provision is improved.~~

## Open Spaces

### Policy OS1: Protection and provision of open spaces

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The quantity, quality and accessibility of public open space will be maintained and improved.

1. Existing open space will be protected and enhanced ~~particularly spaces of historic interest;~~  
~~Where a~~ **Any** loss of existing open space ~~is~~ should be wholly exceptional and is proposed it must be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site. The loss of historic open spaces will be resisted;
  2. Additional publicly accessible open space and pedestrian routes will be sought in major ~~commercial and residential~~ developments, ~~wherever practical but~~ particularly in and near to areas of open space deficiency, in areas such as the riverside where it is a key component of placemaking, and where pedestrian modelling shows significant pressure on City streets;
  3. Further public open spaces will be created from underused highways and ~~other land on development sites where feasible.~~ Wherever possible, existing private spaces will be secured as publicly accessible open spaces as part of development;
  4. ~~Public access will be secured, wherever possible, to existing and proposed private spaces;~~
  5. Improvements to the accessibility, inclusion, design, greening, lighting and biodiversity of existing open spaces will be promoted and, where relevant, secured through development ~~Access to new and existing open spaces will be improved;~~ and
  6. Open spaces must be designed to meet the ~~needs~~ requirements of all the City's communities. They should be free, accessible, welcoming and inclusive. The design of open spaces should consider their context and how their use could contribute positively to the life of the Square Mile. This should include consideration of how seating, planting, lighting, and routes are designed and located; the potential for water features and noise attenuation; and opportunities for play, sport, recreation and leisure, taking into account likely users of the space.
  7. The provision of public drinking fountains in open spaces will be encouraged.
-

## Reason for the policy

- 15.1.6. The City of London has 376 open spaces totalling just under ~~34~~ **35** hectares in March 2022, which includes parks, gardens, churchyards and hard open spaces such as plazas and ~~improvements to the~~ repurposed highway. Most of the open spaces are small, with approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquillity, ~~agile working~~, leisure and sport, and to increase biodiversity. The provision of open space in the City is uneven, with some areas of deficiency in access to public open space. Sites within and near to these areas will need to play a role in improving access to open space.
- 15.1.7. As the City changes, there is a need for open spaces to play an increased role in supporting the life of the City. Open spaces provide a unique setting for people to spend time in free and accessible spaces, where they can pursue a variety of activities or simply enjoy being outdoors. Some parts of the City would benefit substantially from increased and improved open space provision. The Thames riverside has significant potential as an inclusive leisure destination but includes a Riverside Walk that is narrow in places and lacks significant open areas where people can spend time and enjoy the river. Areas where there are due to be significant new attractions – such as Smithfield – that are likely to attract visitors including children and young people will require open spaces that can cater to their specific requirements. Other places, such as the City Cluster, where there are deficiencies in open spaces and high density development, will need to ensure that existing ground level open space works hard and is of an exemplary standard of design, that new spaces at ground level are created where possible, and that this is supplemented this through the addition of publicly accessible roof gardens and other spaces (see policy XX). Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area has a lower proportion of open space (see Figure 15).

## How the policy works

- ~~15.1.8. Many open spaces in the City are of historic value, such as churchyards, while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. Policy DE3 sets out standards for public realm improvements. These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs.~~
- ~~15.1.9. The provision of open space across the City is uneven. The northern area of the City contains just over half of all the open space in the City, due to the relatively large amounts of space in the Barbican and Golden Lane estates and the Broadgate commercial estate. There is significant open space along~~



~~the Thames and the riverside, with the Riverside Walk, the Temples legal precinct and space close to the Tower of London. A new area of public realm will be created at Blackfriars foreshore as a result of the Thames Tideway Tunnel project. Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area and the City Cluster areas have the lowest proportions of open space and face pressure from the increasing employment and pedestrian numbers associated with commercial intensification (see Figure 15). Additional open space is especially important in these areas, both at street level and at higher levels through the provision of accessible roof gardens/terraces.~~

~~15.1.10. There is intense pressure on all the City's open spaces particularly at lunchtimes and new development provides opportunities to create additional open space in and around buildings. These spaces should be designed for multiple uses, be maintained to a high standard and be resilient to future climate conditions.~~

## **Policy OS2: [City Urban Greening](#)**

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1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.
  - All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context;
  - The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought, where appropriate, and new development should not compromise these elements on existing buildings located nearby; and
  - The loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances.
2. Major development proposals will be required to:
  - Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City's target UGF score of 0.3 as a minimum; and
  - Submit an operation and maintenance plan to demonstrate that the green features will **be maintained and** remain successful throughout the life of the building.

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### Reason for the policy

15.1.11. Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity enhancement, recreation, and health and wellbeing of the City's communities. [This Given the limited opportunities to provide additional large green spaces in the Square Mile, greening the urban realm will be important if these benefits are to be realised.](#) Greening will increase in importance as weather patterns continue to change with rising average temperatures, summer droughts and more intense rainfall events periodically



through the year. The inclusion of blue infrastructure such as rain gardens and rainwater harvesting can help to minimise water use.

- 15.1.12. Evidence demonstrates a positive correlation between urban greening and good mental and physical health. The provision of large green spaces in the City's high-density urban environment is difficult to achieve. Small areas of soft landscaping, green walls and green roofs, associated with buildings and the public realm, will play a vital role in promoting wellbeing. Increased access to green spaces will be sought.
- 15.1.13. The City Corporation has long championed green roofs and continues to actively encourage them, but other forms of greening are less common in and around new buildings. The City Corporation will seek the provision of trees and landscaping in all development where this is possible. Vertical greening such as green walls will be sought on buildings which do not provide for overnight sleeping accommodation. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they require careful design, installation and regular maintenance.
- 15.1.14. Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.
- 15.1.15. There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones (including BioSolar green roofs) having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers seek to install intensive green roofs with deep substrates for amenity space, these are expected to be of high-quality design incorporating rainwater harvesting for irrigation to minimise water use.
- 15.1.16. The green roof should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately for the life of the building to maximise the roof's environmental benefits including biodiversity, rain-water run-off attenuation and building insulation.
- 15.1.17. This policy promotes greening for all new buildings and public realm schemes. It takes account of the value of different types of greening through the application of an Urban Greening Factor (UGF), with a higher UGF for greening that provides multiple benefits.
- 15.1.18. The London Plan has introduced a UGF scoring system for London, which will operate as a tool to assess the amount, type and value of greenery within development proposals. The London Plan recommends interim target scores,

~~pending work by individual boroughs and the City Corporation to develop their own approaches tailored to local circumstances.~~ [Further information on applying and calculating the UGF is set out in Urban Greening Factor, London Plan Guidance \(February 2023\).](#)

15.1.19. The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City. The Study considered the potential for an UGF on a range of development types, including offices, residential, hotels and mixed commercial. Policy OS2 requires major development proposals in the City (commercial and residential) to include an UGF calculation demonstrating how it will meet the minimum UGF target of 0.3.

#### How the policy works

15.1.20. The City Corporation has long championed green roofs and continues to actively encourage them, ~~but other forms of greening are less common in and around new buildings.~~ The City Corporation will seek the provision of trees and landscaping in all development where this is possible. ~~Vertical greening such as green walls will be sought on buildings which do not provide for overnight sleeping accommodation. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they can take many forms and~~ require careful design, installation and regular maintenance.

15.1.21. Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.

15.1.22. There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones (including BioSolar green roofs) having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers seek to install intensive green roofs with deep substrates for amenity space, these are expected to be of high-quality design incorporating rainwater harvesting for irrigation to minimise water use.

15.1.23. The green roof should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately for the life of the building to maximise the roof's environmental benefits including biodiversity, rain-water run-off attenuation and building insulation. [The choice of plant species for green roofs should be consistent with the Biodiversity Action Plan \(BAP\) and Climate Resilience Strategy and development proposals should aim to promote diverse planting including \(where practical\) forage for target pollinator species.](#)

- 15.1.24. ~~Developers will need to provide evidence to justify why the UGF target cannot be met. The City Corporation will take a flexible approach where delivery of the target UGF would detract from the heritage significance of a building or conservation area.~~
- 15.1.25. Development proposals could include greening of roofs, facades, terraces and balconies, both internal and external, and/or landscaping **and tree planting** around the building depending on the circumstances of each site. The UGF assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development. **Urban greening should be considered at an appropriate stage in the design of the scheme, and scores should not be reduced as conditions are discharged. Internal greening which is fully enclosed does not contribute towards the UGF target score.**
- 15.1.26. ~~More details including a worked example of a UGF calculation are set out in Appendix 1 of the Local Plan.~~

## Biodiversity

### Policy OS3: Biodiversity

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Development should ~~aim to secure net gains for biodiversity where possible by incorporating~~ **incorporate** measures to enhance biodiversity, including:

1. Retention, **protection** and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
2. Measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats **and action plans**;
3. Green roofs **and walls**, gardens and terraces, soft landscaping and trees **and green walls where appropriate**;
4. **Helping to create** green corridors and biodiversity links **and utilising roof terraces and gardens as stepping stones to contribute towards a green network**;
5. Wildlife-friendly features, such as nesting or roosting boxes and **nesting opportunities for wild bees and other pollinators** ~~beehives~~;
6. A planting mix ~~and variation in vegetation types to encourage biodiversity~~ **with a variety of vegetation types including flower-rich perennial planting to encourage biodiversity, supporting pollinators and other invertebrate groups**;
7. Planting which will be resilient to a range of climate conditions, with a high proportion of native plants **and the provision of year-round forage for pollinators**;

8. A lighting scheme designed to minimise impacts on biodiversity.
- 

#### Reason for the policy

- 15.1.27. Protecting and improving biodiversity involves enhancing wildlife populations and their habitats. This has positive impacts for the environment, the economic and social life of the City and the aesthetics of the streetscape. Healthy biodiversity should be viewed as a sign of a healthy environment and healthy city.
- 15.1.28. ~~The City has 13 Sites of Importance for Nature Conservation (SINCs), including three new SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were agreed following a review in 2016. Two existing SINCs were agreed to be upgraded as part of this review: Barbican and St Alphage Garden, which includes the Barbican Wildlife Garden and the Beech Gardens, was upgraded from Grade 2 to Grade 1 Site of Borough Importance for Nature Conservation (SBINC); and Roman Wall, Noble Street, which was extended southwards to include St Anne and St Agnes Churchyard and was upgraded from a Local SINC to a Grade 2 SBINC. These new and upgraded SINCs will formally take effect upon adoption of this Plan.~~
- 15.1.29. A number of areas along the riverside, west of Farringdon Street and east of Bishopsgate have been identified as Areas of Deficiency in Access to Nature (SINC AoD) by [Greenspace Information for Greater London \(GiGL\) London's environmental records centre](#) and the [Mayor of London GLA](#). **SINC AoDs are defined as built-up areas more than 1km walking distance from accessible Sites of Importance for Nature Conservation (SINCs). The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species. However this SMINC has limited access to nature so does not alleviate AoD in the City.** It is important that opportunities are taken to improve biodiversity throughout the City, and particularly in areas where this would improve green corridors or biodiversity links, such as along the riverside. ~~The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species.~~

#### How the policy works

- 15.1.30. Measures to enhance biodiversity should provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles) and by extension a wider range of insects and birds. The City of London BAP provides further details about the target species, ~~and~~ their **target** habitats and **action plans**. ~~The BAP will be kept under regular review. The City has 13 SINCs, including three new SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were agreed following a review in 2016. Two existing SINCs were agreed to be upgraded as part of this review: Barbican and St Alphage's Garden, which includes the Barbican Wildlife Garden and the Beech Gardens, was upgraded from Grade 2 to Grade 1 Site of Borough Importance for Nature Conservation (SBINC);~~

and Roman Wall, Noble Street, which was extended southwards to include St Anne and St Agnes Churchyard and was upgraded from a Local SINC to a Grade 2 SBINC. These new and upgraded SINC's will formally take effect upon adoption of this Plan.

- 15.1.31. New developments should seek to protect and enhance biodiversity and the City's environmental assets. This can be achieved by providing spaces for biodiversity to flourish through the retention and planting of trees and soft landscaping, along with green roofs and green walls where appropriate possible. A variety of these provisions in one development will create habitats for a range of different wildlife species. Native plant species or species that are of value to biodiversity including pollinators should be incorporated into any formal landscaping areas and other greening. Biodiverse pollinator friendly planting including fruiting and flowering perennials, shrubs and trees should be incorporated in planting mixes. Where possible incorporation of planting that can support invertebrate life cycles such as food and laying resource for butterflies and moths. Further information on pollinators and other target species is set out in the BAP.
- 15.1.32. Joined up green spaces and corridors which link SINC sites give species a better chance of survival in the urban landscape and greater resilience to future climate change. Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.
- 15.1.33. ~~These measures will assist in the delivery of the All London Green Grid (ALGG) to promote the design and delivery of green infrastructure across London.~~
- 15.1.34. The City's wildlife depends not only on greenery but also on the built environment. Buildings can provide roosting sites for bats and nesting opportunities for birds. Artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species. Biodiverse features of value to wildlife that support the City of London's BAP including target species and target habitats but are not included within the Department of Environment, Food and Rural Affairs (Defra) Biodiversity Metric (DBM) 4.0. These should be provided in suitable locations, in close proximity to green features, and should include but are not limited to bird boxes, bat boxes and wild bee nesting habitat (cavity and ground nesting) and invertebrate hotels. Target habitats should be provided in suitable locations, in close proximity to green features, and should include but are not limited to bird boxes, bat boxes and nesting habitat (cavity and ground nesting) for appropriate pollinators (including wild bees and bumblebees) and invertebrate hotels. This could include artificial interventions such as bee bricks, leaving areas of bare ground and creating mounds with the incorporation of sandy loam substrates.
- 15.1.35. Wild bees (bumblebees and solitary bees) are one of the target species identified in the BAP and the City is home to domesticised honey bees. There is an over proliferation of honey bees in the City and beehives aimed at



attracting or accommodating them should not be included in the design of development schemes. Honey bees in the City are a major risk to wild bees and other pollinators as their abundance and competition limits forage resources.

- 15.1.36. ~~Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.~~
- 15.1.37. Where development has a potential impact on designated sites of importance for biodiversity **in or near the boundary of the site**, the developer should submit an ~~ecological statement~~ **appropriate Ecological Assessment** outlining how any impacts will be avoided, minimised or mitigated. Where necessary, the City Corporation will seek independent review of an assessment, paid for by the developer.
- 15.1.38. As set out in the BAP, the City of London recognises the importance of biodiversity data collection to improve monitoring and informs decisions and identify future areas of priority in the City. Planning applications should include biodiversity data informed by an up-to-date search report by GiGL. Opportunities such as citizen science and school projects and records collected by local voluntary individuals and groups make a significant contribution in supporting biodiversity and raises the profile of species and habitats within the City. Many of these findings are reported directly to GiGL.
- 15.1.39. ~~Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. The Mayor of London will be producing guidance to set out how biodiversity net gain applies in London.~~

#### Policy OS4: Biodiversity Net Gain

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Major developments are required to deliver Biodiversity Net Gain (BNG) to conserve and enhance biodiversity through the following measures:

1. Meeting the City's BNG target on-site score of achieving a minimum of three biodiversity units per hectare (BU/ha);
2. Providing the biodiversity value of the site pre-development and post-development after applying the mitigation hierarchy. Information on habitats of known value to biodiversity to be incorporated and maximised on-site, achieving a minimum three BU/ha;

3. Any off-site areas proposed for habitat creation or enhancement for both pre-development and post development. However the City expects delivery to be achievable on-site and off-site provision should be a last resort;
4. If it is not feasible to achieve the target score on-site then offsetting will be required, with preference given to off-setting schemes that help with the delivery of wider City of London Corporation policies and strategies, through the use of nature-based solutions and maximise opportunities for local nature recovery;
5. Providing the following information:
  - A Preliminary Ecological Appraisal Report (PEAR) or other appropriate Ecological Assessment alongside a survey of habitat and a completed Defra Biodiversity Metric (DBM) spreadsheet at planning application stage;
  - A Biodiversity Gain Plan (BGP) setting out the enhancements that will be incorporated on site to meet the BNG score, secured through condition prior to commencement;
  - A Habitat Management and Monitoring Plan (HMMP) setting out maintenance, management and monitoring of enhancements and the post-development biodiversity values of the site, secured through condition prior to commencement of the development.

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### Reason for the policy

- 15.1.40. Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a better state than before. Major new developments are required to deliver BNG and the Environment Act 2021 requires them to provide a minimum 10% BNG. Habitats will need to be secured for at least 30 years and Defra's statutory Biodiversity Metric (DBM) 4.0 is the current method for calculating BNG but this may change. Due to the City's highly urban nature and the high proportion of sites with a zero (or close to zero) baseline for biodiversity, the mandatory 10% BNG is not considered an apt mechanism for delivering meaningful improvements in the Square Mile; an approach using biodiversity units per hectare (BU/ha) is more appropriate. The City's BNG policy is in addition to government's BNG regulations and should be read in conjunction with NPPF, BNG legislation, regulations and BNG Planning Practice Guidance.
- 15.1.41. The Biodiversity Net Gain Study (2023) examined a range of development sites across the City and found that if biodiversity were maximised on these sites, they could have delivered an average of 3.41 biodiversity units per hectare (BU/ha). This evidence has informed the policy target set of achieving a minimum of three BU/ha rather than a percentage increase.

### How the policy works



- 15.1.42. All major developments are expected to submit a Preliminary Ecological Appraisal Report (PEAR) or other appropriate Ecological Assessment alongside a completed Defra Biodiversity Metric (DBM) in line with national requirements setting out how the development will meet the City of London's BNG target score of achieving a minimum three BU/ha on-site. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should include baseline and proposed habitat mapping. When determining the Biodiversity Gain Plan (BGP), the Biodiversity Gain Hierarchy emphasises that on-site biodiversity gain should take priority above off-site and biodiversity credits. The City of London Corporation may seek independent ecological advice to review submitted BNG reports. It is expected this independent assessment will be funded by the developer and further information may be sought.
- 15.1.43. To ensure the biodiversity objectives are met BNG should be considered throughout the planning process. The latest DBM or agreed equivalent will be used to quantify the biodiversity value of the site pre-development, post-development after application of the mitigation hierarchy and for any off-site areas proposed for habitat creation or enhancement both pre and post development. The City Corporation expects habitat creation to be delivered and maximised on-site providing biodiversity to the immediate area before off-setting is considered. Biodiverse features of value to wildlife should support the City of London's BAP, including target species and target habitats, but are not included within the DBM. Developers are expected to set-out BNG as an integral design aspect of the overall scheme and delivery meaningful ecology to increase levels of biodiversity in the City. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should include baseline and proposed habitat mapping. Section 106 obligations may be sought for monitoring of major applications for BNG delivery.
- 15.1.44. The Urban Greening Factor (UGF) tool establishes the provision of urban greening in new developments and does not measure biodiversity benefits of proposals. However, higher scoring surface cover types within the UGF are often ones which can delivery benefits for biodiversity. There is an opportunity to unlock additional space for BNG by steering associated soft landscaping towards habitat creation therefore providing more biodiversity on-site which is of benefit to local wildlife.

#### **Policy OS54: Trees**

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The City Corporation will seek to increase the number of trees and their overall canopy cover by:

1. Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate;
2. Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value;

3. Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value;
  4. Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; and
  5. Promoting tree planting to provide a diverse range of tree species, including large-canopy trees wherever practicable, **especially in places that would contribute to the green routes set out in figure XX.**
  6. **Ensuring tree species are consistent with the Climate Action Strategy and Biodiversity Action Plan (BAP), and promote habitats and forage for target species, especially pollinators.**
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#### Reason for the policy

- 15.1.45. There are just over 2,500 trees in the City, which are found in a variety of locations: along streets, in open spaces such as churchyards and livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.
- 15.1.46. Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to enhancing amenity and townscape. Trees provide a wide range of benefits in the urban environment, including the trapping of air pollutants, enhancing biodiversity, providing shade and shelter from sun and rain, absorbing rainwater and filtering noise.
- 15.1.47. The City of London Tree Strategy SPD aims to increase the number of City Corporation owned trees and ensure that all trees within the City are managed, preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the townscape for both current and future generations. The Tree Strategy SPD will be kept under review and should be read alongside the City of London Biodiversity Action Plan (BAP).
- 15.1.48. Trees play an important role in connecting green spaces to create green corridors. Additional planting where feasible will help to reinforce those corridors. **The green routes identified in figure XX set out priority corridors for greening the City.** It is important that new tree planting includes a variety of species to increase the resilience of the City's tree stock against the threat of disease and the impacts of a changing climate.

#### How the policy works

- 15.1.49. Developers will be expected to safeguard existing trees, plant new trees and only remove trees in exceptional circumstances. Where trees are removed during development works, replacement trees of an appropriate species, height and canopy cover must be planted when works are completed. The City Corporation

will seek financial compensation for any trees removed or damaged without permission. This value will be based on a recognised tree valuation method such as the Capital Asset Value for Amenity Trees (CAVAT) or i-Tree Eco.

15.1.50. The City Corporation will use TPOs, s106 planning obligations or conditions to ensure the retention of existing trees and the provision of new trees.

DRAFT

# 16. Climate resilience

## 16.1. Climate Resilience and Flood Risk

### Context

16.1.1. ~~This section aims to ensure that the City of London remains resilient to changing climate patterns. The main focus is on flood risk and the risk of overheating of buildings and spaces which will become more frequent as a result of climate change.~~

~~The UK Climate Projections (CP18) predict that London will experience a rise in mean temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review. The City Corporation has adopted a Climate Action Strategy setting out how the City can transition to a zero carbon economy by 2040 and be resilient to the impacts of climate change.~~

### **Strategic Policy S15: Climate Resilience and Flood Risk**

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Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

1. Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;
2. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
3. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise;
4. **Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.**

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### Reason for the policy

16.1.2. Today's new buildings will probably be in place for decades or longer and must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will help keep the City safe and comfortable as climate patterns change. [The UK Climate Projections \(CP18\) predict that London will experience a rise in mean](#)

temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an urban heat island effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review. Policy DE1 (Sustainability standards) sets out standards for new development in the City and the City Corporation's ambition to move to a zero emission City by 2040. This includes scope 3 emissions and embodied carbon which can be addressed through whole life carbon assessment.

16.1.3. Although the total annual rainfall is projected to remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.

16.1.4. The City lies within the tidal section of the Thames and is vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan identifies the need for the existing flood defences in central London to be raised by up to 0.5m by ~~2065~~ **2050** and 1m between ~~2065~~ **2050** and 2100 to protect London from flooding.

#### How the policy works

16.1.5. The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making through implementation of, and annual monitoring and review of, the City Corporation's Climate Action Strategy. UK Climate Projections and the detailed actions in the Climate Action Strategy ~~will~~ form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.

16.1.6. ~~Developers will be required to demonstrate that their proposals have taken account of predicted climate change and will minimise the impacts of changed climate patterns on future occupants and the City's communities.~~

#### **Policy CR1: Overheating and Urban Heat Island Effect**

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1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:

- solar shading to prevent solar gain, particularly on glazed facades;
- urban greening to improve evaporative cooling;
- passive ventilation and heat recovery;
- use of thermal mass to moderate temperature fluctuations;

- minimal reliance on energy intensive cooling systems.

2. Building designs should minimise any contribution to the urban heat island effect.

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### Reason for the policy

16.1.7. Development presents an opportunity to renew or adapt the existing building stock and public spaces, or provide new buildings and spaces, which will cope better with changing climate patterns. The design of buildings should reduce energy demands from cooling infrastructure, making them more resilient to higher temperatures. Measures such as urban greening and design features that provide shade and shelter can have a positive impact on or near the building, minimising the urban heat island effect (see Policy OS2).

16.1.8. Climate adaptation measures can contribute to wider benefits by pre-empting potential detrimental climate impacts. Careful selection of plants which are resilient to a range of weather conditions will assist wildlife to survive changed climate conditions. Urban greening and reduced reliance on air conditioning will have benefits for the City's air quality.

### How the policy works

16.1.9. For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.

16.1.10. For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.

### **Policy CR2: Flood Risk**

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All development within the City flood risk area, and major development elsewhere, must be accompanied by a site-specific flood risk assessment demonstrating that:

1. the site is suitable for the intended use, in accordance with the sequential and exception tests (see tables 4 and 5) and with Environment Agency and Lead Local Flood Authority advice;
2. the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere;
3. safe access and egress routes are identified; and
4. flood resistance and resilience have been designed into the proposal.



### Reason for the policy

- 16.1.11. While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water/or sewer overflow in the former Fleet valley.
- 16.1.12. Figure 25 identifies the areas at risk from these sources as the City flood risk area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

### How the policy works

- 16.1.13. Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment ([SFRA](#)) and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development. Design and mitigation measures such as sustainable drainage systems may provide protection from flooding for properties beyond the site boundaries.
- 16.1.14. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 4 shows the vulnerability classifications and Table 5 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. The Environment Agency's flood zones are shown on the Policies Map. Thesequential test must be applied for all development other than minor development or change of use in the City flood risk area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water or sewer flooding. Where a change of use results in a more vulnerable use, evidence must be presented to demonstrate safety and suitable access and egress routes. Where necessary, conditions may be attached to planning permissions to manage the change of use into more vulnerable categories.

<b>Essential Infrastructure</b>	<ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations</li> </ul>
<b>Highly Vulnerable</b>	<ul style="list-style-type: none"> <li>• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Installations requiring hazardous substances consent.</li> </ul>
<b>More Vulnerable</b>	<ul style="list-style-type: none"> <li>• Hospitals</li> <li>• Residential institutions such as care homes and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Sites used for waste management facilities for hazardous waste.</li> </ul>
<b>Less Vulnerable</b>	<ul style="list-style-type: none"> <li>• Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure.</li> <li>• Police, ambulance and fire stations which are not required to be operational during flooding.</li> <li>• Waste treatment (except hazardous waste facilities).</li> </ul>
<b>Water-compatible development</b>	<ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Sewage transmission infrastructure and pumping stations</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> </ul>

Table 4: Flood risk vulnerability classifications relevant to the City  
Source: Relevant uses from Planning Practice Guidance – Flood Risk and Coastal Change

16.1.15. If the intended use of a site falls into one of the categories where an exception test is required, as set out in Table 5, the developer will need to investigate whether there is a reasonably available site outside the City flood risk area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the exception test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Flood Risk Vulnerability classification	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
EA Zone 1	✓	✓	✓	✓	✓
EA Zone 2	✓	Exception Test required	✓	✓	✓
EA Zone 3a	Exception Test required	x	Exception Test required	✓	✓
EA Zone 3b	Exception Test required	x	x	x	✓
SFRA Surface water/sewer flood risk areas	Exception Test required	x	Exception Test required	✓	✓

Table 5: Suitability of different uses in flood zones  
Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

16.1.16. The City of London [Strategic Flood Risk Assessment \(SFRA\)](#) provides guidance on suitable flood resistance measures to prevent water entering the building and flood resilience measures, which enable speedy recovery in the event of flooding. These measures should be specified for all development within the City flood risk area and may be controlled by condition. Passive design measures such as suitable threshold levels and the use of flood resilient materials will be favoured over active measures such as removable flood barriers. All sleeping accommodation must be located above the modelled tidal breach level as shown in the SFRA unless it can be demonstrated that a permanent fixed barrier at the threshold of the property would prevent water ingress in a breach event.

16.1.17. Design measures can help to reduce flooding, thus protecting the local area beyond the development site, through:

- sustainable drainage systems;
- green/blue roofs; and
- rainwater reuse, recycling and attenuation

16.1.18. Resistance to flooding can be achieved through design measures such as:

- raised kerbs and altered topography which contains water at a distance from the building;
- avoiding opening windows or vents at ground floor or basement levels;
- using low permeability materials to limit water penetration of external walls, and flood resistant doors to prevent water ingress; and
- fitting non-return valves on plumbing to prevent sewer surcharge within the building.

16.1.19. Flood resilience measures make clean up after a flood more efficient, and include:

- avoiding locating sensitive equipment such as computer servers at lower levels of buildings in flood prone areas;
- locating all fittings, fixtures and services at a suitable height to minimise damage by flood waters;
- using impermeable surfaces and structures; and
- providing sumps and soak-aways that gradually release water to the sewer network.

16.1.20. In order to demonstrate that the development will be safe for occupants, flood warning and evacuation plans should be provided for all 'more' or 'highly' vulnerable development within the City flood risk area. Details of the type of measures which should be included in an evacuation plan are set out in the City's SFRA.

16.1.21. For minor development outside the City flood risk area, an appropriate flood risk statement should be included in the Design and Access Statement.

### **Policy CR3: Sustainable drainage systems (SuDS)**

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1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as

close as possible to greenfield rates and the number of discharge points has been minimised.

3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.

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#### Reason for the policy

- 16.1.22. The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City flood risk area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.
- 16.1.23. More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

#### How the policy works

- 16.1.24. All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.
- 16.1.25. For major development, pre-application discussion with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the Environment Agency, Thames Water and other interested parties is encouraged to ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan drainage hierarchy (see London Plan policy SI 13) and local requirements should be discussed at pre application stage with the City Corporation.

- 16.1.26. Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.
- 16.1.27. For all major development, a separate SuDS and Drainage Plan must be submitted at application stage. For minor development the Design & Access Statement should include details of how rainwater run-off has been minimised. Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.
- 16.1.28. Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.
- 16.1.29. Arrangements for maintenance throughout the life of the building must be considered in the design of SuDS. Planning conditions may be used to secure a suitable operations and maintenance plan.

#### **Policy CR4: Flood protection and flood defences**

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1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
  2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm.
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#### Reason for the policy

- 16.1.30. The City of London is protected from flooding by the Thames Barrier, and more locally by flood defence walls along the River Thames. The Thames Estuary 2100 (TE2100) project recognises the need for the raising of flood defences by up to 0.5m by ~~2065~~ 2050 and 1m by 2100.

#### How the policy works

- 16.1.31. Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future flood defence raising without adverse impacts on river views, the setting of historic buildings and pedestrian movement along the riverside walk. Constraints may exist where flood defences form part of an existing building. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.



16.1.32. A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

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## 16.2. Circular Economy and Waste

### Context

16.2.1. ~~The City Corporation is the Waste Planning Authority (WPA) for the Square Mile, with a statutory duty to plan for all the waste that is generated in the City. With no waste treatment plants in the City, the City Corporation relies on WPAs elsewhere to provide such facilities. By applying circular economy and waste hierarchy principles: designing for durability and modularity, making better use of under-used assets through sharing, reusing products and materials and recycling as much as possible, waste can be designed out and embodied carbon retained. This approach will reduce waste exports from the City whilst application of the proximity principle will ensure that residual waste is processed as close as possible to the City.~~

### **Strategic Policy S16: Circular Economy and Waste**

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1. The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities (WPAs) in planning for capacity to manage the City's residual waste through:
  - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other London [Waste Planning Authorities WPAs](#);
  - Co-operating with [Waste Planning Authorities WPAs](#) within and beyond London to plan for suitable facilities for the City's waste;
  - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste; and
  - Monitoring waste movements to and from the City and reviewing its waste arisings and capacity study at least every five years.

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### Reason for the policy

16.2.2. The City Corporation has responsibility to plan for adequate facilities to manage the waste that originates in the City. This includes waste collected from the City's households and businesses, waste generated in the process of redevelopment and hazardous waste from premises such as St Bartholomew's Hospital.

16.2.3. The London Plan and the London Environment Strategy set the framework for waste management in London. These strategies promote circular economy principles and the waste hierarchy: prevention, preparing for reuse, recycling, other recovery, and disposal only as a last resort.

- 16.2.4. The current London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage ~~100,000~~ **90,000** tonnes of waste annually ~~until 2036~~ **by 2041, with an apportionment in 2021 of 84,000 tonnes.** ~~In the draft London Plan, the proposed apportionment for the City is reduced to 84,000 tonnes per annum in 2021 and 90,000 tonnes per annum in 2041.~~ This figure represents the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's household and commercial and industrial waste from 2026.
- 16.2.5. The London Plan sets out criteria for the selection of waste management sites, which the City of London Waste Arisings and Waste Management Capacity Study review 2016 used to evaluate potential sites in the City. This study concludes that, with current technologies and economic considerations, there is no viable waste management capacity within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries.
- 16.2.6. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Joint Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum and will work with the GLA and the Environment Agency to improve waste planning.
- 16.2.7. For commercial reasons, a proportion of the City's waste will continue to be transported to sites outside London. This includes construction, demolition and excavation (CD&E) waste which is not covered by the Mayor's targets for net self-sufficiency. Annual monitoring of such waste exports will inform Duty to Co-operate discussions with receiving authorities within and outside London to ensure that sufficient capacity remains in the planning pipeline.
- 16.2.8. The London Plan sets out ~~borough~~ apportionments for land-won aggregates ~~for a small number of boroughs,~~ which **does not include** ~~should be reflected in local plans. No apportionment is made for~~ the City of London and there is no requirement to include a policy for minerals within the Local Plan. Application of circular economy principles encourages the re-use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported aggregates and retain embodied carbon.
- 16.2.9. It is imperative that the City adopts circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment.

#### How the policy works

- 16.2.10. The City Corporation will continue to monitor the quantities and types of waste originating in the City and work with the City's communities to minimise this waste,

applying circular economy principles to design out waste and pollution and keep products and materials in use. The City Corporation will continue to work with the South-East London Joint Waste Planning Group and other [Waste Planning Authorities WPAs](#) in London and beyond to ensure that the City's waste apportionment is met and that suitable facilities are available for the City's waste to be managed in the most sustainable way.

16.2.11. Changing economics and new waste management technologies means that small scale waste management is becoming more viable within the City, particularly within large development sites.

16.2.12. During the period ~~2021-2041~~ ~~2018-2036~~ a proportion of the City of London's waste will continue to be managed outside London. Co-operation with [Waste Planning Authorities WPAs](#) outside London will aim to ensure that facilities with sufficient capacity remain available to accept the City's waste during this period.

16.2.13. The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.

16.2.14. [Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged. The level of detail required at the planning application stage will be proportionate to the scale of development.](#)

16.2.15. [The Environmental Statement \(for EIA applications\) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.](#)

### **Policy CE1 Zero Waste City**

- ~~1. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.~~
- ~~2. Development should be designed to promote circular economy principles throughout the life cycle of the building through:
  - ~~● Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;~~
  - ~~● Re use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources and retain embodied carbon;~~
  - ~~● Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials;~~~~

- Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage; and
- Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.

2. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.

### Reason for the policy

- 16.2.16. The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer, waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.
- 16.2.17. The design of buildings impacts on the potential for implementation of the waste hierarchy during their operational stage, through the facilities and waste management services that are incorporated into the design. For example, reliance on single use coffee cups and disposable plastics can be reduced by incorporating kitchen facilities and water fountains into building designs and waste movements can be reduced by managing food waste on-site through composting or anaerobic digestion. These facilities must be considered at the building's design stage.
- 16.2.18. Waste prevention is the most desirable action in the waste hierarchy as it results in no waste whatsoever. Re-use is the next most desirable option as it involves products and materials being used again for their original intended purpose. Recycling is the next most preferable option, involving the collection of used items and processing them into raw materials to be remanufactured into usable products or materials. The recovery of energy, through techniques such as anaerobic digestion, is a way of getting the most out of otherwise useless waste. Disposal should be the absolute last resort, after all the other options have been exhausted.
- 16.2.19. On major developments opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and beyond the City. The City of London Waste Arisings and Capacity Study identifies a range

of options which should be considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.

- 16.2.20. Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage of design to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be provided for, where necessary.

#### How the policy works

- 16.2.21. Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged. The level of detail required at the planning application stage will be proportionate to the scale of development.
- 16.2.22. The Environmental Statement (for EIA applications) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

#### **EIA Development**

- 16.2.23. For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should demonstrate how circular economy principles have been incorporated into the development, fully addressing how construction, demolition and excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.
- 16.2.24. A Circular Economy Statement following the London Plan guidance should be submitted for all EIA development.

#### **Other Major development**

- 16.2.25. For all other Major development proposals, the sustainability statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.
- 16.2.26. A Circular Economy Statement following the London Plan guidance should be submitted for all Major development.



## All other development

- 16.2.27. ~~For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.~~
- 16.2.28. ~~Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.~~
- 16.2.29. ~~The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.~~

## **Policy CE12: Sustainable Waste Facilities and Transport**

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**All development proposals should incorporate waste facilities, which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.**

The environmental impact of waste transport will be minimised through:

1. Encouraging the use of rail and waterways for removal of waste, including deconstruction waste and delivery of construction materials;
2. Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;
3. Requiring low and zero emissions transport modes for waste movement;
4. Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi-site consolidation of waste.

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### Reason for the policy

- 16.2.30. **On major developments, opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and beyond the City. The City of London Waste Arisings and Capacity Study identifies a range of options which should be**



considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.

- 16.2.31. Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage of design to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be provided for, where necessary.
- 16.2.32. Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term-lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.
- 16.2.33. The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.
- 16.2.34. The proximity principle advocates that waste should be managed as close as possible to where it originates to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic, and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.
- 16.2.35. Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.
- 16.2.36. This policy aims to maximise the use of the River Thames for waste transport, encourage transport modes such as rail and other waterways and encourage efficient use of low and zero emissions road vehicles for transporting waste.

## How the policy works

16.2.37. The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste, [including the reduction of emissions from river transport](#).

### **Major development**

16.2.38. Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles will be enabled during the operational phase of the building's life.

### **All other development**

16.2.39. Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed.

## **Policy CE23: New waste management sites**

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1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:
    - the development will handle waste which has been generated locally;
    - access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
    - the carbon impact of the development will be minimised. New waste facilities [generating energy from waste](#) should comply with the Mayor's Carbon Intensity Floor (CIF); and
    - the development is resilient to natural and man-made safety and security challenges.
  2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf, and development [which that](#) would compromise the use of the river for waste operations, will be resisted.
  3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.
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### Reason for the policy

16.2.40. Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

### How the policy works

16.2.41. Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be a key matter in consideration of proposals. Mitigation which resolves potential conflicts may be necessary for development to proceed.

16.2.42. The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and conditions will be applied to ensure that any new facility is suitable for the City's high-density urban environment.

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# 17. The Temples, the Thames Policy Area and the Key Areas of Change

## Introduction

- 17.1.1. This section of the Plan sets out area-based policies and proposals relating to seven 'Key Areas of Change', together with an overarching policy which applies to the whole of the City's riverside. The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus.
- 17.1.2. Identifying Key Areas of Change provides a policy framework for bringing forward beneficial change within those areas, including the delivery of key development schemes, improving accessibility and the quality of the public realm, and introducing new uses or mixes of uses. The Key Areas of Change also provide a strategic context for the development of projects and funding bids by a range of City Corporation departments and external partners.
- 17.1.3. The Key Areas of Change are shown indicatively on the Key Diagram and on the individual diagrams that accompany each area policy.
- 17.1.4. Where appropriate, the City Corporation will prepare further guidance to support the delivery of the vision for particular Key Areas of Change. This may take the form of planning briefs or supplementary planning documents and will be produced in partnership with key stakeholders and local landowners.

## 17.2. The Temple

### Policy TP1: The Temple

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The City Corporation will continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students, including providing professional accommodation for barristers. Development in the Temples area that supports these functions, including improvements to the accessibility of buildings, will be supported.

Opportunities to enhance and create additional greening and open spaces that enhance the historic character of the Temples will be encouraged.

Within the Temples, adjustments between professional and residential accommodation will be permitted where it is important to the functioning or character of the Temple, or to the continuing use of their buildings.

- ~~the overall balance of residential and professional chambers is maintained;~~

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### Reason for the policy

17.2.1. The Inner and Middle Temples are two of the Inns of Court which provide accommodation, and enable education and training and many other facilities – such as libraries, meeting rooms, lecture rooms, and dining facilities – for the legal profession in the southwest of the City between Fleet Street and the River Thames. Along with other nearby Inns of Court and the Royal Courts of Justice in Westminster, the Temples form part of a specialist legal cluster recognised in the London Plan. The Temples are within a Conservation Area and contain a significant concentration of listed buildings.

17.2.2. The Temples mainly contain barristers' chambers, together with other accommodation for Members of the Bar. The Inner and Middle Temples have a strong collegiate atmosphere due to the mix of workspaces, residential, commercial and communal uses. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

### How the policy works

17.2.3. In determining applications, the City Corporation will have regard to the importance and long term balance of the continued existence of residential, office and support uses in the Temples and the contribution that this makes to their special character. However, the need to rationalise and refurbish chambers in order to maintain an efficient business and professional community is recognised. To enable the continued use of the buildings in the Temples, physical changes to the fabric of the historic buildings, especially for the purposes of improved accessibility, may be required. Alterations and additions must be

**informed by and respect the unique historic and architectural character of the area and the buildings and structures within it.**

### **17.3. Thames Policy Area**

#### **Context**

- 17.3.1. ~~The River Thames is an iconic feature of London that forms the southern boundary of the City and plays a major role in its prosperity and everyday life. The riverside provides a breathing space from the busy environment which characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames.~~
- 17.3.2. ~~The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City and a Site of Metropolitan Importance for Nature Conservation (SMINC). The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.~~
- 17.3.3. ~~The London Plan requires the City's Local Plan to designate and ensure the maintenance of a Thames Policy Area and to take account of emerging Maritime Spatial Plans prepared by the Marine Management Organisation. Policy S17 sets out the policy considerations which apply to the whole of the City's riverside, as defined on the Policies Map. Further detailed guidance is provided in the City Corporation's Thames Strategy SPD. The City Corporation's Riverside Walk Enhancement Strategy sets out its plans for public realm enhancement along the riverside, which forms part of the Thames Path National Trail.~~
- 17.3.4. ~~The River Thames changes character on its way through the City, as it does through London. It includes areas where very limited change is likely to occur, such as at The Temples. However, two areas, at Blackfriars and the Pool of London, have been identified as Key Areas of Change because they are places where renewal is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. Policies relating to Blackfriars and the Pool of London follow the overarching policy for the Thames Policy Area.~~

#### **Strategic Policy S17: Thames Policy Area**

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The unique character of the City's riverside, and its uses for transport and recreation, will be enhanced by:

- ~~1. Designating the Thames Policy Area and preparing and keeping under review a Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.~~

~~2. Co-operating with neighbouring boroughs to develop a joint Thames Strategy for the central section of the River Thames.~~

3. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the **City of London Riverside Strategy and** Riverside Walk Enhancement Strategy, particularly through:

- protecting and enhancing **permanent** public access and river views along the riverside walk ~~and securing completion of the riverside walk at Queenhithe;~~
- improving access to the River Thames by enhancing north-south routes and the ~~creation of a continuous~~ **widening of the** riverside walk;
- **maximising opportunities for public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the riverside walk;**
- improving the vibrancy of the riverside by **requiring new development to provide active frontages where appropriate;**
- encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value; and
- provision of publicly accessible roof terraces, where they do not impact adversely on protected views, the amenity of occupiers or nearby residents; ~~and~~
- ~~supporting the Illuminated River project to deliver more sustainable bridge lighting and engage visitors with the River.~~

4. Supporting, and safeguarding land for, the construction of the Thames Tideway Tunnel.

5. Promoting the use of the River Thames and its environs for transport, navigation and recreation, particularly through:

- safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
- encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- refusing development on or over the River, except for structures ~~which that~~ specifically require a waterside location for river-related uses;
- resisting the permanent mooring of vessels; ~~if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a~~



~~river-related purpose and not have a detrimental impact on navigation or the environment;~~ and

- maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

6. Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.

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### Reason for the policy

17.3.5. The River Thames is an iconic feature of London ~~and the City, that forms the southern boundary of the City and plays a major role in its prosperity and everyday life.~~ The riverside provides a breathing space from the busy environment that characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames. **However, the riverside is not currently fulfilling its potential as a recreation, leisure and tourism destination despite its many positive attributes.**

17.3.6. The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City, **a key environmental asset,** and a Site of Metropolitan Importance for Nature Conservation (SMINC). The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.

17.3.7. ~~The London Plan requires the City's Local Plan to designate and ensure the maintenance of a Thames Policy Area and to take account of emerging Maritime Spatial Plans prepared by the Marine Management Organisation. Policy S17 sets out the policy considerations which apply to the whole of the City's riverside, as defined on the Policies Map. Further detailed guidance is provided in the City Corporation's Thames Strategy SPD. The City Corporation's Riverside Walk Enhancement Strategy sets out its plans for public realm enhancement along the riverside, which forms part of the Thames Path National Trail.~~

17.3.8. ~~The River Thames changes character on its way through the City, as it does through London. It includes areas where very limited change is likely to occur, such as at The Temples. However, two areas, at Blackfriars and the Pool of London, have been identified as Key Areas of Change because they are places where renewal is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. Policies relating to Blackfriars and the Pool of London follow the overarching policy for the Thames Policy Area.~~ There are a range of different strategies and plans which affect the Thames including:

- The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area.
- The Mayor of London's Safeguarded Wharves Review 2018-19, which aims to ensure that London's need for waterborne freight-handling uses is met.
- The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues.
- [The Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.](#)
- [The City of London Riverside Strategy, which provides guidance for the management of the river flood defences in the Square Mile, including the approach to raising the flood defences over the coming century whilst also providing benefits to the workers, residents and visitors that use the Thames river frontage.](#)
- The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements.
- Guidance called A Safer Riverside produced by the Port of London Authority, which aims to reduce the number of people drowning in the Thames by ensuring that safety is an intrinsic part of all development alongside and on the tidal Thames.
- The UK Marine Policy Statement and the ~~emerging~~ South East Marine Plan ~~(2021)~~ produced by the Marine Management Organisation, ~~which will~~ provide a wider strategic context. ~~Until that Plan has been adopted, reference should be made to the UK Marine Policy Statement, which sets out a framework and UK high level marine objectives.~~

17.3.9. The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

17.3.10. The London Plan notes that no joint strategy currently exists for the central section of the Thames between Chelsea and Tower Bridge, and the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy. ~~The City Corporation is undertaking research into the practical implications of raising the City's flood defences in line with the Thames Estuary 2100 Plan and is collaborating with neighbouring boroughs to promote shared learning and a common approach by all riparian authorities in central London.~~

17.3.11. A key infrastructure project is the development of the Thames Tideway Tunnel, which is a 25km tunnel running mostly under the tidal section of the River Thames through central London. It is intended to capture and divert storm overflows, including the Fleet Combined Sewer Outflow at Blackfriars, to Beckton Sewage Treatment Works to avoid discharging them into the river.

7.2.9 The 'Illuminated River Project' is a long-term art installation that involves the architectural illumination of bridges across central London. The project will animate the river and create further opportunities to develop the riverside walk for the enjoyment of visitors and London communities. The scheme commenced in summer 2019 and when complete will incorporate 15 bridges in total, of which six are partly or wholly in the City of London.

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## 17.4. Blackfriars Key Area of Change

### Context

- 17.4.1. The area contains a mix of uses, including offices and commercial uses, the City of London School, the Mermaid Events Centre, The Guild Church of St Benet Paul's Wharf, a public car park, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, few active frontages and a lack of open space.
- 17.4.2. It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the Riverside Walk from the rest of the City. Access to the Riverside Walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark and Blackfriars Station is a major Underground and Rail station.
- 17.4.3. There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new area of public realm built out into the river west of Blackfriars Bridge, which is due for completion in 2025. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views.

### Strategic Policy S18: Blackfriars

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The character and amenities of the Blackfriars Key Area of Change will be enhanced by:

1. Making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the river Thames and the riverside walk for all;
2. Promoting substantial comprehensive redevelopment or refurbishment of existing post-war buildings to provide new high-quality office and commercial accommodation with active frontages at ground floor and mezzanine level and elevated public spaces including roof gardens;
3. Implementing the Thames Tideway Tunnel project and creating a high-quality new area of public realm at Blackfriars Bridge foreshore (Bazalgette Embankment), and seeking opportunities to enhance the area underneath the Blackfriars undercroft for suitable sports, leisure, or recreation;
4. Enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside, including appropriate widening of the Riverside Walk, improvements to Blackfriars Underpass, and the provision of

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new and improved links across Queen Victoria Street and Upper Thames Street to provide new north-south routes;

5. **Seeking provision of a new entrance to the east side of Blackfriars station that gives improved pedestrian connectivity to the riverfront;**
  6. **Preserving, enhancing and celebrating the area's heritage and historic assets and giving careful consideration to protected views;**
  7. Encouraging **new** cultural, **leisure and recreation facilities, the retention or renewal of existing facilities where appropriate, and** events, arts and play in public spaces, ~~ensuring the retention or renewal of existing facilities, where appropriate;~~ and
  8. Improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of The Guild Church of St Benet Paul's Wharf.
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#### Reason for the policy

- 17.4.4. The area contains a mix of uses, including offices and commercial uses, the City of London School, the Mermaid Events Centre, The Guild Church of St Benet Paul's Wharf, a public car park, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, few active frontages and a lack of open space. **The area has a rich history including the Dominican monastery and Blackfriars Theatres and likely archaeological remains, including those relating to Baynard's Castle, which should be celebrated and better revealed as part of redevelopment.**
- 17.4.5. It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the Riverside Walk from the rest of the City. Access to the Riverside Walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark, and Blackfriars Station is a major underground and rail station.
- 17.4.6. There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new area of public realm **(Bazalgette Embankment)** built out into the river west of Blackfriars Bridge, which is due for completion in 2025/26. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views. **The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the**

riverside's rich archaeological and ecological heritage, are important considerations in this area.

- 17.4.7. ~~This area contains some post-war development which is underused and does not contribute to the context or setting of its location. Except for the area adjacent to Blackfriars Station, this part of the City lacks vibrancy and due to the road network is notable for a relative lack of pedestrian permeability. Blackfriars has been identified as a Key Area of Change to facilitate beneficial commercial redevelopment, although this may be a medium or longer-term option due to existing leasehold arrangements.~~
- 17.4.8. ~~Baynard House is a large office site and data centre, which includes a public car park. It is key to the potential renewal of Blackfriars, since redevelopment of this site would provide an opportunity to improve the quality of architecture and sense of place, to redesign the road network to reduce the dominance of vehicular traffic and to achieve direct pedestrian routes to the riverside.~~
- 17.4.9. Significant **Comprehensive** redevelopment would provide an opportunity for public realm improvements along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. New active frontages will be sought as an integral part of any redevelopment. Pedestrian links across Upper Thames Street will be improved wherever possible to link the riverside to the rest of the City and to provide easier access to Blackfriars Pier. Proposals for redevelopment and the redesign of streets would be required to enhance the setting of The Guild Church of St Benet's Paul's Wharf and make it a more pleasant area to visit and dwell.
- 17.4.10. The public realm created by the Thames Tideway Tunnel project at Blackfriars Bridge (**Bazalgette Embankment**) will introduce additional greenery to the riverside and will bring more activity to the area by providing a new place for relaxation and recreation. This facility will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new area of public realm, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route, **including appropriate widening**, between Blackfriars Bridge and Millennium Bridge. There is potential to enhance heritage assets and their setting by increased pedestrian permeability and there will be new views of Blackfriars Bridge and this part of the City from the new area of public realm.



## 17.5. Pool of London Key Area of Change

### Context

- 17.5.1. The area is the heart of what was once a London's port which now contains predominately office and commercial uses, with some residential and hotel use and small-scale retail adjacent to the Tower of London. There are no tube or train stations within the area, but it is well served by public transport just outside the area, including London Bridge Station, Tower Hill and Monument Underground Stations, Tower Gateway DLR Station and the bus route along Eastcheap. River passenger services operate from Tower Pier.
- 17.5.2. Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is very poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge. However, there is limited retail or ground floor vibrancy and the public realm is uninspiring and does not reflect the importance of this area.
- 17.5.3. The building stock is a mix of offices, listed buildings, with modern residential and hotel development to the east. St Magnus the Martyr Church, All Hallows by the Tower Church and Custom House are Grade I listed. Adelaide House and Old Billingsgate Market are Grade II listed, while Custom House Quay, cranes and stairs are Grade II\* listed. Listed buildings and their key features should be enhanced. The eastern part of this area is within the local setting of the Tower of London World Heritage Site. The height of new buildings is limited by strategic and locally protected views.
- 17.5.4. Several key buildings are likely to be vacated in the short term, providing an opportunity for renewal through development and public realm improvements which enhance heritage assets. The aim is to achieve a City riverside which complements that on the south bank of the Pool of London.
- 17.5.5. The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath Billingsgate Market and the Billingsgate Bathhouse are Scheduled Monuments.



## Strategic Policy S19: Pool of London

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The Pool of London Key Area of Change will be renewed through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:

1. **Making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the river Thames, public spaces and the riverside walk for all;**
2. Enabling office-led mixed commercial use redevelopment or refurbishment, including the provision of retail, cultural and leisure uses **which that** are complementary to, and do not detract from, the primary business function of the City and **which that** enhance heritage assets.
3. Requiring increased vibrancy and active frontages at ground floor, **rooftop and terrace** levels, through the provision of retail and publicly accessible leisure and cultural uses on the river frontage.
4. Encouraging the provision of **recreation**, cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through **Cultural Culture and Vibrancy** Plans.
5. **Maximising opportunities to increase the quantity and quality of public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the riverside walk;**
6. **Optimising the use of historic assets and spaces around them in ways that help to better reveal their heritage, create inclusive and welcoming environments and help to make the riverfront more vibrant and accessible for all;**
7. Preserving and enhancing the area's significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation.
8. Improving transport connections and pedestrian links by:
  - improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
  - improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;
  - improving signage to and from the Pool of London to the Tower of London;
  - improving the servicing of buildings, encouraging the development of shared servicing bays and access points and collaborative management; and

- preventing vehicular access onto the riverside walk and removing car parking areas upon redevelopment.
9. Enhancing public realm and public spaces by:
- enhancing the Riverside Walk to create a continuous publicly accessible walkway free of cars between London Bridge and Tower Bridge which is accessible to all;
  - identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and buildings on redevelopment; and
  - **seeking maximizing opportunities from development to create additional inclusive public space and play facilities.**

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Reason for the policy

- 17.5.6. The area is the heart of what was once the historic port of London and is adjacent to the Tower of London. It contains key heritage assets including Custom House; the churches of All Hallows by the Tower and St Magnus the Martyr; Adelaide House; Old Billingsgate Market and the quay, cranes and stairs on the riverside in front of Custom House.
- 17.5.7. Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is very poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge. However, there is limited retail or ground floor vibrancy and the public realm is uninspiring and does not reflect the importance of this area.
- 17.5.8. There is an opportunity for renewal through development and public realm improvements that enhance and better-reveal heritage assets. The aim is to achieve a City riverside that complements the south bank while retaining and enhancing its own distinct character.
- 17.5.9. The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath old Billingsgate Market and the Billingsgate Roman House and Baths are Scheduled Monuments. The Pool of London provides a visual gateway to the City of London from the Thames and is the historic port of London. Several key existing buildings are likely to become vacant in the short term and this provides an opportunity to enhance and renew the area to provide a high-quality environment for businesses, visitors and residents.

- 17.5.10. ~~The area is predominantly commercial in character and this will continue through encouragement of office-led commercial development. Existing post-war buildings could be redeveloped or refurbished to provide high quality office space or other commercial activities where these are compatible with the business City. Listed buildings and their key features should be enhanced.~~ There is potential to provide interpretation of the historic development of the area, its relationship with the original site of London Bridge and the significance of the riverside, **and to improve appreciation and enjoyment of historic interiors for all.**
- 17.5.11. **While the area will retain its strategically significant office uses, The priority should be for office use, but** there is **significant potential to enhance the area for visitors, tourists, children and young people, and those working and living in and around the City, providing cultural experiences and opportunities to spend time by and enjoy the riverside, also potential for complementary commercial and cultural uses compatible with the special interest of heritage assets and to encourage interpretation and public access to historic interiors.**
- 17.5.12. Publicly accessible retail, cultural and leisure uses will be encouraged at ground floor level throughout the Pool of London to increase vibrancy and provide active frontages. **Key open spaces in front of buildings should be enhanced and public access improved. Existing car parks should be replaced with inclusive publicly accessible open spaces and proposals to restrict public access will be resisted.** As well as delivering improvements in accessibility, vibrancy and public realm at street level, the City Corporation will encourage the provision of new, publicly accessible roof terraces and viewing areas through building redevelopment or refurbishment, whilst safeguarding existing protected views.
- 17.5.13. Redevelopment and refurbishment offer the opportunity to revisit existing servicing arrangements. Developers will be encouraged to work with adjoining landowners to deliver shared servicing strategies and to minimise movements onto Lower Thames Street.
- 17.5.14. Despite its significance, the Pool of London is relatively isolated from the rest of the City by Lower Thames Street. Working with TfL, the City Corporation will seek the improvement of existing crossing points across Lower Thames Street and the creation of new crossing points to encourage greater movement between the riverside and the rest of the City, **particularly to the Monument and Leadenhall Market further afield.** Where possible, historic routes between the river and other areas of the City will be reinstated through the redevelopment and refurbishment of buildings.
- 17.5.15. The City Corporation will work closely with TfL, landowners and developers to design and deliver substantial improvements to the public realm along the riverside walk and routes to and along Lower Thames Street. Additional greening and open space will be encouraged, with tree planting in appropriate locations. Part of the Pool of London lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm

works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.

## 17.6. Aldgate, Tower and Portsoken Key Area of Change

### Context

- 17.6.1. ~~The Aldgate, Tower and Portsoken area is positioned in the east of the City the southern edge of the area is adjacent to the Tower of London.~~
- 17.6.2. ~~The area contains a culturally diverse local population and a varied mix of uses, including offices, The Aldgate Primary School, Mansell and Middlesex Street housing estates, part of Petticoat Lane market and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.~~
- 17.6.3. ~~Major hotel and office developments are under construction on Minories. Proposals for the regeneration of the Mansell Street Estate have been considered and several large office sites currently have development potential. Petticoat Lane Market, a major tourist draw in the area, is undergoing public realm enhancement. These proposals and opportunities will impact on the area.~~
- 17.6.4. ~~The Chinese Embassy could be moving to Royal Mint Court just outside of the City boundary and this may lead to further diplomatic and commercial interest in this area. The Elizabeth Line stations at Liverpool Street in the City and at Whitechapel in Tower Hamlets are both within walking distance of Aldgate.~~

### **Strategic Policy S20: Aldgate, Tower and Portsoken**

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The Aldgate, Tower and Portsoken Key Area of Change will be promoted as a mixed-use area, which balances the ~~competing needs~~ requirements of residents, workers and visitors, by:

1. Promoting ~~office-led~~ **a greater mix of development including residential, education and hotels supported by complementary cultural and community use** development to assist in the further renewal of the area. ~~Diplomatic use and associated commercial activity will be encouraged.~~
2. Supporting and enabling residential development in appropriate locations and identifying and meeting residents' needs, utilising a range of funding sources to:
  - maximise training, education and employment opportunities for residents;
  - maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;

- create additional publicly accessible open and green space and additional accessible play space for children;
  - encourage local retail facilities; and
  - facilitate the [redevelopment potential regeneration](#) of the Mansell Street Estate [and adjacent sites](#), re-providing existing social housing, alongside additional residential units, reduced levels of air and noise pollution, community facilities and good quality open and play spaces.
3. Recognising the benefit and managing the impact of visitors to the area by:
- enhancing Petticoat Lane Market, celebrating the character and history of the area and improving the visitor experience by working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders;
  - encouraging cultural events, arts and play in public spaces;
  - permitting additional hotels on appropriate sites; and
  - managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.
4. Improving transport connections and pedestrian connectivity by:
- implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;
  - improving Aldgate Bus Station to improve air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;
  - sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;
  - encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate and between Minories and Mansell Street;
  - improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;
  - enhancing links to the riverside walkway and the Tower of London; and
  - enhancing the north-south walking route between Tower Hill and Aldgate along Vine Street.
5. Enhancing the public realm and open spaces by identifying opportunities for urban greening schemes, congestion and pollution reduction measures, particularly in the vicinity of The Aldgate School and Middlesex Street and Mansell Street Estates.

Reason for the policy

- 17.6.5. The Aldgate, Tower and Portsoken area is positioned in the east of the City the southern edge of the area is adjacent to the Tower of London.
- 17.6.6. The area contains a culturally diverse local population and a varied mix of uses, including offices, the Aldgate Primary School, Mansell and Middlesex Street housing estates and other housing, part of Petticoat Lane market, and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.
- 17.6.7. ~~Until relatively recently, Aldgate was not as attractive for business investment as other parts of the City due to traffic levels, pollution and a lack of street-level activity. The City Corporation and its partners have sought to regenerate Aldgate by stimulating beneficial redevelopment and investing in a programme of environmental and public realm enhancements.~~
- 17.6.8. While there have been significant improvements, most notably the removal of the Aldgate gyratory and the creation of Aldgate Square, the Aldgate, Tower and Portsoken area contains major through routes and parts of the area still suffer with associated congestion and poor air quality. The townscape around Tower Gateway is particularly affected by severance issues because of the road and rail networks, and there is currently little to entice visitors going to the Tower of London to explore this part of the City more widely. Tower Gateway lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.
- 17.6.9. Identifying this area as a Key Area of Change will assist in guiding further enhancement of the area during the lifetime of this Plan. There is likely to be further commercial development, especially through the refurbishment or redevelopment of older buildings. The area will also experience increased tourism activity, in line with the continued increase in tourist numbers in London as a whole.
- 17.6.10. ~~Residents living on the Mansell and Middlesex Street Estates~~The area includes places where there are have lower levels of income, employment and education, skills and training than others in the City. The ~~redemption~~ regeneration potential of the Mansell Street Estate ~~means that it could be one of the largest residential schemes in the City during the Plan period, which provides an opportunity to deliver additional housing to meet housing needs~~has the potential to provide improved housing for tenants, a more attractive environment, and increased housing in the area overall. ~~Redemption~~ Regeneration would require the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential



environment at high densities and reducing residential exposure to air and noise pollution.

- 17.6.11. Development in the Aldgate, Tower and Portsoken area should enhance its appearance and vibrancy and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities. ~~With development occurring, small pockets of land may be vacant for long periods. Meanwhile uses for such land, including carefully designed green spaces, can help improve local air quality and be utilised by the local community, visitors and workers for leisure and sporting opportunities. Policies OF3 (Temporary 'Meanwhile' Uses) and HL7 (Sport and recreation) support this approach.~~
- 17.6.12. ~~Policy S20 will be implemented through the determination of planning applications, the implementation of City Corporation strategies and public realm projects and working in partnership with a wide range of organisations.~~
- 17.6.13. ~~Key partners include the London Borough of Tower Hamlets, which is working with the City Corporation to rejuvenate Petticoat Lane Market; TfL, which manages Aldgate Bus Station, Aldgate and Tower Hill Underground Stations and Tower Gateway DLR Station; Aldgate Connect, a cross-boundary Business Improvement District (BID), which will invest £4 million in projects in the area over the period to 2025; and Historic Royal Palaces, which manages the Tower of London World Heritage Site.~~



## 17.7. City Cluster Key Area of Change

### Context

- 17.7.1. The east of the City contains a cluster of tall buildings which form part of a distinctive skyline and has the highest density of business activity in the City. It contains a concentration of offices in banking and insurance use and increasingly a wider range of technology, legal and business services. Protected views considerations allow for the construction of tall buildings on appropriate sites in the Cluster area. Recognisable and iconic tall buildings, including the Gherkin and the Leadenhall Building, have been constructed over the past 15 years and a number of significant tall buildings are under construction. Further tall buildings have been permitted but not yet commenced. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.
- 17.7.2. While increased remote working means that actual footfall may not rise in proportion to projected employment growth, the planned intensification of development in a relatively small geographic area is expected to lead to a significant increase in footfall on streets that are already crowded at peak times. The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line will bring increased pedestrian movement into the Cluster, with Bishopsgate a key pedestrian route into and through the area. This concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation. To assist delivery of transformational projects in the Cluster, the City Corporation will support the work of the Eastern Cluster Partnership in the process to become a Business Improvement District.
- 17.7.3. The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including Leadenhall Market which provides a key retail use in the heart of the Cluster and a valuable contrast to the modern development that surrounds it. The St Helen's Place Conservation Area contains the churchyards of St Helen and St Ethelburga, providing open space and respite for workers. The Cluster also forms the focus of the annual Sculpture in the City exhibition and attracts visitors to its contemporary and historic architecture.

### Strategic Policy S21: City Cluster

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The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, **including through the construction of new tall buildings**, together with complementary land uses, transport, public realm and security enhancements, by;

1. Increasing the provision of **attractive** world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers;

2. Encouraging complementary uses including leisure, culture and retail to support the primary office function in this area and providing active frontages at ground level.
3. Transforming Leadenhall Market into a seven day-week vibrant destination by encouraging culture, retail, food & beverage and other complementary uses, while preserving and enhancing its historic character and appearance.
4. Requiring the provision of new and improved open spaces at ground level, free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.
5. Delivering tall buildings on appropriate sites in line with Policy S12 (Tall buildings) ~~including on Renewal Opportunity Sites. These should make a~~ ensuring they positively contribute to the City's skyline, preserving heritage assets and their settings, taking account of the effect on the London skyline and on protected views;
6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map). Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced.
7. Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
8. Enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and prioritising pedestrian movement ~~during the daytime~~ in key streets such as St Mary Axe, Leadenhall Street and Lime Street; and creating new pedestrian routes through – and improving the accessibility of – Leadenhall Market.
9. Improving north-south connectivity for walking, wheeling and cycling through Gracechurch Street and Bishopsgate and east-west connectivity from Aldgate in the east to Bank in the west;
10. Delivering a high-quality public realm, maintaining the quality of the microclimate and increasing urban greening;
11. Activating streets, spaces and public realm at the ground floor and improving wayfinding through the streets and alleys.

12. Improving walking and cycling into and through the Cluster. Pedestrian movement should be given priority through re-allocation of road space on key routes during daytime.
13. Ensuring the provision of high-quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
14. Ensuring an area wide approach is taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high-quality public realm and environment that reflects the status of the area;
15. Introducing new approaches to freight, construction logistics and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth.; and
16. ~~Improving access to retail, leisure, cultural, health and educational facilities and services by encouraging a range of complementary land uses, ensuring active frontages at ground level and supporting activities such as ‘Sculpture in the City’.~~

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Reason for the policy

- 17.7.4. Tall buildings are an established defining feature of the City Cluster. The City Cluster has been identified as the area within the City that is most suitable for tall buildings on sites which are less constrained by view protection policies than elsewhere. The spatial extent of the Cluster and the Renewal Opportunity Sites has been informed by technical work undertaken to develop the City’s 3D digital modelling which shows that there is scope for further tall buildings, although not every site within the Cluster will be suitable. This area is designated as an area appropriate in principle for tall building development. Detailed sensitivity analysis and three-dimensional modelling shows that there is potential for further tall building development. Market demand for new office space in this area has remained high and future capacity projections indicate that a large proportion of the office development pipeline is within the City Cluster and it is expected to accommodate a significant part of the City’s future office space growth, alongside other compatible land uses.
- 17.7.5. ~~The resulting increase in floorspace and employment will inevitably~~ The planned intensification of development in a relatively small geographic area will inevitably lead to a significant increase in footfall and put more pressure on public transport, streets, open spaces and services. The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line has significantly improved public transport access into the Cluster, with Bishopsgate being a key pedestrian route into and through the area. This concentration of activity will require better walking and cycling routes, enhanced public realm, and specialised approaches to

freight and servicing, including the use of consolidation. To assist delivery of transformational projects in the Cluster, the City Corporation will continue to will support the work of the Eastern City Cluster Partnership in the process to become a Business Improvement District work with key stakeholders in the area, including the EC BID.

17.7.6. Office development within the City Cluster will be expected to deliver flexible floorspace to meet the needs of a range of occupiers and ensure the City's stock is resilient and ready to respond to changes in the market. While all forms of development should be of high-quality design, tall buildings ~~by their nature~~ have an impact on the wider London skyline. It is important that they create a coherent Cluster form and enhance the overall appearance of the Cluster on the skyline, while also having a successful relationship with the space around them at ground level and with particular regard to the Tower of London World Heritage Site, conservation areas and listed buildings. The Renewal Opportunity Sites have potential to accommodate an uplift in floorspace in new buildings of an appropriate design and height. The City Corporation will ~~continue to~~ use 3D modelling of the Cluster to ~~understand opportunities for redevelopment~~ guide future development and assess tall building proposals.

17.7.7. The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including the Grade I Listed Bevis Marks Synagogue, the oldest Synagogue in continued use in Great Britain. It is recognised that the Synagogue and its immediate setting are within the heart of an ever-changing world city and that there is pressure on sites for growth in the City Cluster. The Synagogue's immediate setting forms an intrinsic part of its significance and the broad scale and heights of buildings in the immediate setting of the Synagogue contribute to its significance. Significant changes to these buildings could potentially affect the setting and therefore significance of the Synagogue.

17.7.8. Leadenhall Market, the Grade II\* listed Principal Shopping Centre located in the heart of the City Cluster, has a long history of commerce and attracts visitors as a result of its location and architecture. Opportunities should be taken to reinvigorate Leadenhall Market into a seven days-a-week vibrant retail and cultural destination, all while celebrating its unique location and relevance to the history of London.

17.7.9. The intensification of development will have cumulative environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of pavement and public open space around the building, to ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.

17.7.10. ~~The City Corporation is working with businesses and stakeholders to address the challenges facing the City Cluster. During the Plan period improvements to key streets and spaces will create a better connected and more interesting pedestrian experience. Proposals include timed or permanent~~

~~closures of certain streets to create a pedestrian priority core, wider pavements and improved crossings, which would enable consequential public realm improvements such as more greenery and space for cultural and seasonal events. The City Corporation's City Cluster Vision provides further details about these proposals, including an indication of potential design proposals.~~

17.7.11. Area-wide security measures will be implemented, including the Anti-Terrorism Traffic Regulation Order, to reduce the risks associated with high-profile buildings and increasingly crowded streets. Developers will be required to contribute towards the design and implementation of area-wide security through s106 planning obligations proportionate to the scale of the development. Area-wide approaches to servicing and deliveries will be promoted, for instance the use of physical and/or virtual consolidation measures.

17.7.12. ~~Active frontages and complementary land uses will be encouraged to enhance vibrancy and viability, extending to weekends to diversify the City, its economy and community.~~

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## 17.8. Fleet Street and Ludgate Key Area of Change

### Context

- 17.8.1. ~~The Fleet Street area is the former home of the press but has changed in character as the newspaper and publishing industries moved away. The western extent of the area comprises the legal precincts of the Inner and Middle Temples and adjoins the Royal Courts of Justice in the City of Westminster. Fleet Street is a Principal Shopping Centre (PSC) with retail frontage along its extent, although most units are small and cater principally for the lunchtime market. The street forms the spine of the Fleet Street Conservation Area and has numerous listed buildings.~~
- 17.8.2. ~~The St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the Cathedral. Protecting and enhancing this heritage and views of St Paul's Cathedral will be a key consideration guiding future change. Fleet Street, Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London, providing iconic views of St Paul's Cathedral. Fleet Street, Ludgate Circus and Ludgate Hill are heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.~~
- 17.8.3. ~~Significant occupational change presents an opportunity to promote renewal of the area through appropriate development or refurbishment of key buildings and to improve links north and south of Fleet Street to Holborn and the River Thames. The City Corporation, in partnership with the Ministry of Justice, is developing proposals for a new court building and police facilities in the area which will complement the legal cluster and stimulate further investment in this area.~~
- 17.8.4. ~~Junction improvements at Ludgate Circus will deliver a safer pedestrian and cycling environment. Recent major development on Ludgate Hill, together with new hotel provision, has enhanced the retail offer and the quality of commercial and visitor accommodation.~~

### **Strategic Policy S22: Fleet Street and Ludgate**

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The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by:

1. Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.
2. Developing new court facilities and City of London Police station, having regard to the impact of the development on the Fleet Street Conservation Area and heritage assets and the need to ensure security of the buildings for court and police use.



3. Continuing to protect existing office use in the area, whilst encouraging office-led redevelopments including for creative, start-up and SME businesses, with a mix of complementary retail, leisure and cultural uses which enhance the area's rich heritage and culture.
4. Seeking opportunities to provide an enhanced cultural offer in the area, informed by its rich history and connections to the legal, publishing and newspaper industries, as well as opportunities to better reveal the area's heritage.
5. Allowing tall building development on appropriate sites within the defined tall building area identified on the Policies Map.
6. Providing flexible spaces and complementary uses in appropriate locations.
7. Directing further residential development to appropriate sites off principal streets to reinforce existing residential clusters, ensuring a high quality of residential amenity. Student housing may be appropriate on suitable sites.
8. Retaining retail provision within the Fleet Street PSC ~~and Retail Link~~ and encouraging greater diversity of retail, culture and leisure and the extension of retail, leisure and cultural activity into the evening and weekends, ~~whilst retaining a focus on comparison and convenience shopping in the PSC, and promote pop-up and meanwhile uses in suitable premises and sites.~~
9. Enhancing the public realm and open spaces by:
  - improving and increasing the capacity and accessibility of pavements along Fleet Street and Ludgate Hill, junction improvements at Ludgate Circus and more spaces for seating in the area;
  - enhancing the courts and alleyways that lead off Fleet Street and Ludgate Hill and churchyards that are located in the area, helping to better reveal them through sensitive wayfinding, and seeking opportunities to improve safety through enhanced lighting and activation;
  - enhancing the immediate setting of St. Paul's Cathedral through high quality development and public realm enhancements ~~including a world square~~; and
  - delivering additional greening on streets and open spaces and encouraging the greening of buildings, where compatible with heritage considerations.

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#### Reason for the policy

- 17.8.5. ~~Junction improvements at Ludgate Circus will deliver a safer pedestrian and cycling environment. Recent major development on Ludgate Hill, together with new hotel provision, has enhanced the retail offer and the quality of commercial and visitor accommodation.~~



- 17.8.6. Fleet Street is an iconic location with a name synonymous with the UK newspaper and publishing industry. However, the newspapers that occupied Fleet Street have moved out, and the area is home to a broad range of ~~to be replaced with~~ commercial office occupiers.
- 17.8.7. The area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster, and this will be enhanced with the delivery of the new court building and police facilities at Salisbury Square, which is being developed by the City Corporation in partnership with the Ministry of Justice to provide a flagship court facility for London to tackle cybercrime, fraud and economic crime. The area is identified in the London Plan as a CAZ Legal Cluster and its important and varied legal functions will be supported and enhanced through this City Plan.
- 17.8.8. ~~The City Corporation in partnership with the Ministry of Justice has proposed a new flagship court facility for London to tackle cybercrime, fraud and economic crime. The proposed new court and police station will need to be consistent with the requirement to protect and enhance heritage assets in the Fleet Street Conservation Area and the protection of retail uses within the Fleet Street PSC, whilst addressing the need for security and secure access.~~
- 17.8.9. The Fleet Street area has a strong cultural offer with attractions ranging from Dr Johnson's House to the St Bride's Institute, the Bridewell Theatre and the historic churches of St Brides, St Dunstan's in the West and Temple Church. These attractions help draw visitors to the area, which support the PSC, and opportunities should be sought to enrich the contribution these buildings and organisations make to the life of the Fleet Street area.
- 17.8.10. Ludgate Circus is a major junction between Fleet Street, Ludgate Hill and Farringdon Street. The western side lies within the Fleet Street PSC, ~~whilst the eastern side is within an identified Retail Link.~~ Ludgate Hill forms the principal approach to St Paul's Cathedral and a key element of the royal and state processional route. Major commercial development at Old Bailey has enhanced the office and retail offer on this street and further hotel development could support the City's growing visitor economy.
- 17.8.11. The Key Area of Change contains a mix of large modern office developments and smaller scale historic buildings on small plots more suitable for SME use. ~~Several major occupiers have vacated office buildings on Fleet Street in recent years, providing opportunities for beneficial change though~~ The City-wide presumption in favour of protecting office uses will continue to apply and the area's commercial office focus will remain. A particular focus for future office development will be the identified tall building area, within which tall buildings will be permitted on appropriate sites, having regard to heritage and views constraints ~~may limit opportunities for significant increases in floorspace.~~
- 17.8.12. There may be potential for partnership working between occupiers in the area to deliver improvements and more flexible use of some buildings whilst

retaining a predominance of commercial uses which complement the City's business focus. To assist with the development of a coherent vision for the area, the City Corporation will support the work of the Fleet Street Quarter [Partnership in the process to become a Business Improvement District BID](#). The [Partnership BID](#) is keen to explore ways in which Fleet Street can act as a vibrant spine for the area, while improving its links with other parts of the City including the area up to High Holborn and access to the riverside.

- 17.8.13. The area contains an existing residential cluster to the north of Fleet Street, with a number of upper floors of buildings on Fleet Street itself converted to residential in recent years. South of Ludgate Hill is the established residential [and commercial](#) area of Carter Lane. Fleet Street, Ludgate Hill and Carter Lane suffer noise from commercial and retail activities, while traffic contributes to poor air quality along parts of Fleet Street and Ludgate Hill. To ensure a high quality of residential amenity, new residential development in this area will be directed to sites away from principal streets, so that the potential for noise disturbance and exposure to poor air quality can be minimised.
- 17.8.14. The PSC is an important aspect of Fleet Street that provides vibrancy along its length, [however the PSC is under-performing and has the potential to diversify](#). To strengthen the PSC, it should continue to [focus on provide](#) comparison and convenience shopping, but also look to extend its retail offer into the evenings and weekends [and provide a broader range of retail and leisure uses](#). [The Retail Link on](#) Ludgate Hill provides a key route between Fleet Street and Cheapside PSC and [the extension of the Fleet Street PSC further development for retail and town centre uses](#) is appropriate along this route.
- 17.8.15. The key streets within the area offer a poor public realm, being heavily trafficked with narrow footways that are congested particularly during peak hours and lunch times. There is limited greenery along Fleet Street, Ludgate Circus and Ludgate Hill. Additional planting will need to consider the impact on the established character of the area and on key views of St Paul's Cathedral along the processional route. There is scope to enhance the public realm and [achieve a better balance between motor vehicles and to prioritise](#) pedestrians, including through the widening of pavements. Improvements to the public realm will deliver benefits to the area as well as improve air quality and provide more quiet areas in the network of courts and alleyways behind Fleet Street and Ludgate Hill. St Bride's Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement. Other parts of the area where the public realm and street environment offer scope for improvement include Carter Lane and the Whitefriars area to the south of [Fleetbank House Salisbury Square](#).
- 17.8.16. The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960s. The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the

approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and de-cluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral to enhance the setting of this iconic building.

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## 17.9. Smithfield and Barbican Key Area of Change

### Context

17.9.1. ~~The Smithfield and Barbican Key Area of Change is a vibrant, mixed use area that contains:~~

- ~~• The highest concentration of residential units in the City, including the Barbican and Golden Lane estates and Smithfield (principally Barts Square);~~
- ~~• A cultural quarter, known as Culture Mile focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic cultural area;~~
- ~~• St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre.~~
- ~~• Smithfield Market, London's major wholesale meat market.~~
- ~~• A mixed office stock and occupier profile, ranging from large corporate headquarters to buildings suitable for SMEs, creative enterprises and start-ups.~~
- ~~• Many heritage assets of national significance including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, gardens and spaces which enhance its special character.~~

17.9.2. ~~This part of the City will undergo significant change and development over the life of the Local Plan with the delivery of the Culture Mile initiative, including the proposed relocation of the Museum of London to Smithfield and the potential development of a new Centre for Music on the site of the existing Museum of London.~~

17.9.3. ~~Smithfield Market may move from its current location in this period and alternative uses would then need to be found for the historic market buildings. Policy S25 supports the continued presence of Smithfield Market in the area in the short to medium term, while providing broad guidance on potential future uses if the Market moves beyond the Plan period.~~

17.9.4. ~~The opening of the Elizabeth Line, with a station entrance at Lindsey Street and another on Moorgate, will significantly increase public transport provision to the area and result in increased pedestrian flows to and from these stations and the rest of the City.~~

## Strategic Policy S23: Smithfield and Barbican

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The City Corporation will improve the Smithfield and Barbican area by:

1. ~~implementing the Culture Mile initiative~~, encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements ~~through the Culture Mile Look and Feel Strategy~~;
2. ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, ~~Golden Lane~~ and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;
3. ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;
4. supporting and enabling residential development in appropriate locations;
5. identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;
6. making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;
7. seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;
8. requiring improvements to pedestrian and cycle routes for all within and through the north of the City;
9. supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;
10. supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;
11. encouraging a diverse leisure, retail, food and beverage offer, particularly along routes between the London Museum and the Barbican;
12. encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and
13. enhancing the special character of the area through sensitive change.

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### Reason for the policy

17.9.5. The Smithfield and Barbican Key Area of Change is a vibrant, mixed use area that contains:

- The highest concentration of residential units in the City, including the Barbican and Golden Lane estates and Smithfield (principally Barts Square);
- A cultural quarter ~~known as Culture Mile~~ focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic

cultural area, which will be enhanced with the relocation and reopening of the London Museum;

- St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre;
- Smithfield Market, London's major wholesale meat market, which is expected to relocate in the coming years;
- A mixed office stock and occupier profile, ranging from large corporate headquarters to buildings suitable for SMEs, creative enterprises and start-ups;
- Many heritage assets of national significance including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, and gardens and spaces that enhance its special character.

17.9.6. This part of the City will undergo significant change and development over the life of the Local Plan with the ~~delivery of the Culture Mile initiative, including the proposed~~ relocation of the ~~Museum of London~~ **London Museum** to Smithfield and the current operations of Smithfield Market ~~and the potential development of a new Centre for Music on the site of the existing Museum of London.~~

17.9.7. **A Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by the City Corporation on 18 July 2023.**

17.9.8. ~~The Smithfield and Barbican area contains a very diverse range of uses, including commercial offices, retail, market, cultural, hospital and residential, which attract large numbers of people to the area. During the life of this Plan, the relocation of the Museum of London from London Wall to Smithfield would release its current site for the potential development of a Centre for Music. The City Corporation has taken a decision in principle, subject to feasibility and consultation, to co-locate its 3 wholesale markets to a new location which could release the existing Smithfield Market buildings for alternative use. The Culture Mile initiative~~ **City Corporation** will see **enable** a range of cultural and artistic activities **implemented** throughout the area. Together these changes will attract a substantial increase in visitors to this part of the City and enhance the area's attractiveness for businesses, residents and visitors. The opening of the Elizabeth Line, linking to national rail and tube lines, **will make has made** this area one of the most accessible locations by public transport in the country ~~helping deliver the expected increase in visitors.~~

17.9.9. **The Barbican complex contains an internationally recognised cultural area and the City's largest concentration of residential units. Barbican Listed Building Management Guidelines have been produced, which seek to protect the special architectural and historic interest of the buildings and their setting.**

17.9.10. Delivery of this policy will be supported by implementation of public realm enhancement and transportation schemes and greater activation of streets, providing improved amenity, design and movement, for the benefit of workers,



residents and visitors. The design of new buildings and spaces should provide greater pedestrian permeability, ensuring that the area is able to accommodate and manage increased volumes of people and activities. A particular concern in this area is the need to improve air quality to protect the health of the public, including in particular the comparatively large resident population and hospital patients. ~~The City Corporation's Transport Strategy proposes to introduce a local Zero Emission Zone covering Barbican and Golden Lane by 2022. An interim 2-way Zero Emission Street is being implemented at Beech Street in 2020 under an Experimental Traffic Order.~~

17.9.11. The Citigen plant, located immediately north of the City on Charterhouse Street in Islington, is providing heating and cooling to buildings within the City. Subject to future progress on decarbonisation, Citigen offers the potential of low carbon heating and cooling to buildings in this part of the City and new development should, where feasible, be designed to enable connection to the network.

### **Culture Mile**

~~7.8.10 Culture Mile is a unique collection of arts, cultural and educational organisations and creative enterprises in the north of the City which has been created through a partnership of the City of London Corporation, the Barbican Arts Centre, Guildhall School of Music and Drama, the London Symphony Orchestra and the Museum of London. Culture Mile runs from Farringdon to Moorgate on the east-west axis and from the Golden Lane estate to south of London Wall on its north-south axis. The Culture Mile area has been identified as a Strategic Cultural Area in the London Plan.~~

### **Strategic Policy S24: Culture Mile Implementation**

~~The City Corporation will promote and protect Culture Mile as the City's main cultural centre and world class cultural destination, by encouraging and supporting:~~

- ~~• the proposed relocation of the Museum of London to Smithfield;~~
- ~~• the potential development of a new Centre for Music on the current site of the Museum of London on London Wall;~~
- ~~• shared working with the London Borough of Islington to ensure the change and development around Culture Mile benefits local communities through improved access to and experience of cultural enrichment, education, skills and employment opportunities;~~
- ~~• provision of cultural facilities and uses within buildings and the public realm, where appropriate, and where the amenity of surrounding uses is not significantly compromised;~~
- ~~• supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;~~



- ~~● encouraging a diverse leisure, retail, food and beverage offer, particularly along the Culture Spine key route;~~
- ~~● encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists;~~
- ~~● strengthening of routes, way finding, lighting and signage throughout the area and the links with the rest of the City in a co-ordinated manner;~~
- ~~● public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile and to provide a relevant identity for Culture Mile; and~~
- ~~● safeguarding cultural uses such as churches and museums.~~

### Reason for the policy

~~17.9.12. Culture Mile has been identified to guide cultural and creative activity within this part of the City, including potential development in the area during the life of the Plan. It recognises and promotes the City's cultural attractions to a wider audience. The opening of Elizabeth Line stations will stimulate further change in the area.~~

~~17.9.13. An important element of the emerging proposals for Culture Mile is the identification of movement spines, including a key east-west route from the proposed Museum of London site, along Long Lane and Beech Street. Significant improvements to the public realm and traffic reduction measures, particularly along Beech Street, will be progressed to support increased pedestrian flows and the provision of cultural activity on street. Public realm improvements will be sought as development opportunities arise. Expansion of the area's cultural offer, including within established institutions, will require the provision of appropriate transport infrastructure into and through the area.~~

17.9.14. To deliver its ambitions for [Culture Mile](#) [the Smithfield and Barbican Area](#), the City Corporation is aiming to create a distinctive look and feel for the area, which allows for the provision of art installations and activity in the public realm [in appropriate locations](#) and addresses the requirements for advertising and event promotion. Further planning guidance will be provided.

17.9.15. The City Corporation and partners have published research that highlights the contribution made by Creative industries [make a significant contribution in and around Culture Mile](#) to the City's economy, [particularly within the Smithfield and Barbican area](#). And the potential for growth of this sector as part of the Culture Mile initiative. The research identified the Significant social and economic value ~~that~~ can be derived from the growth of creative enterprises [and the City Corporation will continue to encourage and support their growth within the Key Area of Change, including through the delivery of meanwhile uses in vacant and under-used premises.](#) and made four key recommendations which are addressed in part through this policy:

- ~~Create a strong sense of place;~~
- ~~Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space;~~
- ~~Attract talent, create new jobs and support social mobility; and~~
- ~~Drive inward investment.~~

### ~~Policy SB1: Culture Mile Impacts~~

~~The City Corporation will protect the amenity of residents, workers and occupiers and conserve and enhance the character of designated and non-designated heritage assets by: —~~

~~considering the impact of noise-generating uses, particularly night-time activities on residents and business occupiers when granting planning permissions;~~

~~requiring the installation of noise mitigation measures in developments and spaces to minimise the potential for disruption and anti-social behaviour where appropriate;~~

~~managing the highway network to minimise traffic disturbance and to maintain access to existing premises for essential servicing;~~

~~requiring development and cultural activities to preserve and enhance historic buildings and their settings, historic structures and spaces and conservation areas;~~

~~allowing suitable architectural lighting of buildings and spaces, consistent with their architectural, cultural and heritage status, the amenity of occupiers and the requirements of Culture Mile; and~~

~~ensuring public realm and open space improvements, and temporary and pop-up stalls and events do not impede the efficient flow of people and essential vehicles or detrimentally impact on the conservation area.~~

### ~~Reason for the policy~~

~~Culture Mile will be a vibrant place with large numbers of people and significant activity during the day and into the evening. This level of activity will impact on residents and workers as well as the movement of people and traffic and therefore a range of mitigation measures need to be considered alongside project implementation.~~

~~The London Borough of Islington has designated the Clerkenwell and Farringdon area as a Cultural Quarter, where development of cultural and creative uses should be focused. It also proposes introducing a new Local Shopping Area extending from Farringdon Station to Smithfield Market along Cowcross Street, which will support development of retail and food, drink and entertainment uses. While these initiatives will complement the~~

~~Culture Mile, cross-boundary impacts may arise from cultural and night-time economy uses on either side of the boundary between the City and Islington. Proposals for such uses in Culture Mile will be expected to mitigate any cross-boundary impacts as well as any impacts on City residents and businesses.~~

~~Policy S9 (Vehicular Transport and Servicing) addresses disturbance from vehicle movements as well as disruption to servicing arrangements. Policies HL3 (Noise and Light Pollution) and CV4 (Evening and Night-Time Economy) outline measures to help protect residents from noise and light disturbance and the night-time economy. Further guidance is provided in the City Corporation's Noise Strategy, Lighting Strategy and Statement of Licencing Policy.~~

## Smithfield

- 17.9.16. ~~The Smithfield area has over centuries developed a distinctive mixed-use character and townscape and contains the designated Smithfield Conservation Area and numerous important listed buildings. It is characterised by the wholesale Smithfield Market, the General Market and St Bartholomew's Hospital complex. The hospital is a leading internationally renowned teaching hospital and centre for excellence which includes specialist cardiac and heart centres.~~
- 17.9.17. ~~The Smithfield area also supports a range of other land uses, including residential, offices, retail, leisure, churches and night-time entertainment. The City Corporation has taken a decision to co-locate its three wholesale markets on a single site and Smithfield Market will relocate to this new wholesale market site during the Plan period. Smithfield is home to a significant number of cultural organisations and creative enterprises with links to Camden and Islington.~~

### **Strategic Policy S254: Smithfield**

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The City Corporation will protect and enhance the distinctive mixed-use and historic character of Smithfield by:

1. supporting the continued presence of St. Bartholomew's Hospital;
2. supporting the continued presence of Smithfield Market in the short to medium term;
3. encouraging the future sensitive re-use of the Smithfield Market buildings, should the market relocate, requiring a world class design solution **which that** delivers a mix of uses **that celebrate and are** appropriate to its sensitive heritage character, **and that provide inclusive public access to the buildings;**
4. supporting the **proposed** relocation of the Museum of London to Smithfield;
5. further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses;
6. managing the particular challenges which result from the late evening, 7 day a week character of the area;

7. resisting residential development adjacent to the current market site or future Museum of London in order to minimise potential adverse impacts on residential amenity;
  8. promoting a retail and leisure economy that complements and contributes to the changing uses in the area and supports the establishment of Smithfield as a leisure destination;
  9. ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents; and
  10. providing for, and supporting, improved pedestrian permeability and the creation of new and enhanced public realm across the area to accommodate cultural activity and increased pedestrian flows arising from the Elizabeth Line and potential new uses in the existing market buildings.
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#### Reason for the policy

- 17.9.18. The proposed relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line and development encouragement of Culture Mile cultural and visitor activities, will result in a significant increase in pedestrian and visitor numbers in this Key Area of Change, which will place further pressure on the public realm and on important local open spaces such as Smithfield Rotunda Garden, which is Grade II listed. Improvements to the public realm will be required to ensure that increased movement can be accommodated. At the same time, it is important that new activities do not adversely affect the amenity of existing business and residents, the continued operation of St Bartholomew's Hospital or impact on the area's historic significance and mixed-use character. The wider area has a mix of uses, including the hospital, Livery Halls, open spaces, pubs, shops and restaurants, offices and residential use.
- 17.9.19. The City Corporation has carried out a strategic review of its 3three wholesale markets, Smithfield, Billingsgate and New Spitalfields. A decision has been taken in principle, subject to feasibility and consultation, to co-locate the wholesale markets on a single site. As a result, it is possible expected that Smithfield Market may will move from its current location in the City at some time in the latter part of during the Plan period. The Local City Plan therefore continues to protect the operation of the Market in Smithfield, but also provides guidance requiring future potential uses of the market buildings to maintain the historic character of the existing Grade II\* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile cultural and leisure activity and is fully inclusive whilst protecting local amenity. Inclusive, welcoming public access to the buildings of Smithfield Market will be an important component of future uses and designs should consider how these spaces can be better revealed, with routes through

the buildings including Buyer's Walk, the central spine running through the buildings. If the decision in principle to co-locate the wholesale markets on a new site is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Smithfield Market buildings.

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## 17.10. Liverpool Street Key Area of Change

### Context

- 17.10.1. ~~The Liverpool Street area stretches from the City boundary with Shoreditch in the north east, to Finsbury Circus in the west and the City Cluster to the south. It provides a key route from Liverpool Street Station to the Barbican and Culture Mile. It is an area that will experience extensive change with the opening of the Elizabeth Line and the completion of significant new office floorspace and retail and leisure facilities which are currently under construction or progressing through the planning process.~~
- 17.10.2. ~~Liverpool Street is the gateway to the City for East Anglia — as well as being a multi-line tube station. The Elizabeth Line will provide fast easy access from the west including from the West End, Heathrow and beyond, linked to Moorgate station which already serves stations to the north of London. The increase in passengers and pedestrians in this area facilitated by the Elizabeth Line brings challenges and opportunities: challenges in terms of additional people on already heavily used streets; opportunities in terms of increased accessibility for businesses and greater demand for the growing retail and leisure sector.~~
- 17.10.3. ~~The area is a gateway to ‘Tech City’ focussed on Old Street, Shoreditch and Spitalfields, and there are further opportunities to develop tech-related activity in the City and its fringes. Facilitating office space suitable for such businesses affordable, collaborative, and available for short periods will enhance the local office eco-system and strengthen the City’s reputation as a centre for incubators, start-ups and the tech and Fintech sectors.~~

### Strategic Policy S265: Liverpool Street

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The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by good public transport accessibility, the opening of the Elizabeth Line, ~~and~~ restoration of Finsbury Circus and the redevelopment and refurbishment of Broadgate by:

1. ~~accommodating the increased footfall by maintaining and enhancing walking routes within, to and from the area, including routes to the City Cluster,~~ ~~and~~ improving wayfinding;
2. providing active frontages ~~and clear~~ at the ground floor level to animate and add vibrancy to the area;
3. ~~and clear~~ providing a welcoming visitor experience with improved wayfinding and signposting that reflects the area’s position as a key gateway to ~~the Culture Mile~~ the City;

4. encouraging the development of flexible ~~and collaborative~~ office space to meet the needs of future offices occupiers and potential start-ups, allowing for business growth in a variety of sectors and the development of the tech and fintech eco-system;
5. ~~supporting~~ encouraging development that provides opportunities for collaborative working ~~facilitating linkages~~ between businesses in this area, Tech City, the creative sector and educational institutions to create an attractive and vibrant business eco-system
6. supporting ~~additional~~ retail development ~~provision~~ in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends, ~~supporting and enhancing the night-time economy, diversifying the retail and leisure offer and creating a shopping and leisure destination to draw a diverse range of audiences while managing the potential impacts associated with the night-time economy;~~
7. enhancing the public realm and walking routes to Petticoat Lane Market, working in partnership with the London Borough of Tower Hamlets, and the links to Whitecross Street and Spitalfields markets;
8. delivering a high-quality public realm with additional publicly accessible open space and increased greenery ~~alongside to deliver biodiversity improvements;~~
9. Improving pedestrian routes in and around the bus station and enhancing the user experience through provision of seating, legible wayfinding and ease of access;
10. Improving the overall user experience and supporting improvements to the accessibility and capacity of Liverpool Street Station, including enhancing step free access and improving entry points; and
11. improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including ~~the Barbican,~~ Tech City and the City Cluster.

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Reason for the policy

- 17.10.4. The Liverpool Street area is a dynamic part of the City of London, and home to one of London's busiest transport hubs and increasingly a destination for leisure as well as work. The Liverpool Street area is undergoing significant transformation ~~through~~. This has happened through the recent arrival of the Elizabeth Line ~~and significant intensification in the City Cluster to the south;~~ the large-scale redevelopment and refurbishment of



Broadgate and associated public realm improvements; and the development of several new offices, provision of more and retail and leisure facilities in the Liverpool Street area and in the nearby City Cluster that are either under construction or planned floorspace. improvements in surrounding streets, the opening of the Elizabeth Line. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. Broadgate is currently developing a more outward looking character and this is expected to continue, alongside further improvements to permeability.

17.10.5. Where suitable funding is available, the City Corporation will support such change through delivery of world class public realm and improvement to streets and pedestrian routes, including additional pedestrian priority and new pedestrian routes to maximise permeability, where appropriate. The Transport Strategy indicates that the area around Moorgate and Liverpool Street stations will be prioritised for improvements, together with the routes between these stations and key destinations such as Culture Mile and the City Cluster. Where feasible, additional urban greening and the creation of green urban spaces will be encouraged.

17.10.6. The City Corporation will work with relevant partners such as including TfL, Network Rail, and train operators and landowners to promote improvements to the accessibility of and facilities of provided in Liverpool Street Station and the surrounding area. This may include enhancing step free access, improving entry points and reviewing bus interchange, together with any potential future improvements to operational capacity at the station.

17.10.7. Alongside these changes, encouragement will be given to the provision of space suitable for incubators, start-ups, technology-based companies and creative industries, including the provision of flexible accommodation suitable for these sectors and growing businesses. This will reinforce established links between the area and the Old Street/Shoreditch/Spitalfields Tech City area, and will exploit the opportunities presented by Culture Mile to enhance the creative ecology of this part of the City. Collaboration will be encouraged between creative industries in Culture Mile and emerging tech industries. The area also plays an important role supporting adjacent night-time economy areas at Shoreditch and Brick Lane, including providing public transport access via the night tube.

# 18. Implementation

## 18.1. Planning Contributions

### Community Infrastructure Levy (CIL)

18.1.1. The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) set out the legislative and regulatory basis for the CIL. They provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the [Local City](#) Plan. CIL is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

### Planning Obligations

18.1.2. CIL Regulations indicate that planning obligations may only constitute a reason for granting permission if the planning obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

18.1.3. Planning obligations are legal agreements linked to planning permissions that regulate the way a development is undertaken, and they are used where it is not possible to regulate the permission by means of a condition. They may be in the form of in-kind benefits or a financial contribution and may be used to prescribe the nature of a development, compensate for loss or damage created by a development, or mitigate the impacts associated with the development. The level of any obligation is subject to consideration of its impact on the viability of the development proposed.

### **Strategic Policy S267: Planning Contributions**

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The City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development:

1. Requiring contributions through the Community Infrastructure Levy to:
  - assist in the delivery of the infrastructure necessary to support implementation of the [Local City](#) Plan and the City's Transport Strategy; and

- contribute towards the costs of Crossrail, or other strategic infrastructure, in accordance with the provisions of the Mayor of London Community Infrastructure Levy 2.
2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
    - site specific mitigation meeting statutory tests;
    - affordable housing;
    - training, skills and job brokerage;
    - carbon offsetting;
    - **cultural provision;**
    - **Highways and public realm enhancements including commuted sums for maintenance;**
    - local procurement in the City and neighbouring boroughs; and
    - measures to enhance area-wide security, where appropriate.
  3. Use of the Vacant Building Credit is not considered to be appropriate in the City of London.

#### Reason for the policy

18.1.4. The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL) to help local infrastructure keep pace with the demands of development and attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to ensure proposals are acceptable.

#### How the policy works

18.1.5. The City Corporation has adopted a CIL Charging Schedule and ~~will prepare an~~ **publishes an annual** Infrastructure Funding Statement setting out the types of infrastructure or infrastructure projects that may be funded in part or in whole by CIL.

18.1.6. In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security measures in the City Cluster, in line with the policies set out in this Plan. Planning obligations will also be negotiated to deliver affordable housing, the provision of training and skills programmes, ~~and~~ carbon offsetting **and, where appropriate, contributions towards cultural provision**. Specific requirements are set out in

other policies within this Plan, particularly Policies S1, S3, [VT1](#) and DE1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

18.1.7. Where required, the City Corporation will seek, via s106 planning obligations, Section 278 Agreements with developers to ensure that highway works necessary to make a development acceptable are funded by the developer and implemented by the highway authority.

18.1.8. Further detail on planning obligations is set out in the Planning Obligations [SPD Supplementary Planning Document](#) and in the s106 Standard Template which is published on the City Corporation's website.

18.1.9. The Vacant Building Credit is set out in national planning policy and is intended to provide an incentive to bring forward brownfield sites for development. The high cost of land in the City of London, together with high levels of demand for commercial and residential development, mean that additional incentives are not required to encourage brownfield sites to come forward for development. The use of Vacant Building Credit is therefore not considered to be appropriate within the City of London.

### **Crossrail**

18.1.10. The Mayor of London Community Infrastructure Levy 2 (CIL2) was implemented from 1 April 2019. It requires development across London to make a contribution towards the funding of Crossrail 1 and Crossrail 2. The Mayor's CIL2 sets a charging rate for all development in London, with a higher charging rate for office, retail and hotel development in Central London, including in the City of London. The Mayor's CIL2 is payable in addition to the City of London CIL.

### **Policy PC1: Viability Assessments**

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1. Development proposals must take full account of the policy requirements set out in this Plan and the London Plan, including financial and other requirements under the Mayoral and City of London Community Infrastructure Levy and s106 planning obligations.
2. Exceptionally, even where policy requirements have been taken into account, applicants may consider that these requirements cannot be delivered in full without adversely affecting the overall viability of a development. In these circumstances, proposals must be supported by a scheme specific viability assessment.
3. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a

site and/or building will not be a relevant justification for not meeting Development Plan requirements.

4. Viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. If an assessment is redacted, an executive summary will be made public.
5. The City Corporation will seek independent verification of submitted viability assessments, with the cost of verification being met by the applicant.
6. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.

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#### Reason for the policy

18.1.11. Delivery of the [Local City](#) Plan and the London Plan requires developers to make contributions towards infrastructure and affordable housing provision through the CIL and s106 planning obligations. Developers must take into account the full cost of meeting development plan requirements when purchasing sites or buildings and in the design of schemes. A whole plan viability assessment has been undertaken in the preparation of this Plan demonstrating that [as at March 2020](#) implementation of the policies should not adversely impact on the viability of development in the City of London. Exceptionally, there may be circumstances where a developer considers that meeting development plan requirements in full cannot be delivered without adversely impacting on the viability of a development. In such circumstances, the City Corporation will require a site-specific viability assessment to be submitted in support of the proposed lower level of contributions.

#### How the policy works

18.1.12. Where viability assessments are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability assessments set out in national Planning Practice Guidance. In particular, assessments must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the [Local City](#) Plan and the London Plan. The actual price paid for land will not be a relevant justification for failing to meet the policies in the development plan.

18.1.13. The City Corporation will review viability assessments against the requirements in the [Local City](#) Plan and London Plan and, where necessary, will seek independent verification of submitted assessments from suitably qualified

consultants who have experience of the development market in central London. Verification of viability assessments will consider whether appropriate costs, values and risk rates have been utilised which reflect the ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.

- 18.1.14. The City Corporation will make all viability assessments submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability assessment should remain confidential in whole or in part, they should provide justification to the City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability assessment public. Where the City Corporation considers that an assessment should remain confidential in whole, or in part, it will keep the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.
- 18.1.15. Where the City Corporation agrees that a development cannot meet the full policy requirements for CIL and s106 planning obligations at the date of commencement, but that there are other policy considerations which would nevertheless justify approval of the scheme despite this non-compliance, the Corporation will normally require that a review mechanism be included within any s106 planning obligation, with a review of the viability information required at a later stage in the development, or upon occupation. In determining the appropriate mechanism, the City Corporation will have regard to national Planning Practice Guidance, the London Plan and the Mayor of London's Affordable Housing and Viability [SPG Supplementary Planning Guidance](#). Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.
- 18.1.16. Policy S3 Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.



## 18.2. Monitoring

- 18.2.1. The [Local City](#) Plan was prepared in the context of the most up to date information available. A range of projections and potential future scenarios were considered for each policy area. However, circumstances may change and monitoring of [Local City](#) Plan policies is essential to determine the extent to which the policies are delivering the [Local City](#) Plan vision, strategic objectives and spatial strategy.
- 18.2.2. The City Corporation will prepare and publish at least annually a range of [Local City](#) Plan monitoring reports, which measure and evaluate progress towards meeting the Plan objectives across a range of policy areas. Policies monitored will include offices; housing; hotels; tall buildings; protected views; sustainability; waste; open spaces and green infrastructure. The City Corporation will also periodically (annually) review progress against the programme of infrastructure delivery set out in the Infrastructure Delivery Plan.
- 18.2.3. The City Corporation is required to review the [Local City](#) Plan at least every five years from the date of adoption to determine whether it needs to be updated. Data and trends identified in the [Local City](#) Plan monitoring reports may indicate the need for an earlier partial or full review of the adopted Plan. ~~The emergence of new trends resulting from the Covid-19 pandemic and its aftermath will be regularly monitored for their policy implications.~~
- 18.2.4. As mentioned in the introduction to this Plan, the Government is pursuing a planning reform agenda which includes proposals to radically change the format and content of local plans. These reforms, if enacted, will be a key factor in determining the timing and scope of the next review of the City of London's [Local City](#) Plan.



# Appendices and Glossary

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# Appendix 2 – Historic England Advice Note 7 Selection Criteria

This table is taken from Historic England Advice Note 7: Local Heritage Listing, and sets out commonly applied selection criteria for assessing the suitability of heritage assets for local heritage listing.

Criterion	Description
<b>Age</b>	The age of an asset may be an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions.
<b>Rarity</b>	Appropriate for all assets, as judged against local characteristics
<b>Aesthetic Interest</b>	The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics.
<b>Group Value</b>	Groupings of assets with a clear visual design or historic relationship.
<b>Archaeological Interest</b>	The local heritage asset may provide evidence about past human activity in the locality, which may be archaeological – that is in the form of buried remains – but may also be revealed in the structure of buildings or in a manmade landscape. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
<b>Archival Interest</b>	The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record.
<b>Historical Association</b>	The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures. <b>Blue Plaque</b> and other similar schemes may be relevant.
<b>Designed Landscape Interest</b>	The interest attached to locally important historic designed landscapes, parks and gardens which may relate to their design or social history. This may complement a <b>local green space designation</b> , which provides special protection against development for green areas of particular importance to local communities for their current use.
<b>Landmark Status</b>	An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene.
<b>Social and Communal Value</b>	Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence, sometimes residing in intangible aspects of heritage, contributing to the 'collective memory' of a place.

Table 2: Commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list (source: Historic England)

# Glossary

Explanation of terms used in the City of London [Local City Plan](#).

\* Terms explained elsewhere in the glossary are marked with an asterisk.

## **Accelerator office space**

An office location which provides mentorship, advice, and resources to help start-ups succeed and grow rapidly, normally let on a short-term basis.

## **Active frontage**

~~A ground frontage providing active visual engagement at street level to improve vitality and safety to the public realm.~~

~~Fronts of buildings that facilitate visual and physical permeability.~~

## **Active frontage use**

~~A definition used in this plan for those uses that fall within use classes E(a)-(e), where they have an active frontage. These use classes include shops, cafes and restaurants, and services for use by the general public such as hairdressers, banks and building societies, shoe repair and dry cleaning, gyms, and health centres. Pubs and other community and cultural uses may also be active frontage uses, where they are frequented by members of the public.~~

## **Affordable housing**

Affordable housing is defined primarily by affordability and not by tenure. It comprises 'social rented housing', 'affordable rented housing' and 'intermediate housing', provided to eligible households whose needs are not met by the market. Social rented housing is at rents no greater than target rents set by government for local authority, Registered Social Landlords\* (RSL) and cooperative tenants. Affordable rented housing has the same characteristics as social housing but is offered at up to 80% of local market rentals (including service charges, where applicable). Intermediate housing is housing for sale and rent where costs are above target rents for social rented housing but are at least 20% below local market levels and are affordable by households on moderate incomes. Intermediate housing can include shared equity (shared ownership and equity loans), starter homes, discounted market sales housing and other sub-market rented and key worker provision.

## **Affordable workspace**

Workspace that is provided at rents maintained below the market rate for that space for a special social, cultural, or economic development purpose.

## **Agent of Change**

The principle that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.

## **Air Quality Impact Assessment**

An assessment of the impact of a development on the levels of certain pollutants in the local area, which could include: a description of baseline conditions and how these could change; relevant air quality concerns; the assessment methods to be adopted and any requirements around verification of modelling air quality; sensitive locations; the basis for assessing impact and determining the significance of an impact; construction phase impact; and/or acceptable mitigation measures.

## **Air Quality Neutral**

Assessment of air quality against benchmarks set by the Mayor of London through his Sustainable Design and Construction SPD 2014. Developments that do not exceed these benchmarks will be considered to avoid any increase in NOx and PM emissions across London as a whole and therefore be 'air quality neutral'.

## **Apart-hotel**

Accommodation for short or medium-term stays that generally provide more amenities for daily use (such as a small kitchenette) than standard hotel accommodation. They have a reception area where customers can access services without pre-booking and are available on a nightly basis without a deposit being required against damages.

## **Assets of Community Value (ACV)**

[A building or other land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future. ACVs must be approved by the local authority.](#)

## **Biodiverse green roofs**

A biodiverse green roof should include a varied substrate depth, planted and or seeded with a wide range of wildflowers (sedums can be added). A biodiverse green roof should have a sufficient depth of between 80 - 150mm.

## **Biodiversity**

The variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

## **Biodiversity Action Plan ([BAP](#))**

The Biodiversity Action Plan ([BAP](#)) provides a framework to ensure all legislative requirements relating to the management of green spaces are taken into consideration at all times and both identifies and prioritises actions for biodiversity at a local level.

## **[Biodiversity Net Gain \(BNG\)](#)**

**[Biodiversity net gain is a statutory requirement which applies to new development. It is a way of making sure the habitat for wildlife on a site is in a better state after the development than it was before development.](#)**

## **BREEAM [Sustainability](#) Assessment**

The Building Research Establishment Environmental Assessment Method (BREEAM) is a sustainability assessment method that sets standards for the environmental performance of buildings through the design, specification, construction and operation phases and can be applied to new developments or refurbishment schemes. It focuses on sustainable value across range of categories: energy; land use and ecology; water; health and wellbeing; pollution; transport; materials; waste; management.

## **Build to Rent**

Homes built specifically for private renting rather than for sale which meet criteria set out in Policy H11 Build to Rent in the [Publication](#) London Plan, [December 2020](#) [2021](#).

## **Business Eco-System**

A network of organisations, including suppliers, distributors, customers, competitors and government agencies, involved in the delivery of a specific product or service.

## **Business Improvement District**

A defined area in which a levy is charged on all business rate payers in addition to the business rates to develop projects that will benefit businesses in the local area.

## **Cash in lieu / commuted sums**

Payments of money received from developers instead of the provision of affordable residential units [on the development site](#) in the City of London. The money is pooled and used by the City Corporation when opportunities to develop affordable housing arise.

## **CAZ - Central Activities Zone**

The area defined in the London Plan\* where planning policy promotes financial and business services, specialist retailing, tourist and cultural uses and activities. The City is wholly within the CAZ.

## **Changing Places toilets**

These meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide the right equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and carer, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.

## **Circular economy**

An economy which keeps resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.

## **City Flood Risk Area**

Area of the City which is susceptible to flooding from the river Thames, surface water or the sewer network.

## **CIL - Community Infrastructure Levy**

A statutory charge on new development used to contribute towards the funding of infrastructure provision. The City Corporation has prepared a CIL charging schedule that was implemented in July 2014.

## **[Local City Plan](#)**

Document setting out the [statutory local plan, including the](#) strategy, vision and policies and proposals for planning the City.

## **Comparison goods**

Comparison goods are those bought relatively infrequently, so consumers usually compare prices, features and quality before making a purchase. They may include items such as clothes, electrical items, household and leisure goods.

## **CAAC - Conservation Area Advisory Committee**

A consultative group set up to advise on planning applications and other proposals in the City's conservation areas.

## **Construction Logistics Plan**

A travel plan that aims to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the street network.



## **Creative enterprises / Creative industries**

Defined by the Department for [Digital](#), Culture, Media and Sport\* as those industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property. They include architecture; advertising & marketing; crafts, product, graphic & fashion design; film, TV, radio and photography; IT, software & computer services; museums, galleries & libraries; music, performing & visual arts, and publishing.

## **Culturally significant object**

Objects which people identify and value and which reflect their evolving knowledge, culture, beliefs and traditions.

## **[Cultural Culture and Vibrancy Plan](#)**

A [Cultural Culture and Vibrancy Plan](#) is a flexible framework to support the successful incorporation of relevant, enriching and inclusive cultural, [leisure and recreation](#) components within a major development through a step by step process. It is prepared through the development process and the final detail, delivery and ongoing management secured through conditions and/or legal agreement.

## **Decentralised energy**

Energy that is generated close to the place where it is used, so that transmission of electricity, heat and other energy carriers are minimised.

## **Deconstruction**

The act of breaking down a building into components or dismantling - this allows for recycling of the resulting materials. Different to demolition which involves wrecking, destroying or tearing down completely.

## **DSP - Delivery and Servicing Plan**

A plan that shows how a development will proactively manage delivery and servicing arrangements.

## **DCMS - Department for [Digital](#), Culture, Media and Sport**

The government department of state whose responsibilities include recreation, the arts and historic buildings.

[DLUHC – Department for Levelling Up, Housing and Communities](#) ~~MHCLG – Ministry of Housing, Communities and Local Government~~

[The government department of state whose responsibilities include town planning.](#)

## **Design and Access Statement**

A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with.

### **Design Council / ~~CABE~~**

Advisor to central and local government on good design. ~~It includes the Commission for Architecture and the Built Environment (CABE).~~

### **Development Management**

The process by which the City Corporation (and, where appropriate, the Mayor of London and Secretary of State) determine applications for planning permission and related consents. Applications are decided in accordance with the development plan\* unless material considerations (including the NPPF\*) indicate otherwise.

### **Development Plan**

The statutory documents that together set out the planning policies for an area. In the City the development plan comprises the Mayor's London Plan\* together with the City's [Local City Plan](#)\*.

### **DPD - Development Plan Document**

Statutory planning policy document whose preparation process includes public examination. There is one adopted DPD in the City: the Local Plan DPD\*.

### **Embodied carbon**

The total life cycle carbon used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

### **Freight consolidation**

Combining goods shipments into fewer deliveries to reduce the number of freight vehicles required to service a building. This can be achieved through the physical consolidation of goods at an off-site location and/or through methods such as preferred supplier schemes and common procurement strategies.

### **GLA - Greater London Authority**

The GLA comprises the Mayor of London\* (who has an executive role and makes decisions on behalf of the GLA) and a separately elected Assembly (a body of 25 elected Members which has a scrutiny role and is responsible for appointing GLA staff).

### **Green corridors**

Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access routes.

### **Green infrastructure**

A strategically planned, designed and managed network of green spaces and other features vital to the sustainability of any urban area. This includes (although not exclusively) trees, green roofs and walls, green corridors\*, and blue infrastructure such as water spaces and natural drainage features.

### **HRA - Habitats Regulations Assessment**

The purpose of the Habitats Regulations Assessment is to identify any aspects of an emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects are identified.

There is a legal requirement for all Local Plans to be subject to a HRA, set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2017.

### **HIA - Health Impact Assessment**

A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques. The HIA of the [City Local Plan](#) is incorporated into the Integrated Impact Assessment\*.

### **Heritage asset**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets include World Heritage Sites\*, Scheduled Monuments, Listed Buildings\*, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest but have not been formally designated.

### **Historic England**

The body responsible for advising the government, local authorities and others on historic buildings and archaeology. It was previously called English Heritage.

### **Hostile vehicle mitigation**

Structural measures that prevent access to, or close proximity of, unscreened vehicles to a building or space, or measures that reduce the speed of vehicles approaching a site or its defences.

### **Housing trajectory**

A projection of the number of new homes expected to be added to the City's housing stock over a given time period.

### **Inclusive design**

~~Consideration at the design stage to ensure that development makes provision for everyone regardless of disability, age, gender, ethnicity, faith or economic circumstance and addresses the needs of those with mobility difficulties, poor vision and other physical disabilities.~~ **Inclusive design results in an environment which everyone can use, to access and benefit from the full range of opportunities available; confidently, independently, with choice and dignity, which avoids separation or segregation and is made up of places and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.**

### **Incubator office space**

Dedicated office space aimed at start-ups and normally let for a set period of time.

### **Infrastructure**

Term used to describe the facilities and services necessary for people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new public transport facility or school, to the creation of a local play space.

### **Infrastructure Funding Statement**

Proposed statutory statement reporting on the level of developer contributions received through the Community Infrastructure Levy\* and s106 planning obligations and setting out spending priorities for the next 5 years.

### **IIA - Integrated Impact Assessment**

An assessment process which considers the impacts of policies and proposals within statutory plans against environmental, equality, health, and community safety objectives. The City Plan ~~2036~~ **2040** IIA comprises ~~three areas of assessment:~~ a Sustainability Assessment and Strategic Environmental Assessment - required by EU Directive to assess the social, economic and environmental impacts of new policies, **It is supported by:**

- an Equality Analysis - related to the City Corporation's duties under the Equalities Act 2010 ~~and the Crime and Disorder Act 1998, and assessing the impact of new policies on people of different ethnicities;~~
- a Health Impact Assessment\*.

The IIA seeks to assess the impact of the ~~draft~~ City Plan ~~2036~~ **2040** and its alternatives and identify any potential unintended consequences of its implementation.

**Listed building**

A building or structure protected because of its historic or architectural interest. The list of such buildings is drawn up by Historic England\* and the Department for [Digital, Culture, Media and Sport](#)\*.

**LDD - Local Development Document**

Documents containing policies and guidance, comprising Development Plan Documents\*, Supplementary Planning Documents\* and the Statement of Community Involvement\*.

**LDS - Local Development Scheme**

Timetable and project plan for producing the [Local City Plan](#)\*. It is regularly updated.

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## **LIP - Local Implementation Plan**

Statutory transport plan produced by London Boroughs and the City Corporation bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

## **London Plan (Spatial Development Strategy)**

Prepared by the Mayor of London\*, it provides a London-wide planning strategy and the City's Local Plan\* must generally conform to it.

~~SPG – Supplementary~~ [London Planning Guidance](#)

[Guidance prepared by the Mayor of London\\* to explain policies of the London Plan\\*](#).

## **LVMF - London View Management Framework**

Guidance by the Mayor of London\* on the protection of important views, including those of St Paul's Cathedral and the Tower of London.

## **Major development**

[For a full definition see Part 1 of the Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015. Generally, major developments are:](#)

- Residential development of 10 or more dwellings or on a site of 0.5 hectares or more.
- ~~and all other development of~~ [Development of other uses, where the floorspace to be created by the development is](#) 1,000 square metres ~~gross~~ or more ~~floorspace~~, or ~~on a site of~~ [the site areas is](#) 1 hectare or more.

## **Mayor of London**

The Mayor is the executive head of the Greater London Authority\* and is also responsible for a number of related organisations, including Transport for London\*, Homes for London Board and the Metropolitan Police Authority. The Mayor prepares London-wide strategies, including those for planning (the London Plan\*), transport, waste, energy, economic development, housing and air quality. He has powers to direct decisions on large planning applications.

## **Meanwhile use**

A use which is to last for a limited time, or one which is limited in its operation for a particular period of time. Meanwhile is defined as at or during the same time, while something else is being done.

## **Municipal waste**

Waste collected by a local authority, including domestic waste and street cleansing waste. It also includes commercial waste collected by the authority, although waste producers may also have this privately collected.

## **NPPF - National Planning Policy Framework**

The government's statement of planning guidance to local planning authorities, issued by the Department ~~of Communities and Local Government~~ [for Levelling Up, Housing and Communities](#)\*. The latest version was published in [December 2023](#) ~~February 2019~~. The City Corporation must take account of it in preparing and implementing its planning policies.

## **Noise Assessment**

A technical assessment which identifies whether the overall effect of the noise exposure of a building (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation:

Significant observed adverse effect level: the level of noise exposure above which significant adverse effects on health and quality of life occur.

Lowest observed adverse effect level: the level of noise exposure above which adverse effects on health and quality of life can be detected.

## **Offsetting measures**

The measures permitted for dealing with residual emissions remaining after taking account of energy efficiency and decentralised and low carbon energy sources e.g. retrofitting works undertaken by a developer to improve the energy efficiency of existing buildings in the vicinity of the development; export of low carbon heat from the development to other developments; or investment in low carbon community heat infrastructure.

## **Open space**

Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

## **Permitted development rights**

A national grant of planning permission which allows certain building works and change of use to be carried out without having to secure planning permission.



## **Pipe subway**

Tunnels, mainly under streets, that accommodate utilities such as gas and water pipes and electricity and telecommunications cables, providing a more efficient alternative to burying these in the ground.

## **Planning obligations / s106 agreements**

Legal agreements negotiated between the City Corporation and developers (or offered unilaterally by developers) setting out financial and non-financial undertakings to mitigate the direct impact of development. Also known as section 106 Agreements, or s106 planning obligations. From July 2014 some financial planning obligations in the City have been replaced by the Community Infrastructure Levy\*.

## **PPG - Planning Practice Guidance**

An online resource which brings together national guidance on various topics in one place and explains the policies in the National Planning Policy Framework (NPPF)\* in more detail.

## **Policies Map**

A map accompanying the [Local City Plan](#)\* showing where its policies apply to specific locations.

## **PSC - Principal Shopping Centre**

Significant clusters of retail activity within the City of London, which are the local expression of the London Plan's CAZ Retail Clusters. There are 4 PSCs within the City of London: Cheapside, Moorgate/Liverpool Street, Leadenhall Market and Fleet Street.

## **Public Examination**

The [Local City Plan](#)\* will be subject to public examination before an independent planning inspector. The inspector assesses the "soundness" of the [Local City Plan](#).

## **Public realm**

Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

## **Registered Provider**

Not for profit providers of affordable\* and other social housing, including housing associations and regulated by Government.

## **~~Renewal Opportunity Sites~~**

~~Principal opportunities for accommodating large scale development, which may include refurbishment or redevelopment of existing buildings.~~

## **Residential amenity**

The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.

## **Retail Impact Assessment**

An assessment undertaken for an application for retail use on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

## **Safeguarded wharves**

Sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes. ~~A list of these sites that are currently protected and those proposed for protection is available in 'Safeguarded Wharves on the River Thames', GLA, 2005.~~ [On 19 February 2021, the Secretary of State for Levelling Up, Housing and Communities issued Directions for safeguarded wharves in London, requiring all planning applications for safeguarded wharves to be referred to the Mayor of London. There is one safeguarded wharf in the City of London at Walbrook Wharf.](#)

## **Safer City Partnership**

A partnership, comprising representatives from a range of City interests, whose aim is to reduce the level of crime, disorder, antisocial behaviour, terrorism and substance misuse in the City.

## **Secured by Design**

A crime prevention initiative, to encourage those involved in the development industry to adopt crime prevention measures to assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment.

## **Short term residential letting**

Letting of residential property on a non-permanent basis. Under the Deregulation Act 2015, short term residential letting of domestic premises which are liable for council tax for less than 90 days in a calendar year does not require planning permission. Letting for periods of more than 90 days will require permission.

## **SINCs - Sites of Importance for Nature Conservation**

London's most valuable places for wildlife that provide local people with access to nature have been identified as Sites of Importance for Nature Conservation (SINCs). The sites are graded as being of Metropolitan, Borough or Local importance.

## **Smart infrastructure**

Infrastructure which includes sensors that produce, analyse and help to securely share data on the performance of the built and natural environment.

## **Social and community facilities**

Social and community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments, including the Town and Country Planning (Amendment) (England) Regulations 2020. The majority of social and community facilities fall within Class E (Commercial, business and services), Class F.1 (Learning and non-residential institutions) and Class F.2 (Local community uses) use classes. Community facilities include:

- Leisure and cultural facilities (including arts, entertainment and sport facilities)
- Community centres and meeting places (including places of worship)
- Libraries
- Facilities for children (from nursery provision to youth clubs)
- Education (including adult education)
- Healthcare facilities

## **SCI - Statement of Community Involvement**

A plan for public consultation on planning policy documents and planning applications. The City Corporation's SCI was adopted in ~~2016~~ [2022](#).

## **Strategic Cultural Areas**

Areas identified in the London Plan\* with internationally important cultural institutions, which are also major tourist attractions, and include the West End, South Bank/Bankside/London Bridge, Barbican, Wembley, the South Kensington museum complex/Royal Albert Hall, London's Arcadia, Olympic Park and Lee Valley Regional Park.

## **Strategic developments (applications referable to the Mayor)**

The planning applications that must be referred to the Mayor of London\* under the Town and Country Planning (Mayor of London) Order 2008 and any amendments hereto.

## **SEA - Strategic Environmental Assessment**

The environmental assessment of plans, required by EU Directive 2001/42/EC. It is carried out as part of the sustainability appraisal\*.

## **Strategic Flood Risk Assessment**

A document prepared by the Local Planning Authority to provide information on areas that may flood and on all sources of flooding as required by the NPPF\*.

## **SHLAA - Strategic Housing Land Availability Assessment**

A technical assessment to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework\*, paragraph 67).

In London, the Mayor of London\* carries out a London-wide SHLAA to inform the London Plan\* as it determines housing targets for each borough and the City of London. The City of London [Local City](#) Plan relies on the land availability evidence provided by the London-wide SHLAA.

## **SHMA - Strategic Housing Market Assessment**

An assessment of future housing requirements in an area. The assessment informs the development of local and strategic plan strategies and housing targets and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period including addressing the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, ~~people with disabilities~~ [disabled people](#), service families and people wishing to build their own homes).

## **Street hierarchy**

Categorisation of streets in the City of London Transport Strategy\* which describes the function of every street in terms of motor traffic:

- **London Access Streets (TfL network):** Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.
- **City Access Streets:** Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations.
- **Local Access Streets:** Primarily used for the first or final part of a journey, providing access for vehicles to properties.

## **SPD - Supplementary Planning Document**

A document that explains the policies of the [Local City](#) Plan\* in detail. It is subject to consultation, but not public examination\*.

## **SA - Sustainability Appraisal**

The [Local City](#) Plan\* is subject to SA, which ensures that it is soundly based on the principles of sustainable development. SA is carried out as the policies are developed or reviewed so that they can take account of its findings. The SA of the City Plan [2036 2040](#) has been combined with other assessment processes in an Integrated Impact Assessment (IIA)\*.

## **SuDS - Sustainable Drainage Solutions**

A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.

## **Traffic and Environmental Zone**

A security and surveillance cordon that surrounds the City of London. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City.

## **Transport Assessment**

This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.

## **TfL - Transport for London**

~~The body, under the control of the Mayor of London\*, responsible for strategic transport policy and the provision of public transport, including buses and the underground. TfL is responsible for certain major streets in the City.~~ **The body, under the control of the Mayor of London, responsible for strategic transport policy and the provision of public transport, including buses, the Underground and the DLR. TfL is the Traffic and Highways Authority for the Transport for London Road Network (TLRN) or red routes, and controls all traffic signals in London".**

## **Transport Strategy**

A strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.

## **Travel Plan/Cycling Promotion Plan**

A long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.

## **Tower of London World Heritage Site Consultative Committee**

A committee of experts and policy makers providing guidance for the preparation and implementation of the Tower of London Management Plan, and comprising representatives from: Historic Royal Palaces, City Corporation, Historic England\*, GLA\*, International Council on Monuments and Sites (ICOMOS), Department of Culture, Media and Sport\* (DCMS) and the London Boroughs of Southwark and Tower Hamlets.

## **UNESCO - United Nations Educational, Scientific and Cultural Organisation**

Among UNESCO's responsibilities are the inscription of World Heritage Sites, which include the Tower of London.

### **Urban greening**

A process for delivering additional green infrastructure in the City of London. Due to the morphology and density of the built environment in the City, green roofs, green (or living) walls, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.

### **Urban Greening Factor [\(UGF\)](#)**

A model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.

### **Urban heat island**

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, central London can be up to 10°C warmer than the rural areas around London. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

### **Use Classes Order**

A statutory instrument made by the Secretary of State under Section 22 of the Town and Country Planning Act 1990, subsequently amended several times, setting out broad classes of use for land and buildings.

### **Viability Assessment**

An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements that can be provided.

### **Waste management**

The London Plan's\* definition of waste management includes its use for energy recovery or composting or recycle sorting and bulking but does not include waste transfer.

### **Wheelchair accessible**

Homes built to Building Regulation Requirement M4 (3) (2) (b): Wheelchair user dwellings, where the dwelling is constructed to meet the needs of [occupants who use wheelchairs](#) [users](#).

Also includes hotel rooms which are built to be accessible to [guests who use wheelchair](#) [users](#).

### **Wheelchair adaptable**

Homes built to Building Regulation Requirement M4 (3) (2) (a): Wheelchair user dwellings, where the dwelling is constructed to allow simple adaptation to the dwelling to meet the needs of ~~occupants who use~~ wheelchair users.

### **Windfall development/sites**

Housing development that does not take place on sites identified in the Development Plan\* or on the Policies Map\* but is brought forward by developers.

### **World Heritage Site**

A site inscribed by UNESCO\* for its Outstanding Universal Value. The Tower of London, located just outside the City's boundaries, is designated as a World Heritage Site.

### **Zero carbon**

Activity that causes no net release of carbon dioxide or other greenhouse gas emissions into the atmosphere.

### **Zero waste**

Making the most efficient use of resources by minimising the City of London's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.

### ~~**Zero Emission Zone**~~

~~Defined area where access by some polluting vehicles is restricted or deterred with the aim of improving air quality.~~



# **City Plan 2040**

## **City of London Local Plan**

### **Revised Proposed Submission Draft**

**March 2024**

# Foreword

*(To be completed)*

**Shravan Joshi**

Chairman of the Planning & Transportation Committee

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DRAFT

# 1. Strategic Priorities

- 1.1.0 The City Plan 2040 is the Local Plan for the City of London. It is a plan for the development of the Square Mile, setting out what type of development the City Corporation expects to take place and where. The City Plan has been prepared to be in general conformity with the London Plan in a way that reflects the specific circumstances of the City. The City Plan sets out the City Corporation's strategic priorities for planning the Square Mile, together with policies that guide decisions on planning applications.
- 1.1.1 To help realise our vision for the Square Mile, the City Plan 2040 sets out strategic priorities that underpin the policies in the Plan. These priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners.
- 1.1.2 As set out in the National Planning Policy Framework (NPPF), achieving sustainable development means that the planning system has three overarching objectives – an economic, a social and an environmental objective. The strategic priorities have been grouped accordingly, though many priorities will have benefits for more than one of the three sustainable development objectives.

## 1.2 Economic objective

- Delivering sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040
- Ensuring new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces
- Providing flexible and adaptable workspace that meets the needs of different sectors and business sizes, supporting specialist business clusters and promoting a range of complementary uses including education
- Creating a more vibrant and diverse retail economy
- Enhancing the City's evening and weekend economies
- Creating new and enhanced culture, leisure and visitor attractions
- Delivering the accommodation, facilities, attractions and infrastructure required for a leading destination
- Ensuring development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions
- Helping to facilitate the infrastructure requirements of the Square Mile

### **1.3 Social objective**

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone
- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy
- Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas
- Engaging with the City's communities including workers and residents and other stakeholders
- Creating a more inclusive, healthier, and safer City for everyone
- Delivering additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City
- Enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile

### **1.4 Environmental objective**

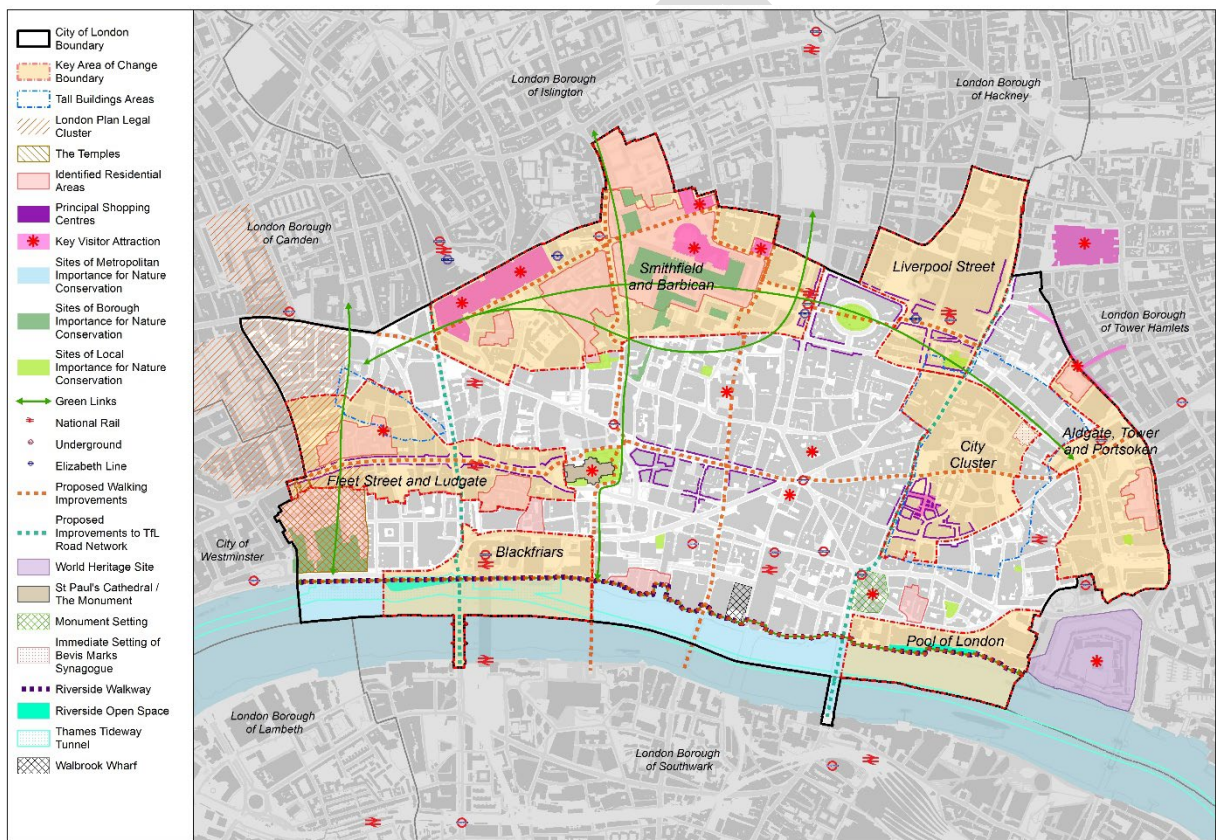
- Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development
- Delivering urban greening and greater biodiversity
- Celebrating, protecting and enhancing the City's unique heritage assets
- Enhancing the City's distinctive and iconic skyline while preserving strategic views of St Paul's Cathedral and the Tower of London World Heritage Site
- Ensuring exemplary design of development
- Promoting greater use of the River Thames for passenger and freight transport, increased enjoyment of the City's riverside and improvements to flood defences
- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.



## 2. Spatial Strategy

- 2.1.0 Many aspects of the City Plan have a spatial element. Different approaches to development and growth need to be taken in different parts of the City to ensure a sustainable pattern of development is delivered, and to bring forward development in a way that enhances the unique character of the Square Mile. This spatial strategy (Figure 1) sets out an overview for how that will be achieved.
1. All parts of the Square Mile will continue to see growth and development over the lifetime of the City Plan. However, some areas – identified in this plan as Key Areas of Change (KAOC) – will see either a greater proportion of net additional floorspace than other parts of the City, or will undergo more significant change to their built form. Priorities for each KAO C are set out in Section 14.
  2. Net additional office floorspace will primarily be delivered in the City Cluster KAO C, supplemented by floorspace in the Fleet Street and Ludgate KAO C and Liverpool Street KAO C. Office growth will be encouraged in all parts of the Square Mile.
  3. Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.
  4. Demand for retail growth is likely to be focussed in the four principal shopping centres (PSC) of Moorgate and Liverpool Street; Leadenhall Market; Cheapside; and Fleet Street. Priorities for each area are set out in Section 6. Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.
  5. Focal areas for culture have been identified in the Cultural Planning Framework (CPF), informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.
  6. New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.
  7. Streets will be planned to facilitate world-class connections and reinforce a Square Mile that is inclusive and accessible to all, as envisaged in the City Corporation’s Transport Strategy.
  8. Green corridors will link up the City’s Sites of Importance for Nature Conservation (SINCs), with development complementing and (where appropriate) contributing to wider environmental enhancements along the routes.

9. The Thames Riverside will play an enhanced role for the City, providing more opportunities for leisure, culture and recreation, with improved greening, biodiversity and connectivity.
10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster and the Fleet Valley, which are identified as areas suitable for tall buildings.
11. The unique character of different parts of the City, including the area's rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments and five historic parks and gardens) will be celebrated, protected and enhanced, and help to shape new development in the Square Mile.



**Figure 1: Key Diagram**

# 3. Health, Inclusion and Safety

## 3.1 Strategic Policy S1: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, employment, education, recreation, sport and leisure opportunities, by:

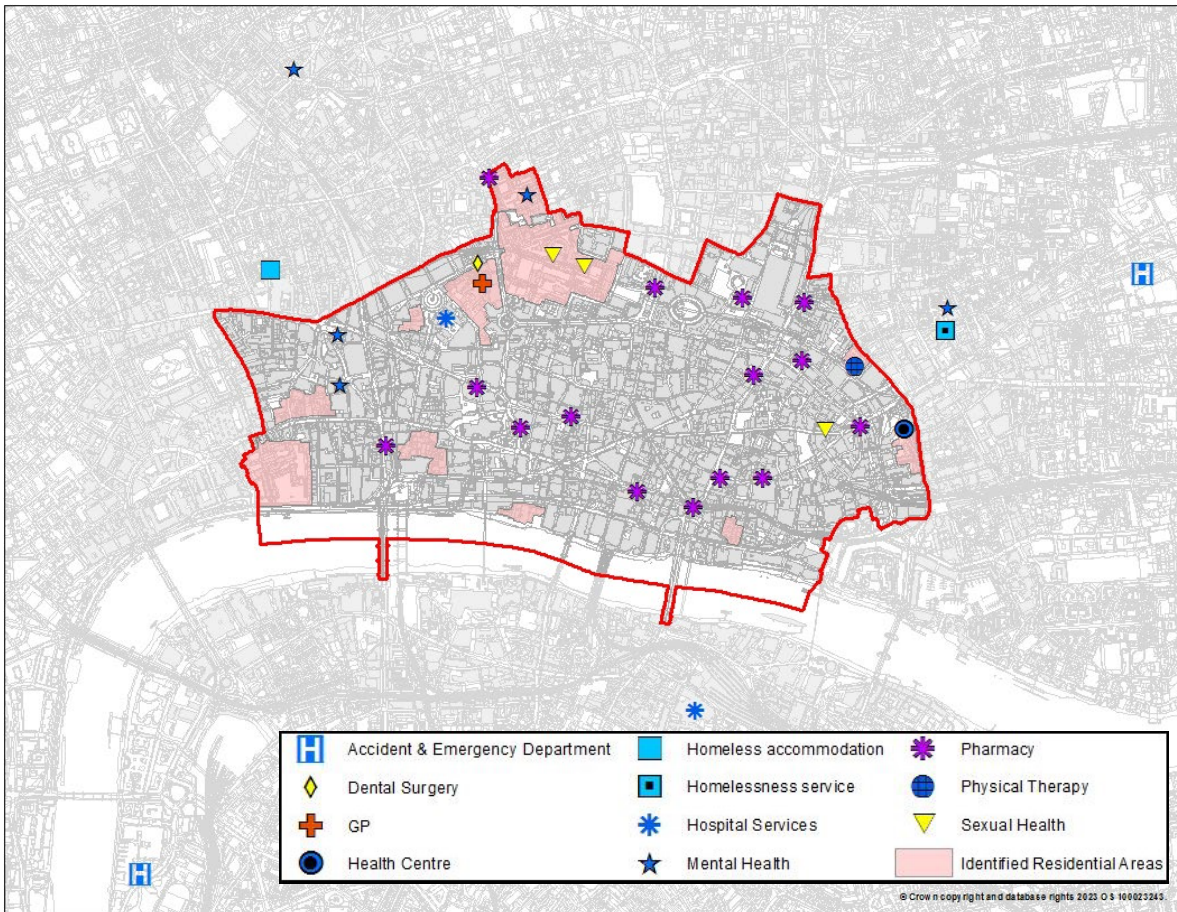
1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings, streets and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments (HIAs) of different levels depending on the scale and impact of the proposed development;
4. Requiring the design and management of buildings, streets and spaces to provide for the access requirements of all the City's communities, including disabled people, older people and people with young children;
5. Requiring inclusive design and management of buildings, streets and public spaces to provide for the requirements of all the City's communities;
6. Expecting developers and development to:
  - engage with neighbours before and during construction to minimise adverse impacts;
  - promote healthy buildings and the use of relevant standards that measure health and wellbeing in buildings;
  - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
  - respect the City's quieter places and spaces;
  - limit unnecessary light spillage and 'sky glow';
  - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment;
7. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing schools and higher education providers within the Square Mile, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;

8. Encouraging the further provision of both public and private health facilities. Conditions may be attached to permissions for public healthcare facilities to ensure their future retention;
  9. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
  10. Supporting facilities for the provision and improvement of social and educational services through the City's libraries;
  11. Supporting nursery provision and additional childcare facilities;
  12. Protecting and enhancing existing community facilities, allowing for relocation where justified, and providing new facilities where required; and
  13. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities, within major developments and public realm improvements, in line with the aims of the City Corporation's Sports Strategy.
- 

### **Reason for the policy**

- 3.1.0 The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:
  - Good mental health for all;
  - A healthy urban environment;
  - Effective health and social care integration;
  - All children have the best start in life; and
  - Promoting healthy behaviours.
- 3.1.1 The Local Plan has a particular role in delivering a healthy urban environment, as it can address issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety.
- 3.1.2 The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.





**Figure 2: Health facilities in and adjoining the City**

- 3.1.3 The small permanent residential population in the City means that it is often not economic to deliver effective services for City residents from locations within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. The City Corporation will work with the City and Hackney Integrated Care Board and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.
- 3.1.4 The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.
- 3.1.5 Advances in technology and an awareness of how office environments can impact people’s mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The

City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

- 3.1.6 Outdoor spaces and the public realm provide places for relaxation, amenity and leisure. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels, and assisting in the restoration and recovery from sensory overload.
- 3.1.7 The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

## **3.2 Policy HL1: Inclusive buildings and spaces**

Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

1. Inclusive, welcoming and safe for all, regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation. Major applications should develop and submit equality impact assessments, demonstrating how this will be achieved;
  2. Convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
  3. Responsive to the requirements of all users who visit, work or live in the City, whilst recognising that one solution might not work for all;
  4. A place that promotes equity, diversity and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access.
-

## **Reason for the policy**

- 3.2.0 An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions or impaired mobility and non-disabled people. The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit and which feels open and welcoming to people from different backgrounds.
- 3.2.1 Under the public sector equality duty, local authorities are required to have regard to the objectives of eliminating discrimination, harassment and victimisation; to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and foster good relations between persons who share a relevant protected characteristic and those who do not.

## **How the policy works**

- 3.2.2 Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and the promotion of equity, diversity and social inclusion. Applicants should engage with relevant user groups, including health and social care providers, at early stages to inform their approach. Such engagement should take place before the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design and Access Statements must include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.
- 3.2.3 Applicants should submit Equality Impact Assessments (EIAs) for major developments to ensure the needs of people belonging to groups with protected characteristics are met, and demonstrating how the development would promote equality, diversity and inclusion.

## **3.3 Policy HL2: Air quality**

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for Air Quality Impact Assessments (AQIAs);
2. Development that would result in a worsening of the City's nitrogen dioxide or PM<sub>10</sub> and PM<sub>2.5</sub> pollution levels will be strongly resisted;
3. All developments must be at least Air Quality Neutral. Developments subject to an EIA should adopt an air quality positive approach. Major developments must



maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>);

4. Developers will be expected to install non-combustion energy technology where available;
  5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation;
  6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
  7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non Road Mobile Machinery;
  8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least 3 metres away from any publicly accessible roof spaces.
- 

### **Reason for the policy**

- 3.3.0 Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area, due to national health-based objectives for the pollutants nitrogen dioxide (NO<sub>2</sub>) and small particles (PM<sub>10</sub>) not being met. National targets for PM<sub>2.5</sub> are also not met.
- 3.3.1 The City Corporation is working with a wide range of organisations to address this problem and levels of NO<sub>2</sub> are falling, although the health-based limits are still not met everywhere in the Square Mile. The City Corporation's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO<sub>2</sub> by the beginning of 2025. Limits set for particulate matter (PM<sub>10</sub>) are generally met although the national target for PM<sub>2.5</sub> is not met

anywhere in the City. The Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM<sub>10</sub> and PM<sub>2.5</sub> by 2030.

- 3.3.2 The City Corporation's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile. While the main source of pollutants in the City has historically been road transport, buildings now account for over half of NO<sub>x</sub> emissions arising in the City. Tackling poor air quality requires a broad range of actions, including reducing traffic congestion and supporting low emission vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting on and around buildings and within the public realm can help to trap particulate pollution.

### **How the policy works**

- 3.3.3 The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and actions being pursued by the City Corporation and a range of partners to improve air quality. The Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile. The City Corporation's Code of Practice for Deconstruction and Construction Sites and the Mayor's Control of Dust and Emissions during Construction and Demolition SPG provide guidance on procedures to be adopted to minimise the impacts of demolition and construction activities on air quality.
- 3.3.4 Developers will be required to manage the impact of their proposals on air quality, which should, as a minimum, be air quality neutral. Large-scale developments that are subject to EIA procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City's air quality.
- 3.3.5 Developers are expected to fully explore the use of non-combustion generators, though it is recognised that there are currently limited options for non-combustion generators. In the short term, alternatives to using diesel as a fuel for generators may be acceptable where non-combustion options are not available. Technological advances during the life of the Plan will create more opportunities to install non-combustion generators.

## **3.4 Policy HL3: Noise**

1. A noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces. New noise-generating development should include suitable mitigation measures such as noise attenuation or restrictions on operating hours.

2. Any potential noise pollution conflict between existing activities and new development should be minimised, in line with the 'agent of change' principle.
  3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near development. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
  4. Opportunities will be sought to incorporate improvements to the acoustic environment within major development.
  5. When bringing forward major development proposals, developers should explore opportunities to enhance the existing acoustic environment.
- 

### **Reason for the policy**

3.4.0 The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise impacts applies to both development that introduces new sources of noise pollution and development that is sensitive to noise.

3.4.1 The main noise and vibration sources related to new developments in the City are:

- Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
- Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- Leisure facilities and licensed premises, involving noise from people and amplified music; and
- Servicing activities such as deliveries, window cleaning and building maintenance.

3.4.2 Noise sensitive uses and developments in the City include residential developments, hotels and serviced apartments, health facilities, schools and childcare provision and certain open spaces.

3.4.3 Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making.

### **How the policy works**

3.4.4 The City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation's Code of Practice for Deconstruction

and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

- 3.4.5 Some major developments may have the potential to enhance the City's acoustic environment, for instance by incorporating water features that can aid relaxation, help to mitigate sensory overload and help to mask traffic noise. More information about this can be found in the City Corporation's Noise Strategy.
- 3.4.6 For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.

### **3.5 Policy HL4: Contaminated land and water quality**

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

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#### **Reason for the policy**

- 3.5.0 When a site is developed, and ground conditions change, there is potential for contaminants to be mobilised, increasing the risk of harm. Site investigation should establish whether the proposed use is compatible with the land condition. The term "non-human receptors" encompasses buildings and other property, or ecological systems and habitats, which may be harmed as a result of contaminated land or water.

#### **How the policy works**

- 3.5.1 Pre-application discussions will be used to identify the particular issues related to environmental protection that are relevant to each development site. The City Corporation has published a Contaminated Land Strategy and a Contaminated Land Inspection Strategy, which provide details of the issues likely to be encountered in different parts of the City and should be used for reference by developers.

### **3.6 Policy HL5: Location and protection of social and community facilities**

1. Existing social and community facilities will be protected in situ unless:
  - Replacement facilities of at least equivalent quality, quantity and accessibility are provided on-site or within the vicinity which meet existing and predicted future needs for this type of facility; or
  - Necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and with equivalent or improved accessibility for relevant user groups; or
  - It has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site.
2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:
  - In locations which are convenient to the communities they serve;
  - In or near identified residential areas, providing their amenity is safeguarded; and
  - As part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

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#### **Reason for the policy**

3.6.0 Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services that are accessible to those communities. As such they make a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education. Library and educational facilities and those that support the City's business and cultural roles are particularly important. A definition of social and community facilities, with reference to the Use Classes Order, is provided in the glossary.

#### **How the policy works**

- 3.6.1 Existing social and community facilities will be protected in situ, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities; or that their loss is part of a published asset management plan, in the case of non-commercial enterprises, or that necessary services can be delivered from alternative premises without a

reduction in service provision. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to another social and community use in the first instance.

- 3.6.2 Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources. Places of worship have the potential to accommodate a range of activities on their premises which can help improve community cohesion. Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.
- 3.6.3 Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable size or provide a better quality of service to target communities.
- 3.6.4 Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.

### **3.7 Policy HL6: Public toilets**

The City Corporation will promote a widespread distribution of publicly accessible toilets which meet public demand by:

1. Requiring the provision of a range of directly accessible public toilet facilities suitable for a range of users including disabled people, families with young children and people of all gender identities in major retail, leisure, and transport developments, particularly near visitor attractions, public open spaces, and existing major transport interchanges. Provision should be made for free 'Changing Places' for disabled people and their carers and facilities for feeding infants;
2. Requiring publicly accessible toilets with visible signage, which should be available 24-hours a day, particularly in areas with concentrations of night-time activity;
3. Supporting an increase in the membership of the Community Toilet Scheme (CTS);

4. Resisting the loss of existing publicly accessible toilets as a result of redevelopment, and requiring the provision of replacement facilities, unless adequate provision is available nearby; and
5. Requiring the renewal of existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments, such as hotels and office schemes, where they are needed to meet increased demand, especially in locations likely to see significant footfall and visitors.

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### **Reason for the policy**

- 3.7.0 Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly accessible toilets are a particularly important facility for certain groups, such as disabled people, older people, families with babies and young children and pregnant women. They are also important to meet the needs of tourists and visitors to the City. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.
- 3.7.1 Areas of the City with concentrations of night-time entertainment require adequate publicly accessible toilet provision to prevent fouling on the streets.

### **How the policy works**

- 3.7.2 The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the City's CTS, and will seek their provision where appropriate in other major developments such as office and hotel schemes. The scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.
- 3.7.3 Publicly accessible toilets should be clearly signposted to ensure they are easily found and should be available 24-hours a day other than in exceptional circumstances. The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.
- 3.7.4 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, rather than as a replacement. Changing places toilets are particularly encouraged in proximity to cultural attractions and should be available for use on a 24-hour basis. Management and maintenance is important to safe use and should be secured through the planning process. Where publicly accessible toilets are provided, consideration should be given to the provision of self-contained gender-neutral toilets.



### **3.8 Policy HL7: Sport and recreation**

1. The City Corporation will promote the expansion of the City's sport and recreation offer, by encouraging sport and recreation provision as part of appropriate new developments and helping to deliver a network of free outdoor sporting facilities in the City.
2. Existing public sport and recreational facilities will be protected in situ, unless:
  - replacement facilities of at least equivalent quality, quantity and accessibility are provided on-site or within the vicinity that meets existing and predicted future needs for this type of facility; or
  - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - it has been demonstrated through active marketing, at reasonable terms for sport and recreational use, that there is no demand for the existing facility or alternative sport and recreation facilities which could be met on the site.
3. The provision of new sport and recreation facilities, particularly publicly accessible facilities, will be encouraged in locations which are convenient to the communities they serve. New facilities should provide flexible space to accommodate a range of different uses and users, must be accessible to all, and should not cause undue disturbance to neighbouring occupiers.
4. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

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#### **Reason for the policy**

3.8.0 There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities, including those within office developments and some hotels. While this is welcome, many facilities charge substantial fees and are not available to those seeking more informal, occasional and cheaper sport and leisure opportunities. By supporting new facilities, and creating a network of facilities across the Square Mile, the City can encourage healthier and more active lifestyles for all. Demand for such facilities is likely to increase due to the rapid growth in the working population and as the City becomes more of a destination for visitors.

#### **How the policy works**

3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities

without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. Where new outdoor facilities are created, priority will be given to those that provide opportunities for recreation that are free or available at low cost. Consideration should be given to locating outdoor exercise facilities for adults and children's play equipment near each other, where appropriate.

### **3.9 Policy HL8: Play areas and facilities**

1. The City Corporation will promote opportunities for inclusive play and the provision of high quality play equipment and spaces in the City, by:

- Protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- Seeking additional or enhanced play equipment and spaces, particularly in areas near to existing or planned attractions, and in places within and well connected to residential areas and other places likely to be used by children and young people;
- Requiring external play space and facilities as part of major new residential developments;
- Where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or provide financial contributions to enable the provision of facilities elsewhere;
- Promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas; and
- Ensuring play facilities are designed inclusively, considering in particular differences in age, gender, neurodiversity and disability. Developers should seek to engage children and young people in the design of play spaces.

2. Play areas and facilities must be inclusive and not be located in areas of poor air quality due to the negative health impacts on young children.

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#### **Reason for the policy**

3.9.0 Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play. As the City increasingly becomes a destination for a wider range of visitors, including families, children and young people, there will be increased demand for play spaces that are free of charge,

well designed, inclusive and accessible. These are likely to be focussed in areas near to leisure destinations such as the new Museum of London in Smithfield and along the Thames Riverside. Play near and within residential areas is also an important component of ensuring communities can be active and healthy and have fun near where they live.

### **How the policy works**

- 3.9.1 The high rate of development in the City and the creation of new, and improvement of existing, public realm creates opportunities for informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.
- 3.9.2 Public realm improvements and the creation of new open spaces should be designed imaginatively to serve the needs of all the City's communities but also offer informal play opportunities. Children and young people are diverse in their experiences of the world and have different ways that they want to play and hang out in social spaces. The design of play space should be informed by these differences and children and young people should be involved in helping to design them. Where the opportunity arises, the City Corporation will enable appropriate sensory play areas in the City for disabled children, young people and adults and those with special educational needs and disabilities.

### **3.10 Policy HL9: Health Impact Assessment (HIA)**

The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts.

Major development should submit a rapid Health Impact Assessment (HIA). A full HIA will be required on those developments that are subject to an Environmental Impact Assessment (EIA). An HIA may also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

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### **Reason for the policy**

- 3.10.0 The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of workers can impact on people's physical and mental health.

- 3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.
- 3.10.2 HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. The Covid-19 pandemic has highlighted the important role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.
- 3.10.3 HIAs can highlight mitigation measures that may be appropriate to enable developments to maximise the health of communities.

### **How the policy works**

- 3.10.4 Developers will be expected to identify potential impacts on health resulting from all major developments in the City, following the approach set out in the City Corporation's Health Impact Assessment guidance note.

### **Rapid HIA**

- 3.10.5 This involves focused investigation of health impacts and would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London Healthy Urban Development Unit's Rapid HIA Tool to reflect the City's circumstances and will expect this to be used for major developments.

### **Full HIA**

- 3.10.6 This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.
- 3.10.7 HIAs must look at the issue of health comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

### **3.11 Strategic Policy S2: Safe and Secure City**

The City Corporation will work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by:

1. Ensuring that development proposals design-out crime and encourage a mix of uses and natural surveillance of streets and spaces;
2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
4. Ensuring that development proposals take account of the need for resilience so that residential and business communities are better prepared for, and better able to recover from, emergencies including fire, flood, weather, and other related hazards as set out in the London Risk Register.
5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building for all building users, including safe and dignified emergency evacuation.
6. Ensuring that development proposals cater to community safety and security requirements particularly those of people more likely to experience crime and fear of safety, including women, girls, children, younger, older and disabled people.

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#### **Reason for the policy**

3.11.0 The City is a safe place to live, work and visit, with low rates of crime. Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation between the City Corporation, neighbouring boroughs, the City of London Police, NPSA and the London Fire Brigade, and between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London taking into account the Mayor's Vision Zero Action Plan to eliminate deaths and injuries on city streets. The City Corporation's Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership publishes a Strategic Plan and its vision is for the City of London to be a safe place to live, learn, work, and visit. Close working with developers and occupiers is also essential.

## How the policy works

- 3.11.1 Security and fire safety features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the development process or following completion. Early engagement with the City Corporation, the City of London Police and the London Fire Brigade is particularly important, including through the pre-application process.
- 3.11.2 The design of a scheme should create safe, inclusive and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience. Where appropriate, developers will be required to contribute towards the funding of measures designed to enhance security.
- 3.11.3 All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which sets out how the development will address fire safety in the design, construction and operation of the building.

## 3.12 Policy SA1: Publicly accessible locations

All major developments are required to address the issue of publicly accessible locations and counter-terrorism by:

1. Conducting a full risk assessment;
2. Undertaking early consultation with the City of London Police on risk mitigation measures; and
3. Restricting or rationalising motor vehicle access where required.

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### Reason for the policy

- 3.12.0 Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.
- 3.12.1 Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development, the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach.

## How the policy works

3.12.2 A risk assessment should be submitted for approval by the City Corporation as part of a planning application for major development or transport proposals. The risk assessment should be proportionate to the nature of the risk identified through consultation with the City of London Police and will typically include:

- Assessment of the risk of structural damage from an attack;
- Identification of measures to minimise any risk;
- Detail on how the perimeter is treated, including glazing;
- Consideration of adjacent land-uses and commuter routes.

3.12.3 The City Corporation will liaise with the City of London Police in considering and approving risk assessments submitted as part of a planning application.

## 3.13 Policy SA2: Dispersal Routes

Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of all people, minimise the potential for over-crowding and reduce the instances of noise nuisance and anti-social behaviour, particularly in residential areas and near noise sensitive uses and developments such as health facilities and schools.

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### Reason for the policy

3.13.0 The City increasingly operates on a seven day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

3.13.1 The City's daytime population places pressure on the City's public realm at peak times. It is therefore necessary to provide details of dispersal routes as part of planning applications for major commercial developments to understand their implications for movement and amenity.

3.13.2 The planning and design of dispersal routes should be inclusive and take into account the needs of disabled people, older people, people with impaired mobility and people with children.



## How the policy works

- 3.13.3 The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy CV5: Evening and Night-time Economy.
- 3.13.4 Major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid overcrowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.
- 3.13.5 A Management Statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help ensure that the measures contained in the Management Statement are appropriate to local circumstances. Assessment of the Management Statement will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

## 3.14 Policy SA3: Designing in Security

1. Security measures must be incorporated into the design of development at an early stage, taking account 'secured by design' principles, to avoid the need for later retrofitting and measures that would adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. Where it is required, Hostile Vehicle Mitigation (HVM) should be integrated into the design of the building. Development proposals should avoid the need for HVM on the public highway and public realm. In exceptional circumstances, where non-integrated HVM is shown to be necessary, consideration should be given to the use of trees, planters and benches to reduce its visual impact. Design and location of any HVM should ensure that public realm and pedestrian permeability is not adversely impacted, and should be designed to ensure an inclusive and accessible public realm.
4. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, or within a wider area where area-based security measures are proposed.

5. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
  6. All security measures which are expected to be more than very short-term should take account of the functionality of the area and needs of its users and should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high quality design.
  7. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.
  8. Security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design.
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### **Reason for the policy**

3.14.0 Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and may be applicable to crowded spaces around a development as well as the building itself. Security measures should be proportionate to the risk and the likely consequences of an attack, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage. Given the limited space within the City, and the density of development, it is important that any required HVM is an integral part of the design of new development, and that it does not disrupt the permeability, accessibility and enjoyment of public spaces for everyone.

### **How the policy works**

- 3.14.1 All new developments must incorporate appropriate security provision to reduce the risk and the likely impact of an attack. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features for individual buildings on the public highway should be a last resort when all other alternative proposals have been exhausted including the scope for an area-based approach.
- 3.14.2 A collective approach to security is likely to be more effective than an individual building approach, particularly in areas of high-density development such as the City Cluster. The City Corporation will use s106 planning obligations requiring developers to contribute to measures to enhance collective security, where appropriate.

- 3.14.3 In considering the impact of new development on the public realm, the City Corporation will take into account the need for additional security measures within the public realm to reduce the risk to individuals from motor vehicles and the potential for vehicles to mount pavements. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, through the use of S106 planning obligations.
- 3.14.4 Developments should aim to achieve a high level of natural surveillance of all surrounding public areas including the highway. Mixed use developments can generate greater activity and surveillance, but a mix of uses within individual buildings may give rise to problems of security, management and amenity. The provision of independent primary and secondary access points will be required so that proposed uses are separate and self-contained. In appropriate circumstances, use of CCTV should be considered.
- 3.14.5 Early engagement with the City of London Police and the City Corporation is essential to ensure that security measures are appropriate to evolving threats. Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.
- 3.14.6 Design and Access Statements should incorporate recommendations from the City of London Police, City Corporation and 'Secured by Design' principles or equivalent, setting out how an inclusive approach to security has been considered at the design stage. Advice in the City Corporation's Public Realm Technical Manual should be incorporated into proposals to ensure developments offer a lasting contribution to the streets and spaces of the City.

# 4. Housing

## 4.1 Housing Context

- 4.1.0 Housing is vital for the City's future economy and its communities. A shortage of housing, particularly affordable housing, is one of the main barriers to future business and community growth in the City and across London. High quality, affordable housing is also essential to meet the housing needs of those of the City's communities on lower incomes.
- 4.1.1 The 2021 Census indicated that the City's permanent residential population was 8,600, which is small in comparison to the working population in excess of 590,000. The GLA's 2021-based interim housing-led projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 9,500 by 2040. The 2021 Census indicated that there were 1,700 second homes in the City of London.
- 4.1.2 The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential areas are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2023.
- 4.1.3 The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London. The City Corporation provides over 1,800 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City.
- 4.1.4 Clustering new housing development in or near existing residential areas allows greater opportunity to protect residential amenity and deliver a high quality residential environment. Residential clustering reduces potential conflict with commercial and office uses. There may be occasional opportunities for new residential development on appropriate sites near identified residential areas, such as through the re-use of heritage assets, where the potential to meet future office needs may be limited by site-specific considerations.
- 4.1.5 References to housing in this Plan include market and affordable housing (comprising social rented housing, affordable rented housing and intermediate housing), hostels, sheltered and extra-care housing. It also includes Built to Rent and Co-Living accommodation which are likely to have an increasing role in meeting future housing needs, particularly for City workers at an early stage of their careers. References to housing in this Plan do not include student

accommodation, as it may be appropriate in different locations to other forms of housing.

- 4.1.6 Co-Living accommodation will contribute towards meeting general housing need at the national ratio for non-self-contained accommodation of 1.8 bedrooms to 1 residential unit. Student accommodation contributes to meeting general housing need at the national ratio of 2.5 student rooms to 1 residential unit.

### **Housing requirement**

- 4.1.7 The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs.
- 4.1.8 The London Plan's strategic framework includes Policy SD5 which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context, the London Plan is informed by a Strategic Housing Land Availability Assessment (SHLAA) for London, providing guidance on the amount of land potentially available in the City for residential development. The 2017 SHLAA identified a potential supply of large housing sites in the City in the period 2019-2029 of 527 dwellings and an annual average of 74 dwellings on sites under 0.25 hectares, based on past trends. In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan's target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets.
- 4.1.9 Different assessment methods provide different figures for local housing need. Using the national standard method for assessing local housing need at the time of preparing this Plan, the City's minimum annual local housing need figure would be 102.
- 4.1.10 The City Corporation recognises that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the national standard method. This Local Plan therefore seeks to meet the City of London's London Plan housing target between 2025/26 and 2029/30 (an average 146 dwellings per annum) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40 (an average of 102 dwellings per annum). This gives a total housing requirement of 1,706 dwellings, and can be expressed over three periods of five years:
- 2025/26 to 2029/30: 686 dwellings

- 2030/31 to 2034/35: 510 dwellings
- 2035/36 to 2039/40: 510 dwellings

- 4.1.11 Housing delivery in the City is impacted by the volatile nature of the wider London housing market. If past volatile trends continue, new housing delivery in the City is likely to fluctuate from year to year and monitoring and delivery performance should therefore be assessed against overall delivery both in the period up to 2028/29 for the London Plan and up to 2040 for the City's wider housing target, rather than on an annual basis. The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.
- 4.1.12 The City Corporation's Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through 'windfall' development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.
- 4.1.13 The City Corporation has committed to play a leading role in tackling the housing shortage in London with a pledge to build hundreds of new social homes and thousands of additional mixed tenure homes. The City Corporation aims to deliver at least 700 new social homes on City-owned land and housing estates with potential for renewal and expansion. Where these homes are outside of the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a significant number of additional mixed tenure homes on other sites in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs. The co-location of the City Corporation owned and managed wholesale markets (Smithfield Meat Market, Billingsgate Fish Market and New Spitalfields Fruit and Vegetable Market) onto one site in Dagenham would provide an opportunity for mixed use redevelopment which could include housing.

### **Affordable Housing**

- 4.1.14 The City of London can be an expensive area to live in. ONS data shows that the affordability ratio of lower quartile house prices to lower quartile residential earnings in 2021/22 was 14.25, above the London average of 13.46 and the England average of 7.28. The City of London SHMA shows that market rental prices in the City were significantly above the London-wide average or the

average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests affordable dwellings should be maximised to meet affordable housing needs.

### **Gypsy and traveller accommodation**

The London Plan indicates that, in the absence of an up-to-date local gypsy and traveller needs assessment, boroughs should use the need figure set out in Table 4.4 of the London Plan. This table indicates that there is no need for specific gypsy and traveller accommodation in the City of London. The City Corporation will work with the Mayor and London Boroughs in the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment.

## **4.2 Strategic Policy S3: Housing**

The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City's needs by:

1. Making provision for a minimum of 1,706 net additional dwellings between 2025/26 and 2039/40:
  - Encouraging new housing development on appropriate sites in or near identified residential areas;
  - Within identified residential areas, prioritising the delivery of affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in some instances to have a role to play in making housing development viable;
  - Protecting existing housing where it is of a suitable quality and in a suitable location;
  - Exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and
  - Refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2.
2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by:
  - ensuring the delivery of a minimum of 50% affordable housing on public sector land;
  - requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and
  - providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing



and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.

3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
  4. Ensuring that other new land uses within identified residential areas are compatible with residential amenity.
  5. Requiring at least 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 

### **Reason for the policy**

- 4.2.0 London has a severe housing shortage caused by a growing population and an inadequate supply of housing units. 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. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still ensuring that the City remains predominantly a commercial office centre of national importance.
- 4.2.1 New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Suitably located housing in the City can address local housing need (in 2023 there were 977 people on the City Corporation's housing waiting list) and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.
- 4.2.2 The London Plan detailed Policy H11 supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting, is typically owned by institutional investors, offers the potential for longer term returns for investors and importantly, longer lease terms and security for tenants. The City Corporation will support Build to Rent in or near the City's residential areas and where it meets the detailed requirements in the London Plan.
- 4.2.3 The City Corporation considers that there is potential within or near the identified residential areas for co-living accommodation and will encourage such provision on appropriate sites. Co-living accommodation will typically provide private ensuite bedrooms, shared social and kitchen spaces and co-working spaces. They are often suitable for people at early stages of their career.
- 4.2.4 Where appropriate, the City Corporation will support the appropriate regeneration of residential estates in the City where it will deliver improved living

conditions for existing tenants and provide additional housing to meet housing needs.

- 4.2.5 Many households in London already require accessible or adapted housing to lead dignified and independent lives. More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving to alternative accommodation.

### **How the policy works**

- 4.2.6 To ensure that permissions for new housing are built out in a timely fashion, developers should provide information on the expected completion date for new residential development. The City Corporation will keep this under review and expect developers to liaise with the Corporation where it becomes apparent that anticipated completion dates cannot be achieved.
- 4.2.7 There is a presumption in national policy and the London Plan that new affordable housing associated with housing development should be provided on-site. The City Corporation will expect developers to deliver on-site affordable housing in new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable and that off-site provision would better deliver mixed and inclusive communities than on-site provision.
- 4.2.8 The City Corporation requires commercial development to make a financial contribution towards off-site affordable housing delivery instead of delivering mixed use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.
- 4.2.9 Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace to strengthen its strategically important business role. The City Corporation therefore also works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation-owned housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. Although some affordable housing provision outside the City will continue to be funded by contributions from commercial development in the City, the presumption in this Plan is that new housing development in the City should provide affordable housing on-site.
- 4.2.10 The London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m<sup>2</sup>. The Mayor has adopted a

threshold approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, or 50% on public sector land, are not required to submit viability information. Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses.

- 4.2.11 In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. On public sector owned land, the higher 50% target will be applied as set out in the London Plan. The presumption is that affordable housing provision should be made on-site and all sites will be expected to deliver at least the minimum required level of affordable housing. Off-site provision or cash in lieu contributions will only be accepted in exceptional cases. In these cases where off-site provision or cash in lieu contributions are considered to be acceptable in principle, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include review mechanisms in line with the Viability Tested Route, as set out in the London Plan. This means that the off-site provision, or the financial contribution, will be set at a level which captures the full uplift in value when delivering 100% market housing. This will ensure that the development is not more viable when the affordable housing obligation is satisfied through off-site provision or a cash in lieu payment in comparison to on-site delivery. The level of off-site provision, or the amount of the cash in lieu payment, must be sufficient to deliver at least the same number, size and type of affordable homes that would be required on-site. Further guidance on affordable housing requirements, including the methodology for calculating the level of cash in lieu or off-site contributions required is set out in the City Corporation's Planning Obligations SPD. This guidance will be kept under review and amended as required to ensure financial contributions keep pace with the cost of delivering affordable housing and will continue to be sufficient to meet the full affordable housing requirements set out in this Plan.
- 4.2.12 Developments that propose lower levels of affordable housing, or where a developer considers particular circumstances exist that make a policy compliant scheme unviable, will need to be supported by robust viability assessments. These assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will commission an independent review of submitted assessments, with the cost being met by the applicant. Consideration of viability and overall levels of affordable housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.
- 4.2.13 The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. Overpaying for a site is not an appropriate justification for failing to meet the affordable housing target.
- 4.2.14 Where a viability assessment for a development demonstrates that the Plan's affordable housing targets cannot be met, the level of contribution should be

determined based on the maximum amount of affordable housing at the relevant tenure split that could be provided on-site, as assessed through viability assessments. The detailed wording and timing of these review mechanisms will be determined on a case-by-case basis, having regard to the City Corporation's SPD and London Plan Guidance prepared by the Mayor of London.

- 4.2.15 Various types of affordable housing are included within the national definition of affordable housing. The London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a sit- by-site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes.
- 4.2.16 The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible.

### **4.3 Policy HS1: Location of New Housing**

1. New housing will be encouraged on suitable sites in or near identified residential areas. Within these areas a mix of residential, commercial, community, cultural and other uses will be permitted.
2. New housing must not:
  - Prejudice the primary business function of the City. Where proposed development would result in the loss of office floorspace it must meet the requirements of Policy OF2;
  - Inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
  - Result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.
3. Where existing residential estates are being redeveloped, an increased number of residential units will be expected, and the existing affordable housing on-site must be re-provided with at least the equivalent floorspace and tenure of affordable

housing. Affordable housing which is re-provided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.

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### **Reason for the policy**

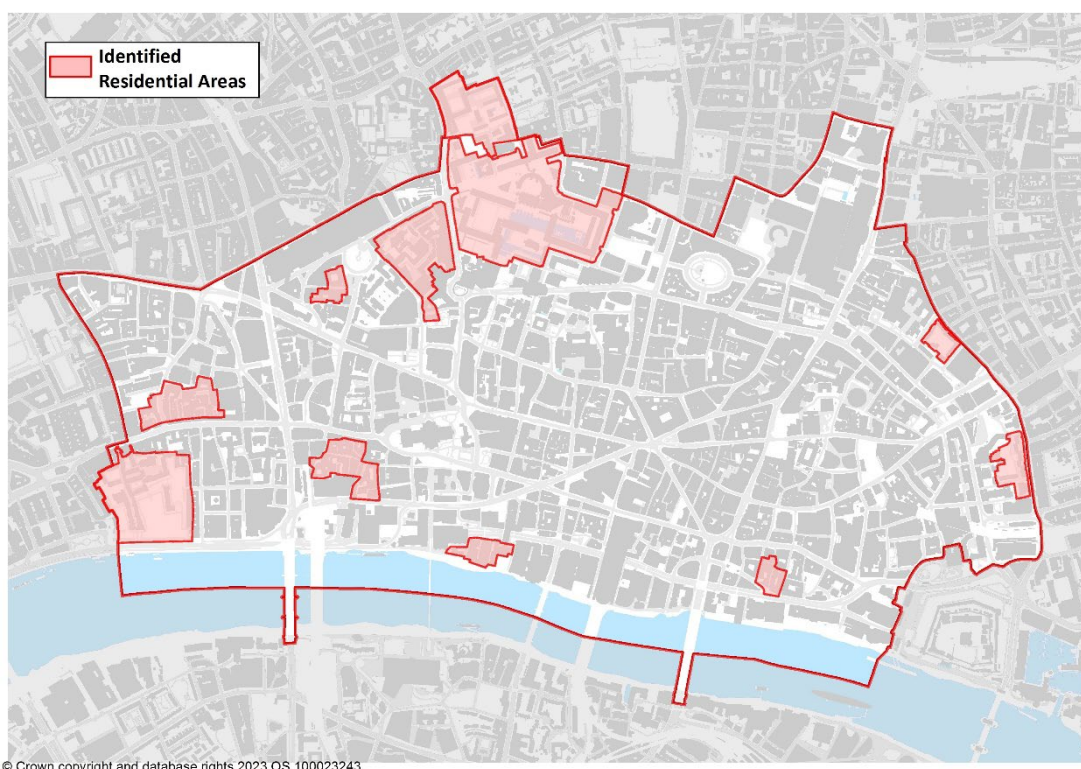
- 4.3.0 The City is a busy and sometimes noisy place, with a high density of development and business activity at all times during the day and evening, seven days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because it could have an adverse impact on the City's primary business role and would be likely to have poor residential amenity. The London Plan indicates that residential development is inappropriate in identified parts of the City to ensure that the current and future potential to assemble sites and deliver office development is not compromised by residential development. Elsewhere in the City, the London Plan indicates that offices and other strategic functions of the Central Activities Zone (CAZ) should be given greater weight in planning terms than residential development, except in wholly residential streets or predominantly residential neighbourhoods.
- 4.3.1 The City's policy approach is therefore to encourage new housing to be located within or near the identified residential areas shown in Figure 3, where reasonable residential amenity consistent with a central London location can be achieved. This approach helps to minimise disturbance to residents within the areas, while reducing potential conflict with the development and operation of commercial uses and providing a suitable framework for delivery of additional housing in the City.
- 4.3.2 Due to the size and unique character of the City, all new housing has previously come forward on 'windfall' brownfield sites through the redevelopment or conversion of existing buildings as opportunities arise, within a similar policy framework to the one in this City Plan. This pattern of housing delivery is projected to continue throughout the life of this new Plan, delivering sufficient new housing over the Plan period to meet London Plan targets and projected local housing need. There is no need to allocate sites in the Local Plan to meet housing targets.

### **How the policy works**

- 4.3.3 The policy sets out those parts of the City that are suitable for housing, specifically in and around established identified housing areas. In reality, the majority of proposals for new housing in and around these areas would be likely to be on sites occupied by office uses. It is therefore important to read this policy in conjunction with Policy OF2.
- 4.3.4 Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted

which demonstrates how the development will mitigate the impact of that noise and pollution.

- 4.3.5 Regeneration of housing estates will often involve the redevelopment of existing homes. Regeneration schemes should deliver an increased number of dwellings, where this is compatible with the delivery of a high quality living environment for existing tenants. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. Tenants should be involved at all stages of the process and have the opportunity to shape the proposals. Regeneration schemes should seek opportunities to improve social infrastructure and open spaces within the estate. This will help protect established local communities.



**Figure 3: Residential areas**

## **4.4 Policy HS2: Loss of housing**

The net loss of existing housing units, including the amalgamation of residential units, will not be permitted except where:

1. They provide poor amenity to residents which cannot be improved; or
2. They do not have a separate entrance; or
3. Exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

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## Reason for the policy

- 4.4.0 The net loss of existing housing units will be resisted because of the limited opportunities to replace it in the City. This policy will also be applied to proposals for the amalgamation of adjoining residential units unless the existing accommodation is of such poor quality that it cannot provide a reasonable standard of amenity, or the proposed amalgamation of no more than two units would meet a clearly identified need for larger family accommodation or for retirement purposes. Exceptionally the net loss of existing housing may be acceptable outside residential areas where the development of offices will have a significant beneficial impact for the City. Isolated residential units outside identified residential areas can suffer poor amenity, such as noise nuisance and other disturbance due to non-residential uses in close proximity, including clubs and pubs, and can be adversely affected by the operation of the business City.
- 4.4.1 Development sites that have received planning permission for residential units, and which demonstrate that there is a deliverable housing element, will be refused permission for change of use to non-residential use.

## 4.5 Policy HS3: Residential environment

The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements.

1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity;
2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9;
3. The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.

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## Reason for the policy

- 4.5.0 The City is predominately a centre of business, with activity taking place at all times during the day and evenings, 7 days a week. This sometimes results in noise and disturbance to residents from new commercial development and



commercial activities nearby. While the City Corporation will endeavour to minimise noise and other disturbance to residents it is inevitable that living in such a densely built-up area will result in some disturbance from a variety of sources, particularly outside the identified residential areas.

- 4.5.1 The need to minimise overlooking and overshadowing of residential accommodation and minimise light spill where it impacts on residential accommodation, is a consideration in the design and layout of both new residential buildings and other development. However due to the density of development in the City it may not always be possible to entirely avoid any impacts on amenity.

#### **How the policy works**

- 4.5.2 The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas.

### **4.6 Policy HS4: Housing quality standards**

All new housing must be of a high quality design and of a standard that facilitates the health and wellbeing of occupants and neighbouring occupants, and:

1. Meets London Plan housing space standards, including outdoor space standards and amenity space for individual units;
2. Meets standards for Secured by Design or similar certification;
3. Maximises opportunities for providing communal open and leisure space for residents;

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#### **Reason for the policy**

- 4.6.0 All new housing, including changes of use to housing from other uses, will be expected to provide well designed, high quality living environments, both internally and externally, incorporating principles of inclusive, secure and sustainable design.

#### **How the policy works**

- 4.6.1 Housing development should comply with the requirements in the London Plan. The layout should incorporate sufficient space and facilities for waste, recycling bins and disabled and cycle parking.

- 4.6.2 Private outdoor space should be provided in line with London Plan standards. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy HL8. There should be no distinction between amenity spaces and play areas for private and affordable housing residents. Proposals which seek to restrict access to such areas by affordable housing tenants will be refused.

## **4.7 Policy HS5: Short term residential letting**

1. Short-term letting of permanent residential premises for over 90 days in a calendar year will not normally be permitted as it would reduce the stock of permanent housing in the City and may adversely impact the amenity of existing residents.
2. Short term letting to provide residential accommodation for commercial purposes will not be permitted unless the units are contained within a separate building and will not be permitted if mixed with permanent residential accommodation.
3. Where short term residential letting is permitted for commercial purposes, conditions will be imposed to prevent any later changes to permanent residential use in unsuitable accommodation or locations.

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### **Reason for the policy**

- 4.7.0 The City of London is primarily a commercial office centre. There is a small stock of permanent residential properties, and this stock needs to be maintained and increased to ensure that the City can continue to meet its assessed housing need. Loss of residential accommodation to short-term letting would reduce the overall stock of permanent housing and the City's ability to meet its housing need. At the same time, there is some demand for residential accommodation that can be let on a short-term basis to provide for the needs of the City's business community, particularly for visiting workers. Such short-term accommodation has a role to play but should not be mixed with permanent residential accommodation as it can impact the amenity of neighbours.

### **How the policy works**

- 4.7.1 Under the Deregulation Act 2015, short-term letting for less than 90 days in a calendar year of domestic premises liable for council tax does not require planning permission. Letting for periods of more than 90 days in a calendar year would require permission.
- 4.7.2 Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and adversely impacting on the amenity of existing residents.

- 4.7.3 Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy HS1.
- 4.7.4 Where short term lets are proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.
- 4.7.5 The requirement for the provision of affordable housing in Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

## **4.8 Policy HS6: Student accommodation and hostels**

1. Proposals for new Purpose-Built Student Accommodation (PBSA) and hostels should support the City of London's primary business function and the vibrancy of the Square Mile. They will only be permitted where:
  - They would meet high standards of design and amenity for occupants;
  - There are appropriate amenities for occupants in the local area;
  - They are well connected to relevant further or higher education institutions;
  - They would not prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2;
  - They would not have an adverse impact on the residential amenity of the area; and
  - They would not involve the loss of permanent residential accommodation.
2. Proposals for PBSA should be supported by identified further or higher educational institutions operating in the City of London or the CAZ.
3. 35% of student accommodation on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
4. The loss of existing student accommodation and hostels to other suitable uses which are in accordance with Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is evidence that student accommodation is impacting on residential or business amenity.

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### **Reason for the policy**

- 4.8.0 The demand for student accommodation in London continues to grow. Higher education provision is a key part of London's attractiveness as a World City and supports the City of London's commercial role. However, opportunities for

residential development in the City are limited and student accommodation may represent an opportunity lost to meet other housing needs in residential areas.

### **How the policy works**

- 4.8.1 PBSA should be supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the CAZ through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation.
- 4.8.2 The Housing Delivery Test establishes a national ratio that every 2.5 student bedrooms in PBSA meet the same housing need as one conventional housing unit and contribute to meeting the City's housing target at this ratio.
- 4.8.3 Student accommodation, like all development in the Square Mile, should meet the highest standards of accessibility and inclusive design. To help achieve this, the appropriate proportions of accessible rooms should be provided, in line with guidance issued by the Greater London Authority, which advises that the relevant part of London Plan Policy E10 Part H applies to development proposals for new non-self-contained student accommodation.
- 4.8.4 Student accommodation should be built to a high standard, including appropriate sunlight and daylight levels.
- 4.8.5 New student accommodation must not impact adversely on the amenity of existing residents or occupiers, either individually or cumulatively with other student accommodation developments. Developers will be expected to proactively liaise with local residents and businesses to manage the impacts of the development and offer mitigation solutions. Applicants will be required to submit Management Statements detailing how amenity issues will be addressed.
- 4.8.6 Hostels can contribute to providing accommodation for homeless people. The City Corporation's Homelessness Strategy outlines how the Corporation will seek to reduce the incidence of rough sleeping in the City through collaborative working with outreach services, health services, the City of London Police, businesses and others. The Strategy seeks to provide appropriate accommodation options for homeless people, including through the use of s106 contributions to deliver new affordable housing or hostels. Hostels may be acceptable within or near identified residential areas, where the amenity of existing occupiers is protected.

### **4.9 Policy HS7: Older persons housing**

The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:

1. Seeking to provide a minimum of 86 net additional dwellings for older persons between 2023 and 2040 supporting development that meets the specific needs of older people;
  2. Supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
  3. Ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and
  4. Resisting development that involves the net loss of housing for older people.
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### **Reason for the policy**

4.9.0 The City of London has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for 86 specialist older person units over the life of the Plan, however this figure does not take into account older people who choose to stay in their own homes and access personalised care. The London Plan has an indicative figure of 10 units per year.

### **How the policy works**

4.9.1 The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet identified needs. Housing suitable for older persons, including sheltered housing, is provided by the City Corporation on its land and estates, inside and outside of the City. Provision outside the City may assist in meeting the need for older persons housing for City residents through nomination rights. Specialist older persons housing should deliver affordable housing in line with Policy S3.

## **4.10 Policy HS8: Self and custom housebuilding**

The City Corporation will encourage the provision of self and custom build units within large residential schemes.

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### **Reason for the policy**

4.10.0 The Self Build and Custom Housing Building Act 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The City Corporation launched its own register for prospective self-build and custom housebuilding in 2016.

## How the policy works

4.10.1 There are no large areas of unused land in the City of London that would provide an opportunity to create serviced building plots. Furthermore, self-build and custom-build are likely to involve lower density development, which would conflict with policies in the Plan which seek to maximise housing supply. Given these constraints, the City Corporation considers that the best prospect for bringing forward suitable land will be in conjunction with large housing developments.

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# 5. Offices

## 5.1 Strategic Policy S4: Offices

The City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by:

1. Increasing the City's office floorspace stock by a minimum of 1,200,000 m<sup>2</sup> net during the period 2021 to 2040, phased as follows:
    - 2021 – 2026 500,000m<sup>2</sup>
    - 2026 – 2031 400,000m<sup>2</sup>
    - 2031 – 2036 200,000m<sup>2</sup>
    - 2036 – 2040 100,000m<sup>2</sup>
  2. Ensuring that new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of Small and Medium Enterprises (SMEs), start-up companies, creative industries and those requiring move-on accommodation.
  3. Promoting the retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation.
  4. Where appropriate, encouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City.
  5. Protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City. Where necessary, conditions may be attached to permissions for new office floorspace to secure its long-term use for such purposes.
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### Reason for the policy

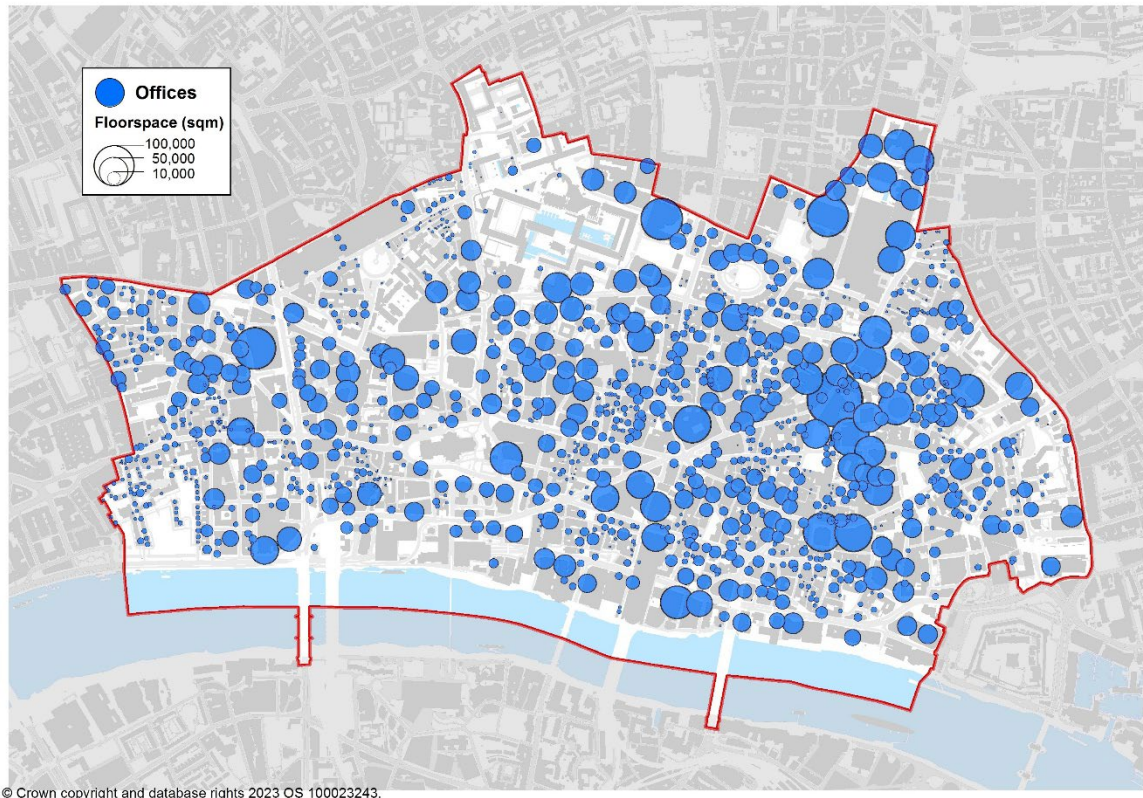
- 5.1.0 The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business as well as providing agglomeration benefits. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth.
- 5.1.1 To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 1,200,000m<sup>2</sup> is derived from



the estimated growth in office employment between 2021 and 2040 and represents a 13% increase in floorspace. Capacity modelling demonstrates that there are sufficient sites to meet this demand, provided primarily within the City Cluster area, supplemented by additional capacity elsewhere in the City.

- 5.1.2 The demand target is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central target is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
- 5.1.3 Recent years have also seen strong demand for 'best in class' or Grade A+ floorspace. Many businesses are placing greater value on high quality sustainable and well-being credentials, quiet spaces for phone calls or working, abundance of meeting spaces and places for collaboration, good access to public transport and food and beverage amenities as well as design that communicates the company's brand and values.
- 5.1.4 Office floorspace need will be met through the delivery of new office space and through the refurbishment and retrofit of existing space to comply with current office floorspace standards and meet the Government-set requirements for minimum energy efficiency standards.
- 5.1.5 Traditional office based jobs are the dominant sector in the Square Mile, representing 59% (346,000) of all jobs in 2021, but emerging office-based firms are faster-growing, consisting of 41,600 new jobs (+62% between 2015 and 2021). There were 22,300 businesses and 590,000 workers in the City in 2021 and employment is projected to continue to grow over the long term. The City accommodates 440,000 office based jobs in an estimated 5.3 million m<sup>2</sup> (Net Internal Area) of office space. Over 99% of all the City businesses are SMEs with fewer than 250 employees; 80% have fewer than 10 employees.
- 5.1.6 In 2023, 29% of take-up of office floorspace in the City of London was from media and tech firms, compared to 19% from financial companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. This broader range of occupiers is creating requirements for a broader range of office types.
- 5.1.7 Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.
- 5.1.8 As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. Developers and building

owners are also encouraged to consider a range of leasing structures, including below market rents to ensure that a range of affordable workspaces are available to meet demand, in particular from new and emerging sectors of the economy and creative industries.



**Figure 4: Office distribution**

### How the policy works

- 5.1.9 Strategic Policy S4 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.
- 5.1.10 The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first two phasing periods.
- 5.1.11 The City Corporation has made an Article 4 Direction removing permitted development rights for the change of use of offices (E(g)(i)) to dwelling houses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan.
- 5.1.12 Changes to the Use Classes Order introduced in September 2020 mean that offices can be converted to a range of other Class E commercial, business and

service uses without planning permission. Where permission is granted for office schemes that meet a specific identified need, conditions may be attached to ensure the impacts of any proposed later conversion of such space can be considered through the planning application process.

## 5.2 Policy OF1: Office Development

1. Office development should:

- Prioritise the retrofitting of existing buildings;
- Be of an outstanding design and an exemplar of sustainability;
- Be designed for future flexibility to future proof the City's office stock and realise the principles of circular economy design approaches;
- Provide office floorspace suitable for a range of occupiers;
- Provide healthy and inclusive working environments that promote wellbeing; and
- Where appropriate, provide a proportion of flexible and affordable workspace suitable for micro, SMEs.

2. Other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for businesses, workers and residents.

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### Reason for the policy

5.2.0 A range of office floorspace is required to accommodate the future needs of the City's office occupiers and this should include provision for incubator, co-working and accelerator space, as well as provision for larger firms where required. Flexible and affordable office floorspace is required that can be easily adapted to meet changing workplace and technology requirements and the needs of a variety of office occupiers.

5.2.1 Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City's economy include retail, leisure, education, health facilities and cultural uses. A mix of commercial land uses, in particular at ground floor and basement levels, will be required to create active frontages enhancing an area's vitality and provide important complementary services. They also provide opportunities for creativity, collaboration and social interaction, which are key to the success of the City's business clusters. Some uses have the potential to undermine the functioning, servicing and use of

offices, particularly in areas of high density employment and where offices are required to be serviced overnight.

### **How the policy works**

- 5.2.2 Proposals for new office development should demonstrate design quality and flexibility to accommodate a range of businesses. Particular encouragement will be given to floorspace which meets the needs of small businesses, start-ups and incubator space. Office development should include a suitable mix of complementary commercial or other uses appropriate to the site and location and contribute to the creation of active frontages at street level. Where appropriate, conditions or legal obligations may be used to ensure the delivery of a range of affordable workspaces.
- 5.2.3 Many office lobbies have been designed to project a corporate image, and function as through space to access lifts. This can lead to a blank frontage on the street, especially with large windows on the facade with minimal internal activity and no public access. A lobby has the potential to be a more interesting and engaging space. Lobbies can be multifunctional spaces for interaction and provide spaces that contribute positively to the life of the City. The addition of publicly accessible facilities (including public toilets), co working spaces, breakout spaces, art gallery or cafes can create a more active lobby. Office buildings should include dynamic ground level uses to enhance their lobbies. Entrances should be easy to identify and should allow everyone to use them independently without additional effort, separation or special treatment. Revolving entrance doors are not accessible to a range of people.

### **5.3 Policy OF2: Protection of Existing Office Floorspace**

1. The loss of existing office floorspace will be resisted unless it can be demonstrated that:
  - The proposed development would not lead to the loss of office floorspace that is, or sites that are, of a strategically important scale, type and/or location for the City;
  - The proposed development would not compromise the potential for office development on sites within the vicinity; and
  - There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months.
2. Where the criteria in part 1 of this policy have been met, proposals that would lead to the loss of existing office floorspace may follow one of the following routes:
  - a. Viability tested route: Proposed development will be required to demonstrate that the retention, refurbishment or re-provision of the office floorspace would not be viable in the longer term, demonstrated by a viability assessment;

- b. Retrofit fast track: Proposed development will be required to retain the substantial majority of the superstructure of the existing building, lead to an improvement in the environmental performance of the building, and result in change of use to (one or a mix of) hotel use, cultural uses, and/or educational use. Partial retention of office floorspace will be encouraged;
  - c. Residential areas route: the loss of office floorspace is proposed on a site within or immediately adjacent to identified residential areas and would result in the provision of additional housing;
  - d. Ground floor uses: the loss of office floorspace would be limited to ground or below ground levels, and proposed new uses would be complementary to continued office use on upper floors. Active frontage uses will be required at ground floor levels in most instances.
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### **Reason for the policy**

- 5.3.0 The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the projected increase in employment and office floorspace, it is important to retain the substantial majority of existing office stock whilst accommodating future demand through the provision of flexible floorspace that is suitable for a range of occupiers and refurbished office space.
- 5.3.1 The protection and refurbishment of existing office space is important to ensure that there is sufficient floorspace to meet future demand, and to offer a range of office stock to provide choice in terms of location and cost to potential occupiers. This includes 'best in class', grade A and grade B floorspace. While the current market for grade B space in the City is facing headwinds, with some traditional grade B occupiers shifting to more flexible working patterns or seeking other forms of flexible workspace, it remains uncertain whether this will persist over the longer term. This will be monitored and guidance will be issued if required to provide additional advice on appropriate responses to this potential challenge.
- 5.3.2 Following changes to the Use Classes Order introduced in September 2020, existing offices can be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.
- 5.3.3 Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy DE1 and the need to find suitable and sustainable uses for historic buildings.
- 5.3.4 The City of London Local Plan has for many years sought to protect suitably located and viable office floorspace, with marketing and viability evidence required to support proposals that result in a loss of office floorspace. This

approach, supported by policy in the London Plan, has successfully protected the critical mass of office floorspace in the City, helping to maintain its primary office function. This broad approach will be maintained. However, there are instances where conversion of office buildings to other uses may assist in making the retention of existing buildings a more attractive investment opportunity, contributing to the 'retrofit first' approach promoted in this Plan. This approach could also assist in delivering a greater range of facilities and uses in the City, complementing the primary function of the Square Mile while helping to deliver more vibrancy and a focus on increasing visitors. To achieve this, the 'retrofit fast track' approach has been introduced, removing the requirement for viability justification for a change of use in the circumstances set out in policy. The alternative uses set out – education, culture and hotels – would all help to create a more vibrant Square Mile.

- 5.3.5 Within and immediately adjacent to identified residential areas, the loss of office floorspace for which there is no ongoing demand may assist in providing housing, to help meet the housing requirement set out in this Plan.

### **How the policy works**

- 5.3.6 Where loss of office is proposed, development will need to meet all the criteria set out in part 1 of the policy, and will need to pursue one of the four routes set out in part 2.
- 5.3.7 Robust evidence of the marketing of the building or site for continued office use over a period of at least 12 months will need to be demonstrated to comply with part 1 of the policy. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site over the period.
- 5.3.8 Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances, as set out in Policy PC1. Viability assessments should include the following:
- Site description;
  - A valuation of the building in its existing use unfettered by any hope value;
  - Total costs of maintaining the building as existing and in the future;
  - Costs of refurbishing or redeveloping the building for office use;
  - Information on rents and capital values;
  - Information on current and recent occupation;
  - Target rates of return (internal rate of return or other appropriate measure); and
  - Sensitivity testing to support the robustness of the report conclusions.

- 5.3.9 Where a change in use is proposed from office floorspace to another use, including complementary uses which enhance the attractiveness of the City, or meet other policy priorities set out in this Plan, then the provision of a full viability assessment may not be required. This would include where complementary uses meet the needs of City workers, residents and visitors and help make City buildings much more open and welcoming to all, or where educational facilities which help attract talented individuals or innovative business to the City are proposed. It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. The priority to reduce carbon emissions and retain embodied carbon set out in Plan also means that changes of use from office to alternative uses which retain embodied carbon may also not require full viability information to justify the loss of office.
- 5.3.10 Further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD.

#### **5.4 Policy OF3: Temporary ‘Meanwhile’ Uses**

1. Temporary use of vacant commercial, business and service buildings or sites (‘meanwhile’ uses) will be encouraged where the proposed use would not result in adverse impacts on the amenity of the surrounding area or the primary business role of the City. Where temporary permission is granted, it will be for a period not exceeding 36 months and the site will revert to its prior lawful use thereafter. Culture and Vibrancy Plans (CVPs) that accompany major developments should explore the potential for meanwhile use.
2. Residential development is not considered an appropriate meanwhile use and will not be permitted.
3. Where a major development would affect existing ground floor or podium level active uses (Class E (a)-(f)), these units should be kept in active use for as long as possible prior to development taking place. CVPs should set out how this will be achieved.

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#### **Reason for the policy**

- 5.4.0 Where buildings or sites in Class E commercial, business or service uses are vacant, and development is not expected in the short term, ‘meanwhile’ or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained, subject to the impact on surrounding uses.
- 5.4.1 Many development sites in the City include shops, restaurants and other active uses within the curtilage. Where leases end prior to redevelopment, these units can remain vacant for long periods, undermining the vibrancy of the area. Meanwhile uses of these spaces prior to redevelopment would help to address this.



## How the policy works

- 5.4.2 'Meanwhile' uses will be granted subject to conditions for a maximum of 36 months, after which the use will revert to its prior lawful use. Applications to extend the period of the 'meanwhile' use or make it permanent will be considered against the relevant policies in the Development Plan and will not be permitted unless it is demonstrated that the permanent loss of the prior lawful use is acceptable.

DRAFT

# 6. Retail

## 6.1 Strategic Policy S5: Retail and active frontages

The City Corporation will seek to make the City's retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City. The City will work with the Business Improvement Districts (BIDs), landowners, operators, and other partners to enrich the 'ground floor economy', encourage active frontages and to provide different offers across different parts of the Square Mile, informed by their character, function and potential.

The City will seek to improve the quantity and quality of retailing and the retail environment in the City of London, promoting the development of the City's four Principal Shopping Centres (PSCs) and the wider distribution of retail by:

1. Focusing new large-scale retail development in the PSCs and encouraging a vibrant retail offer across the Square Mile.
2. Supporting proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand up to 2040.
3. Requiring major retail developments over 2,500m<sup>2</sup> gross floorspace to be located within or near PSCs. Where suitable sites cannot be identified within PSCs, sites immediately adjoining the PSCs should be considered. Other areas of the City will only be considered where no suitable sites are identified within or adjoining the PSCs.
4. Requiring a Retail Impact Assessment for schemes outside PSCs of 2,500m<sup>2</sup> gross floorspace and above. The cumulative impact of retail floorspace will be taken into account in the assessment of planning applications.
5. Focusing comparison and convenience shops within the PSCs, with a broader mix of retail and other active, publicly accessible frontage uses on the peripheries of the centres.
6. Supporting the provision of retail uses that provide active and publicly accessible frontages at street level across the City where they would not detract from the viability and vitality of the PSCs.
7. Supporting a greater diversity of retail uses in all areas, and encourage contextual approaches for the provision of different types of retail use.
8. Retail and other relevant uses will be encouraged to open at evenings and weekends, particularly in and around areas where there are key attractions.

## Reason for the policy

- 6.1.0 The City's retail offer has seen significant challenges in recent years as a result of the Covid-19 pandemic and changing working patterns, as well as notable retail growth in the Liverpool Street area, bolstered by the opening of the Elizabeth line. Over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors, as well as the Square Mile's high accessibility by public transport, create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.
- 6.1.1 Four Principal Shopping Centres (PSCs) are identified in the City Plan. They provide a variety of comparison and convenience shopping in the City of London: Cheapside, Moorgate/Liverpool Street, Fleet Street and Leadenhall Market. Cheapside is considered to be the City's 'high street' and has seen significant retail development in recent years. Moorgate/Liverpool Street PSC has potential to accommodate further retail floorspace.
- 6.1.2 A Retail Needs Assessment undertaken in 2023 identified a need for approximately 192,200m<sup>2</sup> of additional retail floorspace up to 2040. This is an aspirational target based principally on projected employment and visitor number growth in the City. Although the City experienced a reduction in footfall and reduced retail activity as a result of the Covid-19 pandemic, significant growth is forecast over the life of this Plan.
- 6.1.3 The distribution of retail activity throughout the week has also changed, with a shift from a five day a week focus around meeting the needs of workers, to more hybrid working and a concentration of worker-based activity in the middle of the week, although this pattern may shift again depending on workplace attendance. Both domestic and international visitor numbers are expected to grow, in part building on the City Corporation's actions to enhance the City as a leisure and cultural destination, and this trend will support further retail demand and growth.
- 6.1.4 Alongside changes in patterns of demand, the rise of multi-channel retailing and experiential consumption are changing how stores operate and the nature of the consumer experience, which will impact the type, scale and use of stores.
- 6.1.5 The PSCs are recognised in the London Plan as 'CAZ Retail Clusters' that accommodate a range of other commercial uses alongside the retail function (Figure 5). Outside the PSCs, retail units are dispersed across the City.

## How the policy works

- 6.1.6 In applying this policy and others in this chapter, retail includes shops, cafes and restaurants, and services for use by the general public such as hairdressers, banks and building societies, shoe repair and dry cleaning (ie those uses covered by use class E(a)-(c)). Other uses within Class E, such as gyms and health centres and nurseries (use classes E(d)-(e)) can also be

suitable in retail areas, as can a range of other community and cultural uses and those frequented by members of the public, such as public houses, wine bars or drinking establishments. Together this plan refers to all of these uses as active frontages or active frontage uses, provided the design of the premises creates a frontage that facilitates the visual and physical permeability of the building. For safeguarding, nurseries (use Class E(f)) do not usually provide an active frontage but they can be suitable in retail areas as they provide a valuable service and bring vibrancy to an area.

- 6.1.7 There are further opportunities to develop the City's retail offer, allowing for a broad mix of retail and other suitable facilities while maintaining a predominance of comparison and convenience retail uses. The role and status of the four PSCs will be strengthened, encouraging further retail development, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to the retail offer outside of the PSCs, including pedestrian links will encourage visitors and shoppers by creating a welcoming and vibrant environment.
- 6.1.8 Major retail development, defined as development over 2,500m<sup>2</sup> gross floorspace, should locate within PSCs, but where suitable sites are not available sites on the edge of the PSCs should be considered before other areas of the City. Smaller scale retail development will be encouraged throughout the City, where it provides an active frontage and facilities which meet the needs of the City's working population, visitors or local residents. Particular encouragement will be given to convenience retail uses near to residential areas that serve the needs of residents.
- 6.1.9 Active frontages should be provided at street level across the City. Retail uses may be permitted on upper floors of major commercial developments, including in tall buildings, where they provide additional facilities which are accessible to the public and office occupiers.

## **6.2 Policy RE1: Principal Shopping Centres**

1. Principal Shopping Centres (PSCs) are designated frontages defined on the Policies Map. Sites or buildings that form part of a designated frontage are considered to be part of the PSC in their entirety.
2. The role of the PSCs as concentrations of comparison and convenience shopping will be retained. The loss of existing ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages. Where planning permission is required, proposals for changes between retail uses within the PSCs will be assessed against:
  - the contribution the unit makes to the function and character of the PSC;
  - maintain an active frontage; and

- the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

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## **Reason for the policy**

- 6.2.0 Concentrating major new retail development in or near PSCs will ensure that their vitality and viability is maintained and will provide an opportunity to focus retail facilities in the most appropriate areas of the City, enhancing these as shopping destinations for City residents, workers and visitors. In accordance with the definition of PSCs set out in this policy, a sequential or retail impact assessment will not be required for retail development on any site or building that contains a designated frontage in a PSC.
- 6.2.1 Retail uses within the PSCs are predominantly comparison and convenience uses and the City Corporation considers that this predominance should continue, supported by other town centre uses that provide activity at street level and create a welcoming and attractive environment for people to shop, access services and spend leisure time.
- 6.2.2 Following changes to the Use Classes Order introduced in September 2020, existing shops, premises providing financial and professional services to the public, and restaurants and cafes can be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this. Where planning permission is required for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, retail units that are large or in prominent locations should be retained in retail use. The net loss of ground floor retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will be resisted.

## **How the policy works**

- 6.2.3 Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, whilst retaining a predominance of comparison and convenience shopping uses. Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.
- 6.2.4 Each PSC in the City has an individual character, which is described below, and will be considered in the implementation of policy:

## **Cheapside**

- 6.2.5 Cheapside has been the City of London's principal marketplace and high street since early medieval times, and the City Corporation will work with partners

including the Cheapside BID to reinforce its role and character as the City's high street, maintaining a predominance of comparison goods retail including fashion and clothing outlets.

- 6.2.6 There is scope for greater weekend and evening trading and the retail needs assessment shows demand for increased retail floorspace. The City Corporation will work with the Cheapside BID to promote the area as a shopping, business and visitor destination and to support its evolution into a seven day a week destination.
- 6.2.7 Timed restrictions on vehicular access to Bank Junction and the potential for public realm improvements provide an opportunity to achieve greater pedestrian movement and enhance links between Cheapside and retail activity within the Royal Exchange and further east. Public realm improvements at King Edward Street will help to improve links between Cheapside and the Smithfield and Barbican area.
- 6.2.8 The PSC includes Bow Lane, the ground floor of One New Change, Cheapside and Poultry.

#### **Fleet Street**

- 6.2.9 Fleet Street is an important historic thoroughfare, with a rich variety of heritage assets, that acts as the processional route to St Paul's Cathedral. The City Corporation will work with partners including the Fleet Street Quarter BID to revitalise the area, seeking improvements to the public realm and the creation of a more distinctive retail and leisure mix, using heritage assets, meanwhile uses and development opportunities to enliven the area and create more continuous active frontages.
- 6.2.10 Ludgate Hill continues the processional route to the west entrance of the Cathedral, and contains retail that serves visitors and tourists. This City Plan therefore extends the PSC across Ludgate Circus up to St Paul's Churchyard, recognising the important role the area plays in supporting the City's visitor economy.

#### **Leadenhall Market**

- 6.2.11 Leadenhall Market PSC is centred on the iconic Grade II\* listed Victorian market building and includes several surrounding streets. The PSC is located within the southern part of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The City Corporation will work with the EC BID and other partners to help enliven the area including at weekends and evenings, and seek to transform Leadenhall Market to become a primary destination for visitors, capitalising on its unique heritage and nearby emerging attractions such as public elevated spaces.
- 6.2.12 Increased demand arising from the expanding City Cluster workforce will be met through the provision of retail units in the surrounding streets. Opportunities will be taken to improve wayfinding in the area and better revealing the

presence of Leadenhall Market itself, and the accessibility of the area will be improved.

### Moorgate/Liverpool Street

6.2.13 Moorgate/Liverpool Street PSC covers a substantial area between and around two major stations. Retail demand in this PSC will continue to increase due to the improved connectivity arising from the Elizabeth line and development in and around Broadgate, supported by further retail provision along routes between Liverpool Street and Moorgate stations. There is potential for the PSC to expand its 7 day a week role, capitalising on its strong transport accessibility, its proximity for inner London residents and to nearby visitor and cultural attractions such as the Barbican, Old Spitalfields Market, Petticoat Lane, and Shoreditch.

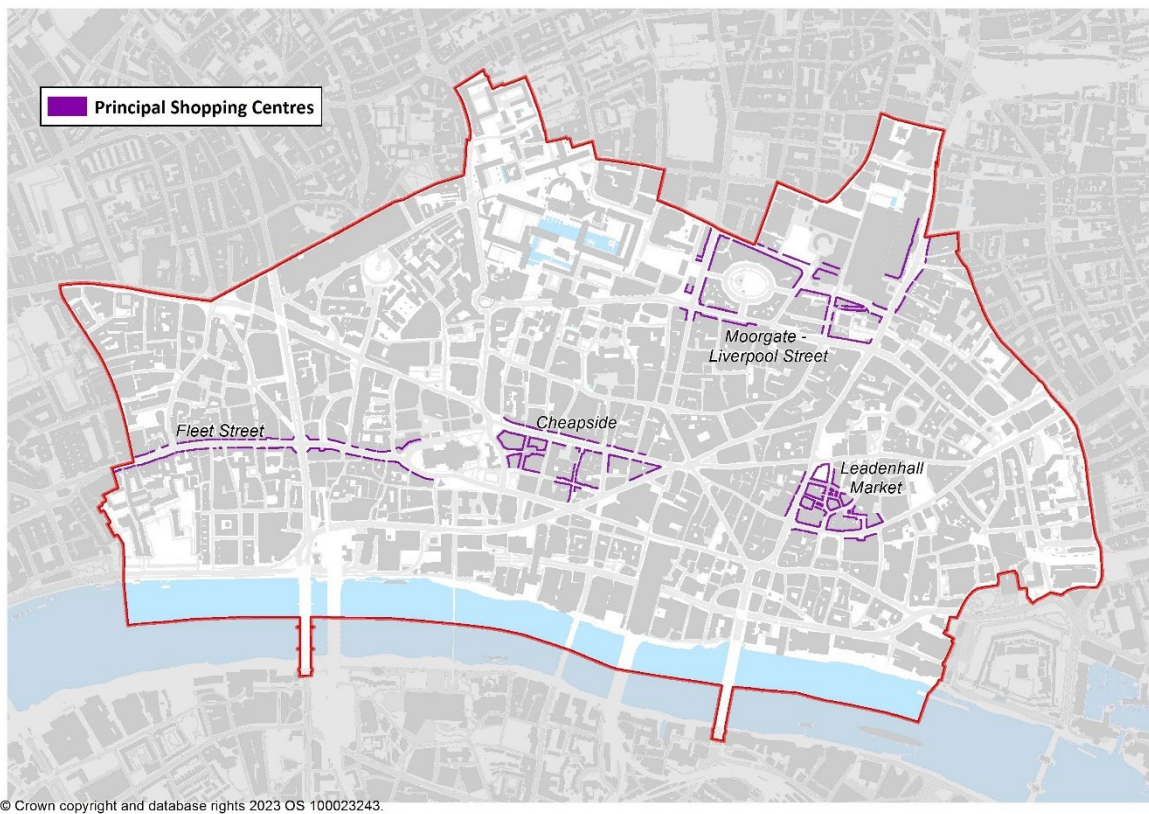


Figure 5: Principal Shopping Centres



## 6.3 Policy RE2: Active frontages

1. Active frontage uses will be encouraged at ground floor level across the City provided they:
    - Do not impact adversely on the amenity of residents, workers and visitors;
    - Do not impact adversely on the operation of office premises; and
    - Would not adversely affect the vitality and viability of the PSCs.
  2. The loss of existing active frontage uses will be resisted. Development that proposes their loss should be supported by evidence demonstrating that there is no demand for active frontage uses and that premises have been actively marketed for a period of no less than 12 months. Alternative uses that would support the retail environment should be provided.
  3. The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required.
- 

### Reason for the policy

- 6.3.0 Many areas of the City contain retail and other active frontage uses that add vibrancy to the area and provide valuable services and leisure opportunities for workers, residents and visitors. Evidence demonstrates that there is substantial future demand for retail floorspace in the City, driven by increased numbers of workers and visitors to the Square Mile. The loss of retail and other active frontage uses across the City would undermine the ability to meet this demand and create a more vibrant City for everyone.
- 6.3.1 Retail units outside of PSCs provide local facilities for the City's workforce, enhance the City's vibrancy, and serve the City's residential communities. Given that most of the City's retail provision is tailored towards City workers, it is important to retain units such as convenience stores that are within easy walking distance of the residential areas and meet the day to day needs of surrounding communities. Unless they are subject to specific planning conditions, such units could be converted to any Class E commercial, business and service use without planning permission.

## 6.4 Policy RE3: Specialist retail uses and clusters

The City Corporation will seek to retain specialist retail uses and premises that are historically and culturally significant to the City of London.

Existing and potential clusters of retail uses that contribute to the character and vibrancy of particular areas will be supported. Development in these areas should enhance and support retail uses in the area and deliver active frontages.

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## **Reason for the policy**

6.4.0 Within the City, there are some specialist retail uses and premises that cannot be found elsewhere, such as the historic Royal Exchange and the London Silver Vaults on Chancery Lane. These uses contribute to the City's visitor economy and to its cultural distinctiveness and should be retained and promoted.

6.4.1 The City also has number of retail clusters outside the PSCs that play an important role in bringing vibrancy to an area or that are an inherent part of the area's character. This includes:

- Premises around Smithfield market, which is going to see substantial change as the new Museum of London relocates to this area.
- The courts and alleys around Cornhill, which require careful steps to ensure they remain (and in some cases become more) vibrant as well as improvements to wayfinding.
- Areas around Middlesex Street and Aldgate High Street, which serve residential communities as well as visitors and local workers. Partnership working with the Aldgate Connect BID and London Borough of Tower Hamlets will be important across the wider area. Additional convenience retail in this area will be supported.
- Areas around Minories, where there is a number of hotels alongside residential communities and emerging student housing. Additional convenience retail in this area will be supported.
- Retail around the Golden Lane and Barbican estates, which play a role in serving the residential communities.
- The south side of Holborn around Chancery Lane tube, which contributes to the wider 'central London frontage' that the London Borough of Camden identify in their Local Plan.
- Many of the City's main thoroughfares and areas around transport hubs include retail uses.

6.4.2 There is potential for areas along the Thames riverfront to enhance the retail and leisure offer, where this would contribute to the creation of a vibrant, inclusive and welcoming riverfront for all.

## **How the policy works**

6.4.3 The City Corporation will work with owners, developers and occupiers to retain specialist retail uses and premises where it can be demonstrated that such uses are of historical or cultural significance. The City Corporation may attach conditions to planning permissions to ensure the retention or replacement of specialist facilities on the same site where they are impacted by development proposals.

## 6.5 Policy RE4: Markets

Proposals for markets and temporary retail pop-ups will be encouraged where they:

1. Are of an appropriate scale and frequency for their location;
2. Would enhance the vitality and viability of existing retail centres within or outside the City;
3. Would not have a significant adverse impact on the amenity of nearby residents or business occupiers;
4. Would not unduly obstruct pedestrian and vehicular movement; and
5. Would not involve the permanent loss of open space or harm the character of that space.

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### Reason for the policy

- 6.5.0 There is an increasing demand for temporary retail pop-ups and street food markets, which can support the local economy by generating increased vibrancy, retail diversity and footfall. These uses provide greater retail choice, enliven the public realm and increase the attractiveness of the City as a place to live, work and visit. Pop-up and meanwhile uses can minimise vacancies of retail premises while a long-term occupier is sought and may be used to animate areas where construction works are taking place.
- 6.5.1 Street trading in the City is regulated by the City Corporation under the City of London Various Powers Act 1987 (as amended), which restricts permanent street trading but allows street trading to take place for temporary periods in specified locations. The exception is on Middlesex Street (Petticoat Lane) Market, which straddles the boundary between the City and London Borough of Tower Hamlets, where licensed trading is permitted between 9am and 2pm on Sundays. Further information on licensing requirements is set out in the City Corporation's Street Trading Policy which is available on the Corporation's website.
- 6.5.2 Temporary street trading, where permitted under the Various Powers Act, can operate for up to 14 days in a calendar year under permitted development rights. Trading for longer periods will require planning permission. Market trading off City streets but within the curtilage of a building will similarly require planning permission if undertaken for a period of more than 14 days in a calendar year.

### How the policy works

- 6.5.3 Proposals for markets or temporary retail pop-ups located within a building or its curtilage should be ancillary to and complement the main use of the site. When assessing proposals for new permanent markets and opportunities for pop-ups,

the City Corporation will consider the potential for significant adverse impacts on the trade of retailers occupying fixed units within the vicinity, together with impacts on the amenity of nearby residents or business occupiers, on pedestrian and vehicular movement or on open spaces.

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# 7. Culture and Visitors

## 7.1 Strategic Policy S6: Culture and Visitors

The City Corporation will maintain and enhance the City of London's cultural, leisure and recreation offer, visitor experiences and infrastructure, and the City's evening and weekend economies to position the Square Mile as a key cultural and leisure destination, by:

1. Encouraging cultural placemaking and creating vibrant and inclusive places that contribute to the experience of living, working and visiting the City while addressing the needs and aspirations of the City's communities;
2. Developing a wide range of cultural, leisure and recreation facilities across the City that offer unique experiences at different times of the day and week, in line with the Culture Planning Framework (CPF), and that support City's role as a visitor destination;
3. Protecting and enhancing existing areas of cultural significance including cultural buildings and leisure and recreation facilities, particularly where they provide an anchor for cultural regeneration or where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City;
4. Providing accessible and inclusive infrastructure and facilities that complement cultural, leisure and recreation uses in the City;
5. Placing heritage at the heart of cultural placemaking, seeking opportunities to embed heritage in the cultural offer and creating spaces and experiences that celebrate the City's rich history, culture and community;
6. Supporting the development of creative industries and encouraging appropriate workspace and digital infrastructure to facilitate their development;
7. Allowing hotel development where it supports the primary business or cultural role of the City;
8. Enabling a vibrant evening and night-time economy, especially in areas of night-time activity and around cultural and tourist attractions where public transport such as the night tube and night buses are available, ensuring that users are well-served with safe and convenient night-time transport;
9. Maintaining the City's existing artworks, statues, memorials and culturally significant items and pursuing opportunities to commission new, high quality artworks in appropriate locations, ensuring they protect and enhance the local character, are accessibly and inclusively designed, and contribute towards enriching the public realm;
10. Maintaining and enhancing the City's open spaces and public realm to accommodate cultural events and activities that are inclusive and accessible to all City communities, and which promote and celebrate City's rich heritage and culture; and

## 11. Encouraging the temporary use of vacant buildings for creative and cultural activities.

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### Reason for the policy

- 7.1.0 London has long been recognised as one of the world's great cultural cities. The definition of culture in the context of the City is broad and inclusive; culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. The City's night-time entertainment facilities – such as clubs, bars and event venues alongside traditional historic public houses – play a crucial role as cultural contributors. They enhance the City's leisure, recreation and cultural offer, providing people with a wholesome experience and a sense of belonging. Community facilities, open spaces, places of worship, and heritage also provide important physical settings for a wide range of cultural, leisure and recreation activities that can attract more visitors.
- 7.1.1 The City's cultural offer forms an integral part of the Square Mile, alongside its financial and business role. Barbican is identified as a strategic night-time location of national or international significance in the London Plan while Cheapside and Liverpool Street are identified as night-time areas of more than local significance in the London Plan. The London Museum with its new home in Smithfield's iconic market buildings will act as a cultural anchor in one of the most historic areas of the Square Mile.
- 7.1.2 Destination City, the City Corporation's flagship strategy, seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
- 7.1.3 The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. The international reputation and high quality of this cultural activity has a critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business. It attracts an increasing number of visitors, with consequent economic benefits, and supports the health and wellbeing of the City workers, residents and visitors.

## How the policy works

- 7.1.4 The City Corporation will require proposals for new development and changes of use to protect existing leisure, arts and cultural facilities where they are needed and where necessary require appropriate replacement. The City Corporation will work with developers and cultural and arts institutions to deliver new facilities and spaces where they enhance the attractiveness of the City as a business and cultural and leisure destination.
- 7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise.

## 7.2 Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities

1. The City Corporation will resist the loss of existing visitor, arts, and cultural facilities, unless:
  - Replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities; or
  - The use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
  - It has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, arts or cultural use at reasonable terms for such a use.

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## Reason for the policy

- 7.2.0 The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition for buildings and sites from commercial uses in the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed before a site will be allowed to change use.



- 7.2.1 There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches, and specialist retail premises such as the Silver Vaults in Chancery Lane.

### **How the policy works**

- 7.2.2 Applicants will be required to demonstrate that an existing visitor, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use). Marketing will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.
- 7.2.3 The City Corporation has published guidelines for determining nominations for Assets of Community Value (ACV) in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest. In determining whether a public house has heritage, cultural, economic or social value, the City Corporation will have regard to those guidelines as well as the characteristics outlined in the London Plan.

## **7.3 Policy CV2: Provision of Arts, Culture and Leisure Facilities**

The City Corporation will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City by:

1. Requiring major developments to submit Culture and Vibrancy Plans setting out how their development will culturally enrich the Square Mile, informed by the City Corporation's Cultural Planning Framework (CPF);
  2. Requiring large scale development proposals of 10,000 sqm or more in size to make provision on-site for arts, culture or leisure facilities;
  3. Requiring major developments below 10,000 sqm in size to make provision for arts, culture or leisure facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards arts, culture and leisure facilities and infrastructure. On-site provision will be preferred, with off-site provision only being appropriate where a specific project has been identified through partnership working.
  4. Encouraging the provision of arts, culture and leisure facilities in historic buildings and spaces where this would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming and accessible for all.
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## **Reason for the policy**

- 7.3.0 The provision of new arts, culture and leisure facilities in the Square Mile is a key mechanism to help realise the City Corporation's Destination City vision. These facilities will not only help to ensure the City becomes a key leisure destination for visitors but also maintains and enhances its position as a global business centre, as well as providing exciting and enriching cultural and leisure experiences for people living and working in and around the Square Mile. To achieve this, it is crucial that major developments contribute towards delivering new cultural and leisure facilities that help enhance the appeal and character of the development and the focal area in which they are located.
- 7.3.1 A review of the Cultural Plans submitted with planning applications show that many major developments already make a significant on-site contribution to the creation of new cultural spaces. Large developments have the greatest flexibility to provide facilities on-site, although many smaller major developments will also be able to accommodate cultural facilities, or to contribute to schemes in the area.

## **How the policy works**

- 7.3.2 Major developments will be required to submit Culture and Vibrancy Plans. These Plans should describe the cultural proposal, including the type and scale of arts, culture or leisure offer, and how it would complement the character of the focal area identified in the CPF.
- 7.3.3 Arts, culture and leisure facilities covers a wide range of uses, including museums, art galleries, libraries and performance venues; community uses that can be used and programmed creatively; integrating cultural activities into new public spaces, including roof gardens and viewing galleries; creating active street-level spaces; revealing spaces within heritage buildings to the public; creating a heritage-led cultural offer; providing affordable space for creative enterprises; encouraging meanwhile uses; providing inclusive and accessible sport and recreation facilities; and incorporating public art in the building's design or within public realm.
- 7.3.4 Developers should consider the operational and management requirements of cultural and leisure facilities provided in new developments prior to approval. A robust management plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage.
- 7.3.5 In some instances, financial contributions can be pooled together to deliver larger projects creating a more significant impact. Where two or more developments are in close proximity to each other, it may be acceptable to pool contributions to provide a larger cultural offer which will have a greater value.

## 7.4 Policy CV3: Provision of Visitor Facilities

The provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm will be encouraged, including:

1. Seating and tables;
2. Structures and landscaping to enable children's play and provide facilities for school groups;
3. Suitable shelter from weather conditions;
4. Well-designed public convenience provision, including changing places toilets, accessible to all users;
5. Well-designed signage, wayfinding and links to visitor facilities and destinations;
6. Temporary pop-up art installations, galleries and spaces in appropriate locations;
7. Performance spaces and animation of key routes where appropriate.

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### Reason for the policy

- 7.4.0 The City attracts large numbers of tourists in certain locations such as around St. Paul's Cathedral and near the Tower of London. This is expected to grow with new attractions including the relocated Museum of London in Smithfield attracting increased numbers of visitors. It is important that the City of London can offer a range of facilities and events which meet the needs of these visitors whilst creating a distinctive look and feel for the City.

### How the policy works

- 7.4.1 The City Corporation will work with developers and arts and culture institutions to ensure that new developments and open spaces near tourist attractions provide facilities that improve the experience for visitors and cater for how visitors use the space. These facilities must be capable of being accommodated without detracting from the setting of the relevant tourist attraction, the wider townscape or residential amenity.

## 7.5 Policy CV4: Hotels

Proposals for hotels and other visitor accommodation will be permitted where they:

1. Comply with the requirements of Policy OF2;
2. Do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
3. Provide active frontages and active uses at ground floor level, including facilities accessible to the public;

4. Are in suitable locations that provide good access to attractions, workplaces and other destinations in and outside the City, including via public transport;
  5. Provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage, and taxis, appropriate to the size and nature of the development;
  6. Are inclusive, meeting London Plan accessibility standards for new hotel bedrooms;
  7. Ensure continuing beneficial use for historic buildings, including enhanced and inclusive public access to and interpretation of that heritage, where appropriate; and
  8. Address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).
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### **Reason for the policy**

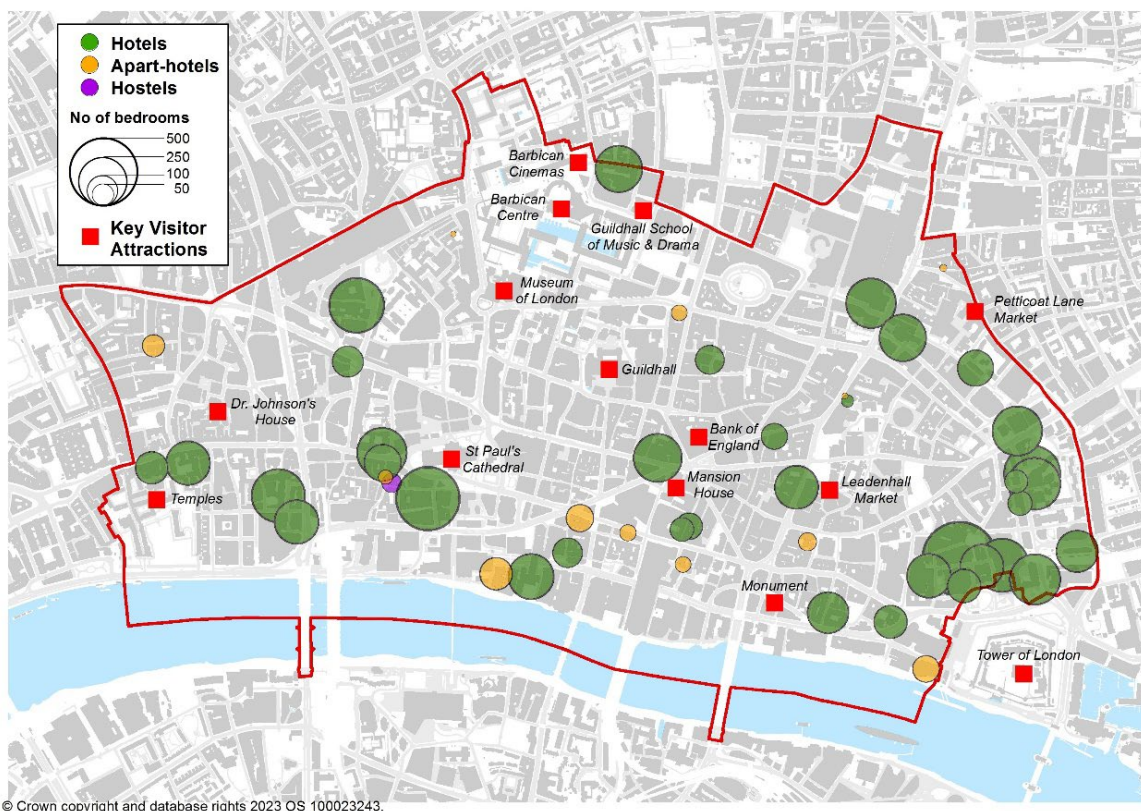
- 7.5.0 While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in 2022 had 43 hotels, apart-hotels and hostels, providing 7,552 bedrooms and a further 33 serviced apartment properties providing 1,551 units. A hotel needs study for the City was carried out in 2022, which assessed the overall need for hotel bedrooms to be 4,012 by 2037. This consists of the forecast pipeline of hotel rooms up to 2030, with additional projected demand of an average of 350 rooms per year beyond that point.
- 7.5.1 Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for business accommodation is likely to increase. Visitor numbers are projected to increase, and the development of the City Corporation's ambition to establish the City as a cultural destination is likely to increase demand for hotel accommodation, particularly in the north west of the City.

### **How the policy works**

- 7.5.2 Policy CV3 applies to hotels, apart-hotels and serviced apartments.
- 7.5.3 Hotel development should complement the primary business function of the City. Proposals will need to demonstrate that they are in accordance with Policy OF2 and the Office Use SPD.
- 7.5.4 Hotel development may be suited to listed buildings, providing an alternative use which could enable significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved inclusive public access to and interpretation of the building's heritage.
- 7.5.5 Hotels can cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will

be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers.

7.5.6 Where new hotels are considered to be acceptable, they should facilitate the creation of active frontages and an inclusive City by providing public access to inclusive facilities such as co-working space, meeting rooms, cafes, restaurants or leisure facilities or other spaces, in order to bring the maximum benefit to the City’s communities. Hotel lobbies that have a significant ground floor presence should be designed as inclusive, welcoming spaces that members of the public who are not staying at the hotel feel welcome to enter and spend time in. Large-scale hotel development may also be suitable locations to provide public toilet facilities and provide ‘cool spaces’ that provide temporary respite during heat waves.



**Figure 6: Hotels and Visitor attractions**

7.5.7 Apart-hotels and serviced accommodation often display characteristics more associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use Classes, depending on their characteristics. Factors that may affect the Use Class include;

- Presence of on-site staff/management;

- Presence of reception, bar or restaurant;
- Provision of cleaning and administrative services;
- Ownership of units/ability to sell on open market; and
- Minimum/maximum lease lengths.

7.5.8 Where apart-hotels and serviced apartments are considered to fall within the C3 (dwelling houses) Use Class, proposals will be assessed in accordance with the housing policies in this Plan, including the requirement for affordable housing. Conditions will be used to ensure units are subject to minimum lease lengths.

7.5.9 For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and may prejudice the business City and put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

## 7.6 Policy CV5: Evening and Night-Time Economy

1. Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
  - the amenity of residents and other noise-sensitive uses;
  - environmental amenity, taking account of the potential for noise, disturbance, waste and odours arising from the operation of the premises, customers arriving at and leaving the premises, and the servicing of the premises.
2. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises and should engage with nearby residential and commercial occupiers.
3. Where new residential development is proposed close to existing evening or night-time uses, the residential development will only be permitted if it includes suitable measures to mitigate potential disturbance and noise and air quality issues for prospective residents, in line with the agent of change principle.

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### Reason for policy

7.6.0 Evening and night-time entertainment is becoming an important part of the City's economy, bolstered by London's move toward becoming a 24-hour destination, growing numbers of workers and visitors, and the encouragement of arts and culture in the City. Expansion of the City's evening and night-time offer will be encouraged where it is compatible with neighbouring uses. Night-time entertainment has the potential to add vibrancy to the Square Mile but can cause noise disturbance to nearby residents as well as other impacts such as

anti-social behaviour, litter and odours. These adverse impacts need to be mitigated.

- 7.6.1 Anti-social behaviour can potentially be reduced by providing a broad range of evening and night-time activities that appeal to different customers, rather than concentrating one type of use in a particular area. This includes extending the opening hours of existing day-time facilities such as shops, cafes and leisure facilities, which can promote customer cross-over and create bridges between the day-time and night-time economy.

### **How the policy works**

- 7.6.2 The City Corporation will require the development responsible for change to manage the impact of that change – the ‘Agent of Change’ principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.
- 7.6.3 Night-time entertainment uses in the City include restaurants and cafes, drinking establishments, hot food takeaways, nightclubs and other related uses which form part of the City’s wider night-time economy.
- 7.6.4 The management of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance.
- 7.6.5 Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment. This is supported by the City Corporation’s Code of Good Practice for Licensed Premises. The City Corporation’s Noise Strategy sets the strategic direction for noise policy within the City of London and outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.
- 7.6.6 The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in disturbance and nuisance from excessive noise, particularly from people



drinking and smoking outside, and arriving or leaving. Policy SA2 (Dispersal Routes) requires applications for night-time uses to include Management Statements setting out proposals for the dispersal of patrons.

- 7.6.7 All planning applications for restaurants and cafes, where planning permission is required, and for drinking establishments, hot food takeaways and related, uses should include information stating the proposed hours of operation. The City Corporation may impose conditions requiring the closure of the premises between the hours of 11pm and 7am where appropriate, such as near noise sensitive uses.
- 7.6.8 Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are expected to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity.
- 7.6.9 Proposals for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:
- hours of closure to protect amenity;
  - noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as soundproofing, noise controls and double entry lobbies;
  - the dispersal of patrons so as not to cause disturbance to residents;
  - arrangements for the storage, handling and disposal of waste;
  - a timed programme for deliveries and collections and other servicing arrangements;
  - measures to deal with the emission of odours; and
  - location of ventilation ducts and plant.
- 7.6.10 Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule. It is recognised that it may not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers are known.

7.6.11 To safeguard quiet times and amenity, particularly for residents and other noise-sensitive uses, the City Corporation will attach planning conditions or seek s106 planning obligations to ensure compliance with agreed Management Statements. The City Corporation will normally apply conditions to limit the hours of operation where there is potential for unacceptable disturbance to local residents and others. Each case will be considered in relation to its locality and the need to strike a balance between the benefits to the City of night-time entertainment and the risk of disturbance to local residents, workers and others.

## **7.7 Policy CV6: Public Art**

1. The City's public realm and distinctive identity will be enhanced by:

- encouraging the provision of new permanent, temporary, inclusive, diverse and high quality artworks in appropriate locations in the City on public and private land;
- protecting existing works of art, statues, memorials and other objects of cultural significance;
- ensuring that financial provision is made for the continuing maintenance of new public art;
- requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

2. The location of new and relocated artworks must take into consideration the health and safety of pedestrians, particularly disabled people, and other road users.

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### **Reason for the policy**

7.7.0 Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place and local identity and is a form of community infrastructure. Public art includes temporary installations and non-physical works such as soundscapes.

7.7.1 Where appropriate, artworks can be multi-functional so that a variety of community needs can be met. Artworks may provide shelter from the weather, include sensory elements and provide play opportunities.

7.7.2 There are several arts events held regularly including Sculpture in the City which forms a free public trail of works of art throughout the City.

7.7.3 The proposed public art must respect, and not detract from, the surrounding environment. Objects of cultural significance may include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.

- 7.7.4 Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided, and consideration given to ensuring that people with visual or mobility impairments are not placed in danger. Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers.

### **How the policy works**

- 7.7.5 The City Arts Initiative (CAI) group advises the City Corporation on the artistic merit, siting, setting and appropriateness of public art proposals in the City. Temporary works of art (in situ for less than 8 weeks), which do not require planning permission, will be considered by the CAI group.
- 7.7.6 Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design of development and applicants should work with artists at an early stage of design. Artworks and memorials should be appropriate to their location, including the history and context and the use of a site. Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal agreement. Where works of art are on private land, it is expected that those pieces will be maintained to a high standard by the landowner. The City Corporation may seek contributions through s106 obligations towards the provision of new public art and the future maintenance of public art.

# 8. Infrastructure

## 8.1 Strategic Policy S7: Infrastructure and Utilities

1. To coordinate and facilitate infrastructure planning and delivery and the transition towards a zero carbon and climate resilient City, all development should:
  - Minimise the demand for power, water and utility services;
  - Incorporate sustainable building design and demand management measures;
  - Connect to existing pipe subways where feasible, particularly where there is pipe and cable congestion under the streets;
  - Seek to provide the latest and best quality utility infrastructure and connections to serve the development.
2. Developers must engage with infrastructure providers at an early stage of design to ensure that the infrastructure needs arising from the construction and operation of new development are addressed and required utility networks and connections are in place in time to serve the development.
3. Existing essential utilities and telecommunications infrastructure will be protected from development unless it is no longer required or will be adequately relocated.
4. The improvement and extension of utilities infrastructure should be designed and sited to minimise adverse impacts on the visual amenity, character and appearance of the City and its heritage assets.

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### Reason for the policy

- 8.1.0 Infrastructure is a vital component of modern cities. Maintaining high quality and sustainable utilities provision in the Square Mile is crucial for the City to remain competitive and address climate challenges.
- 8.1.1 There are specific challenges to providing the infrastructure needed to support existing activity in the City and the development set out in this Plan:
  - The dense concentration of business activity in the City means that high demand is concentrated in a small geographical area.
  - There is a legacy of congested cable routes under the City's streets.
  - Delivery of new infrastructure and improvements to existing networks may result in temporary disruption to businesses, residents and visitors.

- Energy and telecoms demands are increasing and there is a need to continually improve and upgrade networks to meet this changing demand in a sustainable way, which does not compromise the City's trajectory towards zero carbon.

### **How the policy works**

- 8.1.2 The City Corporation has established strong links with the various infrastructure providers that service the City, including Thames Water, UK Power Networks, Cadent Gas, Citigen and telecoms providers. The City Corporation will seek to retain and strengthen these links, working with all providers and regulators, where appropriate. The City Corporation is developing a Utility Infrastructure Strategy, which sets out the steps that will be taken, including through partnership working, to ensure the City's utilities infrastructure remains fit for purpose and future proofed.
- 8.1.3 Developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.
- 8.1.4 Utilities infrastructure comprises the provision of electricity, gas, water, sewerage, sustainable drainage (SuDS), telecommunications, including wired and wireless infrastructure, decentralised energy networks and the pipe subway networks that accommodate such infrastructure.

## **8.2 Policy IN1: Infrastructure provision and connection**

1. Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for:
- Electricity, gas and water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands. Temporary building supply for the construction phase should be identified in conjunction with electricity providers including the estimated load capacity, substations and route for supply;
  - Heating and cooling demand and viability of provision. Designs should incorporate connections to existing decentralised energy networks where feasible;
  - Digital and telecommunications network demand, including full fibre wired and wireless infrastructure in line with the Mayor of London's 'Wired Score' connectivity rating or equivalent, planning for dual entry through communal entry chambers and flexibility to address future technological improvements;
  - Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

Where it is not possible to provide detail at application stage, planning conditions and/or obligations will be used to secure the provision of such detail.

2. To avoid delays to prospective tenants, developers should consider pre-installing telco communal chambers or other innovative solutions to help facilitate communications networks, into the new development.
3. Developers should conduct mobile signal tests within the development and consider the need for provider neutral in-building mobile solutions where coverage is poor.
4. Development should aim to avoid reducing mobile connectivity in surrounding areas, and if that is not possible suitable mitigation measures will be required. Provision should be made on buildings or in the public realm to accommodate well designed and located mobile digital infrastructure.

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### **Reason for the policy**

- 8.2.0 The dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and district heating and cooling networks are of particular importance. Congested cable routes traverse the City under its streets. Energy demands are increasing, particularly to provide air conditioning to counter increased warming and the delivery of upgraded ICT networks required by financial and business services. The impact of Covid-19 has highlighted the importance of digital connectivity and the transition to an increasingly digital-reliant economy.
- 8.2.1 The City Corporation's Utilities Infrastructure Strategy sets out in more detail the infrastructure projects that are under construction or required.

### **How this policy works**

- 8.2.2 Developers must liaise with utility providers and adopt best practice in assessing and improving connectivity within developments. Connection layouts and future proofing should be considered in the design of the development.
- 8.2.3 Addressing air pollution is a fundamental concern for the City Corporation. Developers should engage with energy providers prior to commencement of development works to ensure the availability of temporary building supplies, avoiding the need for diesel generators to provide electricity.
- 8.2.4 Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors. Developers must co-operate with infrastructure providers to minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction.
- 8.2.5 It is essential for the City to be digitally connected and responsive to the changing requirements of business, equipping businesses to benefit from the digital transformation stimulated by the Covid-19 pandemic. Buildings must be

equipped to meet the digital needs of current and future occupiers. Developers will be expected to undertake an assessment of the connectivity of major new office buildings or refurbishments, using a wired certification such as WiredScore. Development should result in an improvement in the City's digital connectivity.

- 8.2.6 Mobile connectivity within and around buildings is critical to the City of London. Developers will need to ensure that their buildings do not worsen existing signal strength in the area and consider the provision of in-building solutions where signal strength is poor. The roll out of 5G across the City will require additional mobile infrastructure and suitably located cells. Where feasible, provision for new cells should be incorporated into new development. Where this is not feasible, provision should be made for additional cells to be located in the public realm, on existing street furniture or elsewhere as appropriate.
- 8.2.7 The City Corporation will encourage the improvement and extension of utilities networks to ensure that the City uses the latest technology and continues to provide good quality services for businesses, residents, students and visitors. The City Corporation's City Developer Guidelines for Incoming Utility Services provides guidance on best practice.

### **8.3 Policy IN2: Infrastructure Capacity**

1. Development must not lead to capacity or reliability issues in the surrounding area and capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.
2. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.
3. Developers are required to demonstrate, through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation.

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#### **Reason for the policy**

- 8.3.0 Early engagement with infrastructure providers is essential to ensure that there is adequate capacity to serve the development during its construction and operational phases.

#### **How this policy works**

- 8.3.1 The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and should include evidence of engagement with providers.



- 8.3.2 Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote and contribute towards a zero carbon-economy, through smart buildings and incorporating alternative solutions into the design. It will be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure, which may involve studies being undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.
- 8.3.3 Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in underutilisation of infrastructure. The cumulative impacts should be considered through discussion with providers and pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.
- 8.3.4 Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.
- 8.3.5 Redundant plant should be removed where possible to facilitate future infrastructure connections. Redundant infrastructure within the public realm, such as telephone boxes, should be removed unless it is of heritage interest.

#### **8.4 Policy IN3: Pipe Subways**

Developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes where these are available. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

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##### **Reason for the policy**

- 8.4.0 Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways would provide greater capacity for pipes and cables, reducing the need for street works which often cause disruption. Pipe subways accommodate gas and watermains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then not easily accessible.

## How the policy works

- 8.4.1 The City Corporation will seek the expansion and integration of development into the pipe subway network where there is sufficient evidence to demonstrate that services to development would be better integrated within an established pipe subway. Given the cost of installing new pipe subways, it is especially important to make efficient use of the existing network. Developments which are located adjacent to existing pipe subways will normally be expected to install connections.

DRAFT

# 9. Design

## 9.1 Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high quality buildings, streets and spaces. Design solutions should make effective use of limited land and contribute towards vibrancy, inclusion, wellbeing and a greener, net zero carbon City, through development that:

### **Sustainable design**

1. Takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options;
2. Seeks opportunities to refurbish existing buildings, improving their environmental performance;
3. Minimises whole life-cycle carbon and contributes towards a net zero carbon City;
4. Delivers world class sustainable buildings that are adaptable and informed by circular economy principles and that treat materials as a resource;
5. Embeds climate resilience into design and contributes to the resilience of the Square Mile; and
6. Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial carbon emissions.

### **Form and Layout**

7. Optimises site capacity, informed by the character of the area and its potential for growth;
8. Delivers buildings and spaces that have the right scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study;
9. Optimises pedestrian movement by maximising permeability, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys; and
10. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;

## **Experience**

11. Provides an appropriate mix of uses that contribute to the creation of a vibrant City;
12. Places people at the heart of design, creating buildings and spaces with a strong sense of belonging;
13. Optimises microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views;
14. Delivers street level building frontages which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
15. Optimises the amount and connectivity of green infrastructure and, biodiversity and public amenity space and urban greening, and provides these in ways that are integral to the architecture and site design;
16. Delivers inclusive buildings, streets and spaces that meet the access needs of all the City's communities irrespective of background or circumstance;
17. Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter open spaces, roof terraces, cultural offers and other spaces, including in tall buildings and along the river and around City landmarks;
18. Supports health and wellbeing within the City's communities; and
19. Is informed by early and meaningful stakeholder engagement, proportionate to the scale and type of development proposed.

## **Quality and character**

20. Delivers high quality design, which is visually interesting, well-proportioned and well-detailed and conserves and enhances the townscape character and appearance of the City, and its historic environment, and takes into account cross boundary impacts of the neighbouring boroughs;
21. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
22. Considers lighting as an integral part of the design process, ensuring that internal and external lighting provides the right light in the right place at the right time;
23. Incorporates signage of an appropriate siting, size, form, appearance and illumination within the building's architecture;
24. Incorporates necessary security and safety measures as an integral part of the design; and

25. Ensures that the building design concept is maintained from permission through to completion of a project.

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### **Reason for the policy**

- 9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings. Business occupiers are seeking buildings that are designed with high sustainability, accessibility and inclusion, and wellness credentials, and for these to be reflected in the appearance, functioning and design of buildings and their relationship to the wider context.
- 9.1.1 The built environment is a major contributor to carbon emissions. Development should not only seek to minimise emissions but also find opportunities to improve wider sustainability. Retrofitting existing buildings will in many cases result in lower whole life-cycle carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials. As our climate changes, development must play a role in helping to make the City more resilient to extreme weather conditions and the impact of changing climatic conditions.
- 9.1.2 Development has a significant role to play in enhancing the public life of the Square Mile and making it more welcoming for everyone through delivering inclusive and accessible public spaces, vibrancy, destinations, experiences and leisure opportunities as an integral part of new development.

### **How the policy works**

- 9.1.3 The design approach to each site in the City will be unique and there is a need to consider a broad range of factors through an iterative design process. While sites won't share a singular route through the design process, this City Plan places significant importance on achieving sustainable development through a 'retrofit first' approach. An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the whole lifecycle carbon of different development approaches.
- 9.1.4 Options appraisals should also be informed by the potential for wider environmental benefits before considering the many wider design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.

## 9.2 Policy DE1: Sustainable Design

1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.
2. All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach for the site.
3. Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment.
4. Where new buildings are the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area.
5. Innovative design, materials, construction, and technologies should be used to deliver highest standards of environmental sustainability.
6. Applicants must ensure that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.

### Circular economy design approaches

7. Development should be designed to incorporate circular economy principles throughout the life cycle of the building through:
  - Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;
  - Floorspace adaptability to maximise the lifespan of buildings;
  - Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources;
  - Designing for disassembly, reuse and recycling of deconstruction materials;
  - Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and
  - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.

### Sustainability standards

8. Proposals for major development will be required to:

- Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). Climate resilience credit should be achieved for the waste category;
- Commit to achieving a minimum NABERS UK rating of 5 stars;
- Demonstrate that London Plan guidance on carbon emissions and air quality requirements have been met on site. In exceptional circumstances, where standards cannot be met on site, carbon offsetting will be required to account for the shortfall. This will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects;
- Retain existing buildings and structures where feasible to reduce embodied carbon emissions and waste;
- Demonstrate climate resilience in building and landscape design;
- Incorporate collective infrastructure such as heating and cooling networks, smart grids and collective renewable energy storage (for example batteries) wherever possible, to contribute to a net zero carbon, zero-waste, climate resilient City; and
- Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments.

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## Reason for the policy

- 9.2.0 The factors driving sustainable development are increasing, impacting both global and local businesses as well as workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City’s priorities:
- Energy, carbon emissions and air pollutants – reducing emissions and moving to a net zero-carbon city by 2040, in line with the requirements of the City Corporation’s Climate Action Strategy;
  - Water – reducing water use in an area of serious water stress;
  - Pollution – reducing exposure to poor air quality;
  - Materials – retaining embodied carbon in existing buildings and materials, and improving resource efficiency.
- 9.2.1 Social and environmental responsibility is high on the agenda for many City businesses and their workforce and a working environment that supports these goals is essential for the City’s future.
- 9.2.2 The City of London Climate Action Strategy provides evidence for the trajectory to a net zero carbon City by 2040. The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen



infrastructure are essential elements in the delivery of the net zero carbon City, where decarbonised electricity that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides. Therefore, connection to these networks is expected wherever feasible. This will also reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms.

- 9.2.3 As new developments are large consumers of resources and materials, the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition. Proposals for substantial demolition and reconstruction should have regard to the whole-life carbon impact, resource and energy use, when compared to the existing building, and must justify why redevelopment and new build is the most sustainable and suitable approach. All development should ensure the reduction, reuse or recycling of resources and materials, and minimise energy use and emissions that contribute to climate change.
- 9.2.4 The application of sustainability standards through this Plan will contribute to the achievement of the objectives of the City's Climate Action Strategy, however, guidance in the area of sustainable development is rapidly evolving and applicants should use the most up to date guidance to inform their planning proposals.
- 9.2.5 The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer, waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.

### **How the policy works**

- 9.2.6 The approach to retention and/or redevelopment, built form, whole life-cycle carbon and circular economy for the development should be shaped on the basis of the insights derived from the carbon options assessment. Applicants should work collaboratively through the carbon options process to establish the most sustainable and suitable approach for the site. Applicants should demonstrate that they have taken into account principles of sustainable design and that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.
- 9.2.7 The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are subject to this policy where proposed works constitute development.

9.2.8 Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development.

9.2.9 For major development the following information should be provided:

- A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
- An energy assessment in line with the Mayor of London's Energy Planning Guidance.
- An options appraisal following the City Corporation's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits.
- An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
- Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.
- Whole life cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options Guidance Planning Advice Note, fully exploring opportunities to minimise embodied and operational carbon emissions.

**Extensions:**

- If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements.

**For minor development**

- Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.

## **Circular design approaches**

### **EIA development**

- 9.2.10 For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should demonstrate how circular economy principles have been incorporated into the development, fully addressing how Construction, Demolition and Excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.
- 9.2.11 A Circular Economy Statement and the WLC carbon assessment following the London Plan guidance should be submitted for all EIA development.

### **Major development**

- 9.2.12 For all other Major development proposals, the Sustainability Statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.
- 9.2.13 A Circular Economy Statement following the London Plan guidance should be submitted for all Major development.

### **All other development**

- 9.2.14 For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.

## **9.3 Policy DE2: Design Quality**

1. Development should be of an exemplar standard of design, aesthetics and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.
2. The design of new development must ensure that:
  - The layout, form, scale, massing and appearance of schemes are appropriate in relation to their surroundings and have due regard to the scale, height,

building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area;

- The site layout takes account of established and potential pedestrian desire lines enhancing pedestrian permeability;
- Buildings and public spaces are inclusive and accessible for everyone;
- The architecture and urban design function well, are visually attractive with high quality detailing, finishes and materials, and enrich the overall quality of the area for the long term;
- Elevations have active, engaging and welcoming street frontages;
- The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements;
- Innovative design approaches are used to create high quality buildings that meet high sustainability standards, and integrate well with the surroundings;
- It is constructed using appropriate, high quality, low carbon, sustainable and durable materials;
- It avoids unacceptable wind, loss of daylight and sunlight and thermal comfort impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- The proposed uses and activities are accommodated within the curtilage of the development and do not rely on use of the public realm, including the use of public highway;
- The plant and building services equipment are fully screened from view and integrated into the design of the building such that there are no adverse impacts on amenity in surrounding areas;
- The form, profile and appearance of the roofscape adds visual interest and complements the building.

3. Applicants will be encouraged to undertake meaningful developer-led engagement before submitting their planning application in line with the City Corporation's Developer Engagement Guidance;

4. Applicants will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology. These visualisations should be used to inform pre-application and post application consultation with local communities and stakeholders.

5. Applicants will be required to ensure the quality of the approved development is not materially diminished between permission and completion as a result of changes to the permitted to scheme.

## **Reason for the policy**

- 9.3.0 Buildings and spaces around buildings affect us all – they are where we live, work and spend our leisure time; they shape our experiences as we spend time in them and move around them. Therefore central to delivering the right kind of growth, it is important to ensure that buildings are of high quality design;
- 9.3.1 Given the exceptional quality of the City’s built environment, it’s essential for new developments to capture and enhance the qualities and characteristics that make it a special place; The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are all characteristic of, and combine to produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

## **How the policy works**

- 9.3.2 This policy expects applicants to approach the design of new buildings, extensions or modifications to existing buildings in an interesting, innovative and appropriate manner. Whilst no particular architectural style is encouraged, the expectation is that every scheme should be of the highest quality meeting the requirements set out in this policy and should be based on a sound understanding of the site and its context. A series of key characteristic features have been identified in the City’s Character Areas Study, which should be applied to understand the underlying character of the different areas of the City. In assessing development proposals, careful consideration will be given to the scale, form, massing, appearance and those distinctive features that contribute to the area’s unique identity and local character.
- 9.3.3 Good design is a key aspect for creating places, buildings or spaces that work well for everyone, look good, last long and can adapt to the changing needs of future generations. Making the right choices at all levels of the design process is therefore very important. The development proposals will be required to clearly articulate the design evolution from the conceptual stage to the final product. This narrative should be set out in the Design and Access Statement and should address the key design aspects outlined in the National Design Guidance:
- the layout
  - the form
  - the scale of buildings
  - their appearance
  - landscape
  - materials
  - their detailing

- 9.3.4 Wind conditions and solar glare may have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions, thermal comfort and solar glare. Any adverse impacts should be minimised and unavoidable impacts will need to be mitigated. Appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published guidelines for developers on wind microclimate studies required to support planning applications. Further guidance is available on solar glare, solar convergence and daylight and sunlight impacts of development.
- 9.3.5 The design and implementation of building extensions and alterations, such as entrances and windows, are important because they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated into the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.
- 9.3.6 In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Blank frontages and ventilation louvres should be avoided. Ventilation louvres, where necessary, should be located away from busy streets.
- 9.3.7 Plant should be located below ground. Where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.
- 9.3.8 Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas.
- 9.3.9 Ventilation or extraction systems should be routed internally, and extensive or unsightly external ducting will not normally be permitted. Provision must be made within the building for services and ducting to and from all uses. Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, developers and/or occupiers should

investigate the potential to vent emissions to the roof. Developers should provide suitable rooftop ventilation, where appropriate. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways.

## **9.4 Policy DE3: Public Realm**

The City Corporation will work in partnership with developers, Transport for London and Business Improvement Districts (BIDs), and other key stakeholders to design and implement schemes for the enhancement of streets and spaces and the creation of new spaces including public squares, parks, open spaces, viewing galleries, rooftops, forecourts, streets, courts, alleyways, routes and spaces between buildings.

### **Public Realm Design**

Public realm schemes, must have regard to:

1. The need to provide high quality, inclusive, welcoming, well designed, safe, and functional public realm that takes into account how people will use the space;
2. The wellbeing of users ensuring appropriate shade and shelter, provision of areas with access to direct sunlight and taking into consideration microclimatic conditions including temperature, wind, exposure to noise, air pollution to create places that encourage people to dwell and spend time;
3. The predominant use and function of the space and adjacent spaces;
4. The use of sustainable natural and high quality materials, avoiding an excessive range whilst harmonising the proposals with the surroundings and the materials used throughout the City;
5. The need to increase the provision of green infrastructure, including tree planting, urban greening, soft landscaping and the delivery of net gains in biodiversity, and to link up existing habitats, green spaces and routes to provide green corridors;
6. The City's heritage, identifying, and retaining, and better revealing features that contribute positively to the character, cultural and leisure experience and appearance of the City;
7. The need to integrate high quality public art as part of the public realm design;
8. The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate rainwater management;
9. The need to improve pedestrian amenity, ensuring that streets and walkways remain uncluttered and encourage walking, cycling and wheeling;
10. The promotion of active travel, delivering interventions which improve the design of streets and spaces for pedestrians and cyclists in line with the Healthy Streets Approach;



11. The sensitive co-ordination of lighting with the overall design of the scheme;
12. The need to provide public amenities including seating and free water drinking fountains.

### **Inclusive and Accessible Public Realm**

The public realm should be welcoming, inclusive and accessible to all; it should be free to use and access.

Development proposals should:

1. Provide inclusive and accessible public realm that meets the existing and future needs of all user groups;
2. Ensure public spaces are open, welcoming, inclusive, free to use, and fully publicly accessible and that appropriate management and operational arrangements are in place. Where the development creates new public realm or affects the use of existing public realm, it should be ensured that public access to the space is maximised and the rules governing the space are minimised to those required for its safe management, in accordance with the Mayor of London's Public London Charter. A Management Plan should be provided setting out how the space will be used and managed at different times of the day and different days of the week.
3. Ensure public spaces are free to use and access and align with the principles contained in the Mayor's Public London Charter; any restrictions to public access will only be allowed in exceptional circumstances, subject to a legal agreement and should be the minimum necessary, appropriate and reasonable.

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### **Reason for the policy**

- 9.4.0 The City of London is a dense urban environment, with a limited amount of public realm. Most streets and public spaces accommodate a high level of pedestrian footfall and perform a variety of functions above and beyond accommodating the movement of people. The City's streets and public spaces are where public life takes place, where workers, residents and visitors experience the City as a whole. Given the limited amount of space available at ground floor level in the City, public realm proposals must make effective use of the constrained land resource and be of the highest design quality, maximising benefits for the public.
- 9.4.1 To attract a greater and more diverse range of people to the city at different times of the day and on different days of the week, the design of the public realm must cater for a wide variety of requirements. The management and curation of the public realm influences how it is used and its appeals to different user groups. Management and maintenance of public space should be limited to minimise rules governing public spaces to avoid management regimes being

implemented that set unnecessary rules for how people should behave. Whether publicly or privately owned, public realm should be open, free to use, welcoming and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are essential for safe management of the space.

- 9.4.2 High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

### **How the policy works**

- 9.4.3 The City Corporation will actively promote schemes for the enhancement of the public realm in accordance with the Healthy Streets Approach, the Mayor of London's Public London Charter, the Mayor of London's Streetscape Guidance, the City of London Public Realm SPD, the City of London Public Realm Toolkit, the City of London Transport Strategy and the Climate Action Strategy.
- 9.4.4 Developers will be required to demonstrate that public realm enhancements will improve the function and appearance of the space. An assessment will be required to demonstrate how the development will function in terms of the use of the public space, pedestrian desire lines, and potential congestion or conflict, and what public realm enhancements will be required to deliver a functional, inclusive, accessible, safe and attractive public space.
- 9.4.5 Public realm design should follow best practice place-making principles, by creating site layouts that positively respond to the context and microclimatic conditions, and using materials that harmonise spaces. Development proposals that deliver new or improved high quality public space will be encouraged and the provision of outdoor public space at ground level will be prioritised. There will be a particular focus on creating new routes and spaces that link the public realm network, connect key destinations in the City, and provide attractive walking and cycling routes and public spaces. These spaces should encourage people to dwell and spend time, and provide amenity for people's health and well-being.
- 9.4.6 The provision of tree planting will be encouraged to improve climate resilience, provide shade and visual amenity. It should be ensured that tree planting is feasible with below ground constraints.
- 9.4.7 A draft public realm management plan must be provided at the pre-application stage, outlining how the public realm will be designed and managed in accordance with the London Plan and the Public London Charter principles. Public realm management plans will be secured through s106 agreements. These plans should ensure that the design, and management regime that govern public spaces maximises public accessibility and supports the requirements of this policy. It should demonstrate how the public space will

operate and be managed at different times of the day, and at different times of the week.

- 9.4.8 Through site analysis and public engagement, developers should identify existing uses and users of public space and develop proposals that support and encourage the existing and future use of the space, while seeking to ensure public spaces are inclusive and accessible for all.
- 9.4.9 Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, the Mayor of London's Streetscape Guidance and the Public London Charter.
- 9.4.10 The City Corporation will undertake public realm enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the Community Infrastructure Levy and funding from external sources to deliver enhancement works.

## **9.5 Policy DE4: Terraces and Elevated Public Spaces**

1. Roof terraces will be encouraged where:

- The roof terrace is visually integrated into the overall design of the building when seen from both street level and elevated viewpoints;
- There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;
- Historic or locally distinctive roof forms, features or structures can be retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace optimises the potential for urban greening;
- Emissions from combustion plant will not affect users of the terrace.

2. Where roof terraces and elevated public spaces are proposed, safety and security risks must be addressed at the design stage and space for security checks and any hostile vehicle mitigation incorporated into the development, where required.

3. Requiring all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City's spectacular skyline and views.

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## **Reason for the policy**

9.5.0 Roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

## **How the policy works**

- 9.5.1 The City Corporation encourages proposals for roof gardens and terraces where they are sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive and where they do not impact adversely on residential amenity. There should be no impact on strategic or locally protected views.
- 9.5.2 Where roof terraces and gardens are publicly accessible, entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Security implications should be considered at the design stage of the development, including making provision for security checks within the development and hostile vehicle mitigation, where required. Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels or result in unacceptable light spillage in areas with residents or other sensitive uses. Appropriate safety features should be included to reduce the potential for suicide or falling from buildings. The City Corporation has adopted a Planning Advice Note on Preventing Suicides in High Rise Buildings and Structures to advise developers on best practice to reduce the potential for suicides from tall buildings. The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.
- 9.5.3 Public access to tall buildings within the City is important in creating an inclusive city. Tall buildings should provide publicly accessible, step-free areas that are free to enter and inclusively designed. These may include public viewing galleries at upper levels or other forms of open space provision and may provide retail, leisure or educational facilities to enhance their attraction, where this would not undermine the inclusivity of the space.

## **9.6 Policy DE5: Shopfronts**

Shopfronts should be of a high standard of design and appearance to create an attractive and welcoming retail and leisure experience on City streets. Inappropriate designs and alterations will be resisted. Shopfront proposals should:

1. Help to create active frontages, designed in ways that facilitate the visual and physical permeability of the building;
  2. Respect the quality and architectural contribution of any existing shopfront;
  3. Maintain the relationship between the shopfront, any fascia, the building and its context;
  4. Use materials which are sympathetic to the wider context and are of high quality;
  5. Ensure that signage is in appropriate locations and in proportion to the shopfront;
  6. Take into account the impact of louvres, plant and access to refuse storage;
  7. Consider the potential to use awnings and canopies to provide shade and mitigate against adverse climate impacts. Where they are provided, they should not harm the appearance of the shopfront, obstruct architectural features or views and should be in compliance with highway requirements;
  8. Avoid external shutters and contain alternative security measures, where required;
  9. Avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
  10. Ensure that the design is inclusive incorporating level entrances and adequate door widths; and
  11. Ensure that internal shop lighting does not create inappropriate light spillage into the public realm.
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### **Reason for the policy**

- 9.6.0 Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.
- 9.6.1 Existing shopfronts should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

### **How the policy works**

- 9.6.2 New shopfront proposals should relate to the upper floors of the building and surrounding buildings, providing consistency with neighbouring premises, where appropriate. New shopfronts should utilise high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth) that are out of proportion or scale with the shopfront or have a detrimental visual effect on the building or the street scene.

- 9.6.3 Modification to shopfronts and shopfront designs to incorporate louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building where they cannot be accommodated in less sensitive elevations. The use of awnings and canopies should be considered to address climate impacts, where appropriate, and should be integrated into the shopfront design in relation to size, location and materials.
- 9.6.4 Fully openable shopfronts and large serving openings may be refused where they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.
- 9.6.5 Required security measures should be internal to limit their visual impact on shopfronts and deliver an active frontage. External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts. Internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.

Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all. Where alterations would have an impact on heritage assets, all feasible options should be explored to provide the highest levels of inclusion.

## **9.7 Policy DE6: Advertisements**

1. Advertising must be of a high standard of design, restrained in amount and in keeping with the character of the City.
2. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted.
3. Advertising flags and banners may be appropriate to support cultural institutions.
4. High quality temporary advertising associated with one-off events may be appropriate, where it would contribute to the vibrancy of the Square Mile and make a positive contribution to amenity and public safety.

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### **Reason for the policy**

- 9.7.0 To protect and enhance the character of the City's streets, the City Corporation considers that advertising material should be restrained in quantity and form. Poor quality advertisements harm the street scene and the unique character of the City of London. The City Corporation will exercise advertisement control

having regard to visual amenity and public safety and will seek improvements to the design of advertisements, where necessary.

## **How the policy works**

- 9.7.1 Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the character of the City. The display of advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however, provide an opportunity to add interest to the street scene by including images and information about the development under construction. Artificial greening on hoardings should be avoided. Further guidance is contained in the City Corporation's Hoardings Advice Note and in the City of London's Considerate Contractor Scheme Code of Conduct.
- 9.7.2 The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.
- 9.7.3 Particular care will be necessary with advertisements on or in the setting of listed buildings and within conservation areas. Internal illumination of advertisements in such areas will not normally be permitted.
- 9.7.4 Advertisements above ground level are frequently detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features and the City's streetscape and skyline. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 9.7.5 Appropriate action will be taken to have unauthorised advertisements removed. The City Corporation's Transport Strategy requires that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

## **9.8 Policy DE7: Daylight and sunlight**

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for



its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.

2. Development proposals should have regard to the daylight and sunlight levels of historic interiors and should seek opportunities to improve daylight and sunlight levels where this would be achievable and appropriate.
  3. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.
  4. Development should incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and public realm.
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### **Reason for the policy**

- 9.8.0 The City is an urban centre with a very high density of buildings, resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents. Daylight and sunlight can enhance historic interiors, particularly those that have a cultural or community function including religious buildings.

### **How the policy works**

- 9.8.1 The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Given the importance of the City's open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. Developers will be required to submit daylight and sunlight assessments and undertake radiance studies in support of their proposals. The City Corporation may require independent verification of these assessments at the developer's expense.
- 9.8.2 When considering proposed changes to existing lighting levels, the City Corporation will take account of the retained levels of daylight and the cumulative effect of development proposals, and existing levels of light if they are low. The City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site as well as the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. The City Corporation will publish further guidance for City developers on how it expects BRE guidance to be used and interpreted, including guidance on the use of methodologies such as radiance

studies to enable better understanding of daylight and sunlight impacts to a range of existing land uses.

- 9.8.3 Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered beneficial in the public interest and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

## **9.9 Policy DE8: Lighting**

1. Development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, relevant open spaces and community uses. The design of lighting should be informed by the potential impacts on biodiversity, and should seek to make the City a safer and more welcoming place to be for all its communities after dark.
  2. The external lighting of buildings should contribute positively to the unique character and – where relevant – grandeur of the City townscape by night.
  3. External lighting of heritage assets within the City must be sympathetic to the building and the wider context in terms of tone and brightness.
  4. Applications for major development and for lighting schemes should follow the submission requirements set out in the Lighting SPD (Lighting Strategy, Lighting Concept and Technical Lighting Design). All other applications should address how lighting has been considered as part of the submission.
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### **Reason for the policy**

- 9.9.0 The City Corporation aims to improve the night-time offering and create an after-dark street experience that befits a world class business and cultural centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.
- 9.9.1 Development has the potential to positively or adversely affect the level and quality of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as on biodiversity, movement, accessibility, safety, security as well as the reduction of energy use and light pollution.
- 9.9.2 Sensitively designed lighting schemes can improve accessibility for disabled people by reducing glare and excessive contrast. Well-designed lighting can support the prevention and detection of crime and anti-social behaviour and

improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light pollution, which can impact residential amenity, undermine biodiversity and cause harm to wildlife. Impacts on the City's open spaces – including the riverfront – are important considerations.

### **How the policy works**

- 9.9.3 The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it enhances the overall experience of this unique area, and provides orientation and wayfinding after dark.
- 9.9.4 The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting of historic buildings and limit adverse effects upon adjacent areas, uses and biodiversity.
- 9.9.5 The design of lighting schemes should be considered at an early stage in the development design process, having regard to the City of London Lighting SPD. For major applications and lighting schemes, developers should submit a Lighting Strategy at pre-application stage, a Lighting Concept with their planning application, and Technical Lighting Design details through condition if the application is approved. All other applications should consider the lighting impacts as part of the application.
- 9.9.6 Owners, occupiers and managers of existing buildings will be encouraged to adopt the principles set out in the Lighting SPD by signing up to the 'Considerate Lighting Charter' in the SPD.

# 10. Transport

## 10.1 Strategic Policy S9: Transport and Servicing

The City's transport infrastructure will be maintained and improved by:

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused.
  2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill and Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
  3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations, Docklands Light Railway (DLR) stations and river piers.
  4. Minimising road danger and congestion, and reducing vehicle emissions by:
    - Not providing any additional on-street car and motorcycle parking;
    - Identifying opportunities to use on-street parking reductions and restrictions to discourage private vehicle use;
    - Designing and managing streets in accordance with the City of London street hierarchy;
    - Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle;
    - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
    - Requiring the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
    - Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
    - Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, promoting best practice such as direct vision standards, and zero vision policies to minimise danger of travel and servicing, including through the use of river transport.
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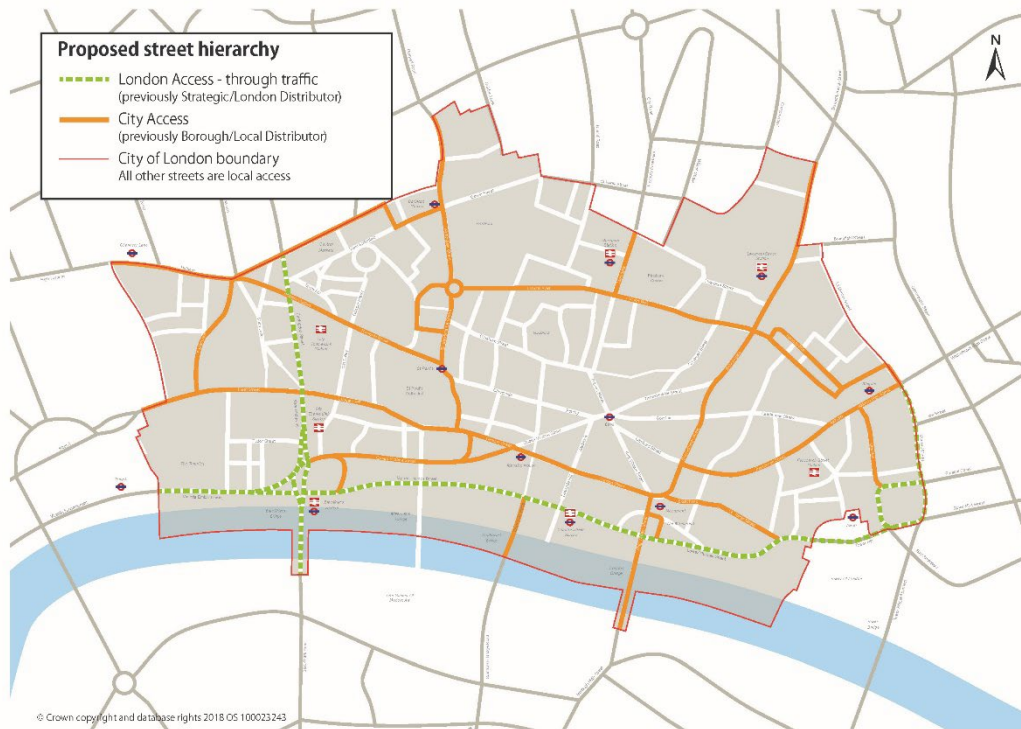
## Reason for the policy

- 10.1.0 The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. People walking and cycling make up more than two-thirds of all observed travel activity in the City. A third of all travel movements take place in the four peak hours: 8am to 10am and 5pm to 7pm. Over 90% of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The City is already a highly sustainable location, and the opening of the Elizabeth Line has resulted in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London to help secure improvements to public transport, for instance by safeguarding land from other forms of development where necessary.
- 10.1.1 The City's Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places.

<b>Movement function</b>	<b>Proposed category</b>
Through traffic – the preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.	London Access streets (TfL network)
Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access streets
Access – used for the first or final part of a journey, providing access to properties.	Local Access streets

**Table 1: City of London street hierarchy**

- 10.1.2 The TfL network (classified as London Access) is expected to accommodate the majority of through traffic, while roads which are managed by the City Corporation are classified as either City Access or Local Access. Changes to the highway network at Bank Junction and the changes to the St Paul's Gyratory are reflected in the street hierarchy.



**Figure 7: Proposed Street Hierarchy**

### How the policy works

- 10.1.3 The City's Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City's streets, with targets proposed to reduce the number of motor vehicles in the City from the 2017 baseline by at least 25% by 2030 and at least 50% by 2044. In 2022, motor vehicle traffic has already seen a 26% reduction from 185,000 vehicles in 2017 to 137,000 vehicles. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.
- 10.1.4 Achievement of the targets is dependent on measures introduced by the Mayor of London and TfL, although the City Corporation will explore specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.
- 10.1.5 The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 10.1.6 The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.

10.1.7 The City Corporation will require developers and occupiers to minimise the impact of freight and servicing trips through measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.

10.1.8 Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City’s streets.

**10.2 Policy VT1: The impacts of development on transport**

1. Development proposals must have a positive impact on highway safety for all users in accordance with the Transport Strategy and Vision Zero ambition, and should not have adverse effects on the City’s transport networks.
2. Where development would result in adverse impacts on the transport network, these must be demonstrated at pre-application stage and mitigated through site/building design, public highway works and management of operational activities. Appropriate measures to adapt public highway to mitigate the impact of the development will be sought via planning contributions or by legal agreement. There should be no reduction in the quality or function of the public highway as a result of development, and improvements should be sought where feasible.
3. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
4. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) are required for all developments that exceed the following thresholds:

<b>Land Use</b>	<b>Thresholds</b>
Offices	1,000m2
Residential	10 units
Retail	1,000m2
Hotel	10 bed spaces
Health	1,000m2
Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m2

5. A Construction Logistics Plans is required for all major developments or refurbishments and for any developments that would have a significant impact on the transport network during construction.

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## **Reason for the policy**

- 10.2.0 Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.
- 10.2.1 Major developments can have a significant impact on the function of existing streets and spaces and any adverse impacts must be mitigated by highway works and public realm interventions that enhance the quality of the City's streets and public spaces.

## **How the policy works**

- 10.2.2 An assessment of the transport implications of development, during both construction and operation, should address the impacts on:
- Road danger;
  - Pedestrian environment, pedestrian and cyclist movement, infrastructure provision;
  - Public transport; and
  - The street network.
- 10.2.3 Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.
- 10.2.4 For major developments, developers must demonstrate at pre-application stage the impact of the proposed development on the streets and spaces including the increase in pedestrian, cycle and vehicular numbers. Any proposals that substantially affect the use and function of an existing street or public space will be required to mitigate the impact of their development through appropriate highways works and public realm enhancements.
- 10.2.5 For applications that meet the relevant thresholds, a robust transport assessment is required, and an initial highways design general arrangement plan (at 1:200 scale), should be submitted, highlighting the highways works that would form part of a Section 278 Agreement. As a minimum, the reconstruction/reinstatement of the streets adjacent to the planning application site should be incorporated within the proposals.
- 10.2.6 Proposals for works to the public highway should be developed in accordance with the Transport Strategy, City of London Public Realm Toolkit, the City of

London Street Accessibility Tool (COLSAT), the City's Healthy Streets Plans and other relevant guidance.

- 10.2.7 Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) should be used to demonstrate adherence to the City Corporation's Transport Strategy. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website.
- 10.2.8 A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs).

### **10.3 Policy VT2: Freight and Servicing**

1. Applicants should consult with the City Corporation on matters relating to servicing at an early design concept stage.
2. Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites.
3. Development should be designed to provide for on-site servicing bays within buildings, wherever practicable. On site servicing areas must be of a sufficient size and design to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Servicing areas must be equipped with electric vehicle fast charging points. The use of servicing lifts will be required where this approach would be beneficial for creating attractive and inclusive public realm.
4. Delivery to and servicing of development must take place outside peak pedestrian hours (i.e. no deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries residential areas must take place outside the hours of 11pm – 7am on all days of the week. Areas of high footfall or in proximity to sensitive land uses may be subject to further restrictions, especially areas near cultural and visitor attractions and transport hubs.
5. Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by

river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.

6. Provision should be made within servicing bays for shredding operations. On-street shredding will not be permitted.

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### Reason for the policy

- 10.3.0 The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.
- 10.3.1 Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of consolidation, will help to minimise the number of trips required to service a development during construction and operation, as does the use of preferred suppliers or nominated carriers to serve a multi-tenanted building.
- 10.3.2 Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's Transport Strategy aims to use the planning process to require consolidation for new developments, while encouraging existing buildings and BIDs to use consolidation. Last mile logistics hubs can facilitate more deliveries on foot, by cycle and by small electric vehicles.
- 10.3.3 Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles.
- 10.3.4 In order to decrease freight vehicles in the City, the Transport Strategy aims to encourage freight into the City with rail. The City will work with Network Rail to explore opportunities for inward freight into mainline rail stations and encourages developers to support this.

10.3.5 On-street shredding operations associated with building occupation creates noise and congestion and can have an adverse impact on the amenity of neighbouring uses.

### **How the policy works**

10.3.6 Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom should be provided of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas.

10.3.7 Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development, a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. DSPs should set out the following (as appropriate):

- The number of vehicle trips that have been avoided as a result of the use of consolidation of servicing and deliveries
- Procurement measures (including those taken jointly with other businesses) that would reduce the numbers of delivery and servicing trips
- A commitment to the use of zero emission vehicles and how their use and the use of deliveries on foot and by cycle will be facilitated
- Appropriate routing for vehicles, including to and from consolidation centres, taking account of the City's street hierarchy and addressing the potential for river and rail freight
- Proposals for monitoring delivery and servicing arrangements, including consolidation.

10.3.8 Out of hours servicing is required, except in residential areas where night-time deliveries must be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing.

10.3.9 Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP. Where appropriate, construction deliveries may be accepted outside of normal working hours and the management of such deliveries should be explained in the DSP.

10.3.10 Further information is set out in the City of London's Freight and Servicing SPD.

## **10.4 Policy VT3: Vehicle Parking**

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised for alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported if it is demonstrated that they are no longer needed for a transport-related function.
4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as near stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

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### **Reason for the policy**

10.4.0 The City has excellent public transport accessibility and all development should therefore be car-free (except for designated Blue Badge spaces) unless it can be demonstrated that there are exceptional circumstances which justify limited car parking, in line with London Plan standards.

### **How the policy works**

10.4.1 Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. Any such parking should be marked out as such and restricted only for these users.

## **10.5 Policy VT4: River Transport**

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore;

2. Improvements to piers and other river-based transport infrastructure to enable an increase in passenger and freight transport by river will be supported, alongside opportunities for new river-based transport.
  - ~~3.~~ The City Corporation will seek the reinstatement of Swan Lane Pier for river transport uses. Development that prejudices this reinstatement will not be permitted.
  4. The permanent mooring of vessels along the riverfront will be resisted in order to maintain views of the river and heritage assets, allow public enjoyment of the riverfront and minimise potential impacts on archaeology, ecology, and amenity.
  5. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site, support improvements to Walbrook Wharf that would improve its operation, and seek opportunities for the use of the wharf for transfer of goods, where this would not undermine its safeguarded role.
  6. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.
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### **Reason for the policy**

- 10.5.0 Walbrook Wharf is the only active river wharf in the City and needs to be retained as a waste facility and river wharf in line with the associated Ministerial Safeguarding Direction and the London Plan. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site and improve its operation, there may be potential to use Walbrook Wharf for freight logistics.
- 10.5.1 Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.
- 10.5.2 Swan Lane Pier is a redundant pier and the City Corporation will seek its reinstatement for river transport uses. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.
- 10.5.3 Given the limited opportunities to improve river transport within the City, as well as the potential impacts on views, heritage, ecology, biodiversity, archaeology, noise and other disturbance, and public enjoyment of the riverfront, permanent mooring of vessels will be resisted.

## 10.6 Policy VT5: Aviation Landing Facilities

Heliports will not be permitted in the City. Individual helipads will only be permitted where they are essential for emergency or security purposes.

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### Reason for the policy

- 10.6.0 Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area.
- 10.6.1 In order to demonstrate a need for individual helipad facilities, the helipad must be certified by the emergency services and it must be shown that the need cannot be met elsewhere.
- 10.6.2 The City Corporation's Transport Strategy sets out principles that will apply to the potential use of drones in the City. The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.



## 10.7 Strategic Policy S10: Active Travel and Healthy Streets

The City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces in ways that enhance inclusion and accessibility, put the needs of people walking and wheeling first when designing and managing our streets, and enable more people to choose to cycle in the City by:

1. Applying the Healthy Streets Approach in development proposals and improvements to public realm;
  2. Improving conditions for safe, convenient, comfortable, inclusive and accessible walking, wheeling and cycling, incorporating climate change adaptation;
  3. Expanding the cycle network across the City with the aim of ensuring that all property entrances are within 250m of the network;
  4. Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;
  5. Improving access routes and the public realm around stations, and between stations and key destinations; and
  6. Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of disabled people.
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### Reason for the policy

10.7.0 The Healthy Streets Approach provides the framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.

10.7.1 Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, with over 750,000 walked and wheeled journeys a day. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost four-fold between 1999 and 2022, although the rate of growth has slowed since 2012. Pedestrian numbers have also risen in the past 10 years as the City's workforce has grown.

10.7.2 Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. The City has embedded the Healthy Streets Approach to inform strategic decision making and project prioritisation. Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles. New planning applications and public realm proposals will be assessed using the Healthy Streets Indicators to understand development impacts on surrounding streets and on people's experiences of the City's streets.

10.7.3 The Mayor’s Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking, wheeling and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk, wheel and cycle.

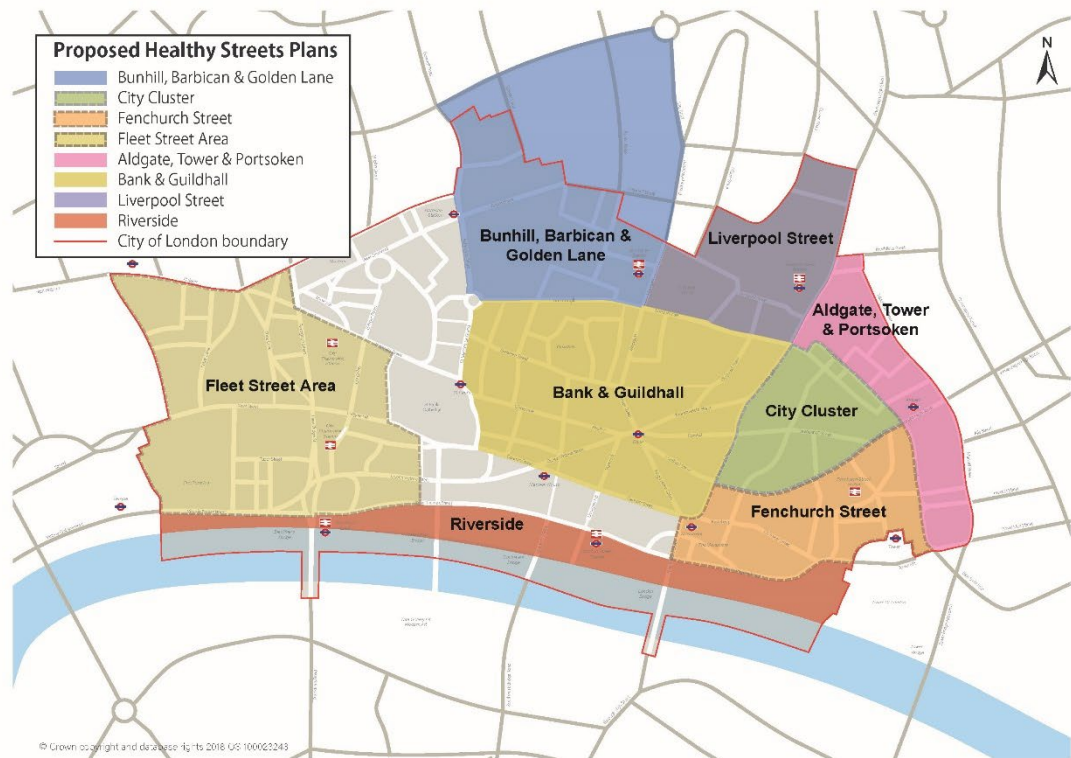


**Figure 8: Mayor’s Transport Strategy Healthy Street Indicators**

**How the policy works**

10.7.4 Through the City Corporation’s Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining appropriate levels of vehicular access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling, wheeling and walking, enhance the public realm and create new public space. Healthy Streets Plans will be developed by the City Corporation to cover the following areas: City Cluster;

Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.



**Figure 9: Proposed Healthy Street Plans**

## 10.8 Policy AT1: Pedestrian Movement, Permeability and Wayfinding

1. Developers should facilitate pedestrian movement, enhance permeability, and reduce severance by provision of suitable routes through and around new developments, wherever feasible. Development will be required to contribute towards the improvement of pedestrian permeability in the City by providing:
  - legible, good quality, safe and low pollution pedestrian connections between spaces;
  - new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;
  - publicly accessible ground floors for improved pedestrian movement, where feasible;
  - pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.
2. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around

the Barbican and London Wall. Development should not lead to the loss of routes and spaces that enhance the City's heritage, function or character.

3. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths aligned with TfL Pedestrian Comfort guidance to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians.
  4. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
    5. The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
    6. The shortest practicable routes between relevant points.
    7. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
    8. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable.
    9. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that it is clear to the public that access is allowed (without reliance on signage).
  10. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.
  11. Improved wayfinding will be sought through new development and public realm improvements. Improvements sought will include:
    - a. Opportunities to update, enhance and add to the network of Legible London signs;
    - b. Consistent signage for public spaces created in new development; and
  12. Better revealing 'hidden' routes, courts, alleys and other spaces in ways that respect and celebrate their character and heritage.
  13. Major development proposals should model the pedestrian flow impact of new development.
-

## Reason for this policy

- 10.8.0 In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes.
- 10.8.1 The City Corporation's Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, increasing the number of pedestrianised or pedestrian priority streets from 25km to 35km by 2030 and 55km by 2044. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 10.8.2 The Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 10):

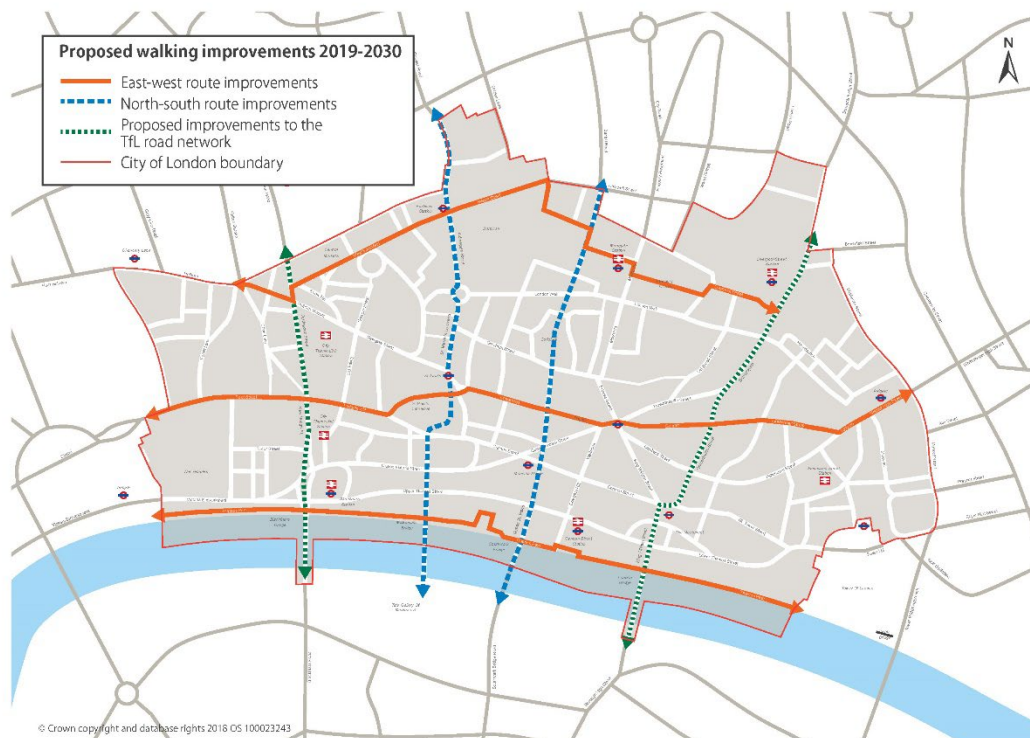
### Routes north-south from:

- Millennium Bridge to Barbican via St Pauls Cathedral, which supports the new Museum of London and Smithfield area changes.
- Southwark Bridge to Barbican via Guildhall
- Cannon Street to Liverpool Street via Bank
- Blackfriars Bridge to Farringdon via Ludgate Circus (in partnership with TfL)
- London Bridge to Liverpool Street via Bishopsgate including Monument junction (in partnership with TfL)

### Routes east-west from:

- Farringdon to Aldgate via Smithfield and the Barbican
- Fleet Street to Aldgate via Bank and the City Cluster, including Ludgate Circus (in partnership with TfL)
- Temple to Tower Hill via the Thames Riverside

- 10.8.3 The City's narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, wayfinding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City's users.



**Figure 10: Proposed walking improvements (2019-2030)**

### How the policy works

- 10.8.4 In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.
- 10.8.5 Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. Minimum pavement widths should accord to TfL's Pedestrian Comfort Guidance. TfL's Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City Corporation's Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.
- 10.8.6 Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition. Financial

contributions secured through s106 planning obligations will be used to ensure development contributes to improvements in the wider public realm. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

## 10.9 Policy AT2: Active Travel including Cycling

All major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle by:

- ensuring suitable access between the development site and pedestrian and cycle routes;
- incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards.

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### Reason for this policy

- 10.9.0 Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.
- 10.9.1 A growing number of people are choosing to cycle through and around the Square Mile. The popularity of cycle hire schemes has grown post-pandemic. Increased access to the East-West and North-South Cycleways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 11). TFL cycleways and will be prioritised on this network, with the aim of delivering the core cycling network by 2035.
- 10.9.2 Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans. Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London's Transport Strategy, and that of the Mayor of London.





**Figure 11: Proposed cycling network**

## How the policy works

- 10.9.3 New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces. The City of London's Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this. Accessible facilities for disabled cyclists should also be provided.
- 10.9.4 Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City's cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

## 10.10 Policy AT3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
  2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
  3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.
  4. Cycling facilities should be conveniently located, easily accessible, safe and secure.
  5. Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm.
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### Reason for this policy

10.10.0 There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, reduce carbon emissions and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

### How the policy works

- 10.10.1 Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. 5% of cycle parking spaces must be flexible in order to support secure storage and charging for e-bicycles, micromobility devices, and mobility scooters. A robust justification for failure to comply with London Plan standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.
- 10.10.2 Short-stay visitor cycle parking should be provided on-site at ground floor level. Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible.
- 10.10.3 In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.

10.10.4 The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.

10.10.5 This policy applies to the cycle parking provided within new developments. The City Corporation's Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. The Transport Strategy aims to ensure that operators of dockless cycle and scooter hire schemes require users to leave cycles and scooters in designated parking locations.

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# 11. Heritage and Tall buildings

## 11.1 Strategic Policy S11: Historic Environment

The City's historic environment will be protected, celebrated and positively managed by:

1. Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets;
2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness;
3. Seeking wider social, cultural, economic and environmental benefits by:
  - a) placing heritage at the heart of placemaking and delivering high quality buildings and spaces which enrich and enhance the settings of heritage assets;
  - (b) encouraging the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement, including those on Historic England's Heritage at Risk Register;
  - (c) encouraging heritage-led regeneration by identifying opportunities to draw on the contribution made by the historic environment to the character and identity of the place;
  - (d) encouraging sensitive sustainable retrofit of designated as well as non-designated heritage assets and improvements that would benefit climate resilience and adaptation;
  - (e) encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address;
  - (e) Seeking enhanced public access and interpretation of the City's cultural and heritage assets, ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse audience in a way that is socially and economically inclusive;

4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations; and
  5. Preserving and seeking to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its setting.
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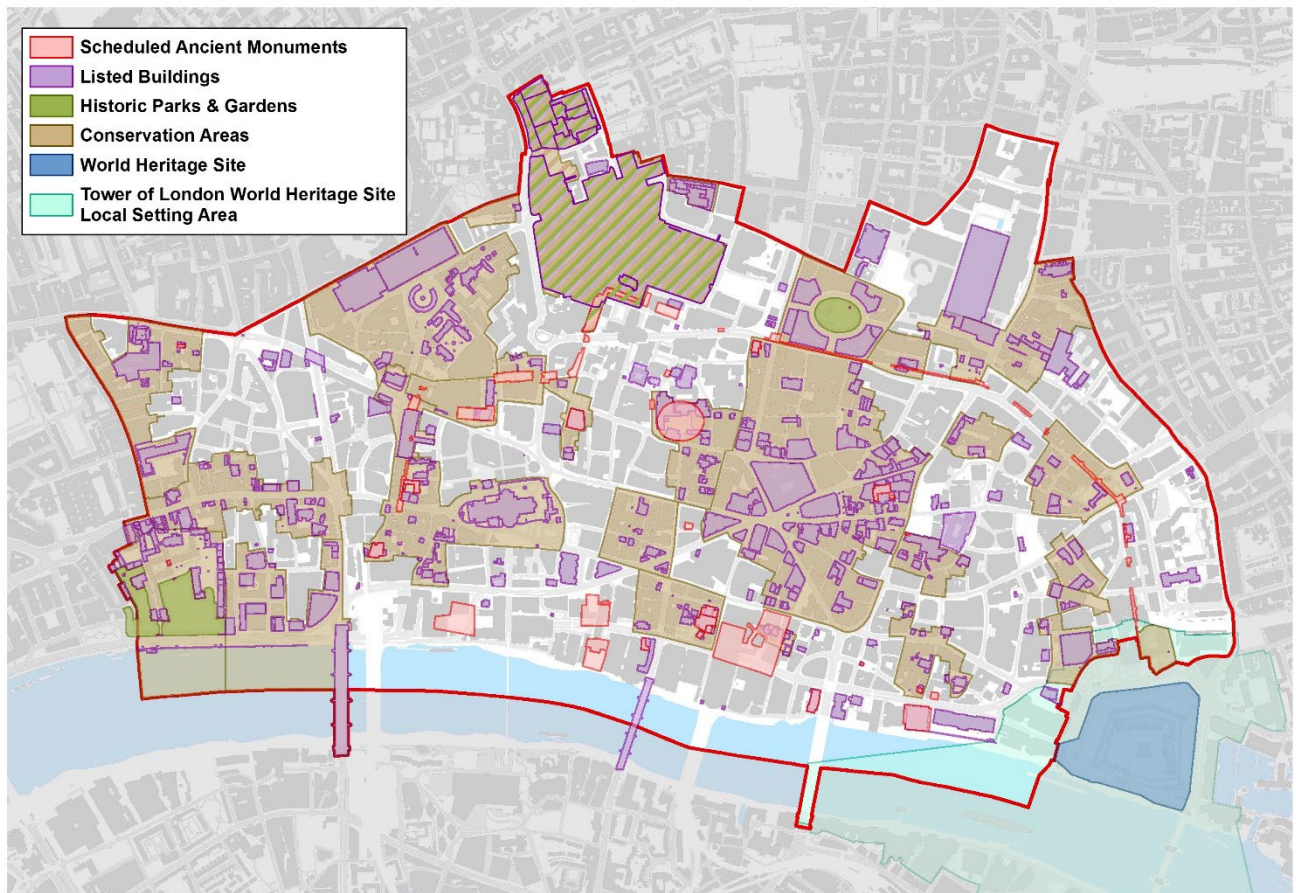
### **Reason for the policy**

- 11.1.0 The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.
- 11.1.1 There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17<sup>th</sup> century home on Cloth Fair, the unique early 18<sup>th</sup> century Bevis Marks Synagogue, and Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 scheduled monuments and five historic parks and gardens. Furthermore, the City provides part of the backdrop and setting for the Tower of London World Heritage Site.
- 11.1.2 The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.
- 11.1.3 The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.
- 11.1.4 The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of the City's listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space.
- 11.1.5 Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as creative industries, and providing potential space for hotels and retail uses. In order to build upon the wider social, cultural and economic benefits of the

historic environment, public access to, and experience of, the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

- 11.1.6 The re-use, refurbishment and retrofitting of the City's historic building stock is important for mitigating climate change impacts and reducing carbon emissions. Heritage assets must adapt to meet changing needs and environments while preserving their heritage significance. The City Corporation will require development proposals to find sensitive retrofitting solutions to reduce carbon emissions; enhance climate resilience; and improve access and environmental performance of historic buildings. Retrofitting historic buildings will be supported where a sensitive and tailored approach to design and specification is taken, in line with the City Corporation's Heritage Buildings Retrofit Toolkit.

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**Figure 12: Designated heritage assets in the City of London**

## How the policy works

11.1.7 Applicants will be required to undertake a comprehensive heritage assessment proportionate to the scale of their site and heritage asset to understand ways in which their proposal could contribute towards the enhancement and enjoyment of the historic environment. This should include considering innovative approaches that extend beyond conventional conservation practices to promote wider social, cultural and environmental benefits associated with heritage conservation.

## 11.2 Policy HE1: Managing Change to the Historic Environment

Development proposals that affect heritage assets or their settings should be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. It should be ensured any impacts of the proposals on the significance of heritage assets or their settings have been fully assessed and understood. The



level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Proposals should meet the following criteria:

1. Development should preserve and where possible enhance and better reveal the special architectural or historic interest and the significance of heritage assets and their settings;
2. There will be a presumption against heritage harm and development causing harm to, or total loss of, the significance of designated heritage assets will be refused unless it is clearly demonstrated that the heritage and/or wider public benefits outweigh that harm or loss. Applicants should clearly demonstrate that all reasonable efforts have been made to sustain the existing use, find new appropriate uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset;
3. Change of use to heritage assets should be consistent with their long-term conservation and should help to retain and enhance the asset, particularly those which have been identified at risk;
4. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought.
5. Where proposals would result in harm to, or the loss of, a non-designated heritage asset, the City Corporation will have regard to the scale of any harm or loss, the significance of the heritage asset and the wider public benefits proposed.
6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered;
7. Development should preserve, and where possible, enhance and better reveal the significance, character and appearance of the City's registered historic parks, gardens and open spaces and should protect their settings and views from and towards these spaces;
8. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets;

9. Development should encourage the appreciation of the City's historic roofscapes and should not impact the setting of an asset from high-level locations.
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### **Reason for the policy**

- 11.2.0 The City of London's historic environment is of one its greatest assets. The special character that the City derives in large part is from the concentration and significance of its heritage assets, many of which are nationally and internationally renowned. Given their immense contribution to the character, economy and quality of life of the City, it is important that change to the historic environment is sensitively and carefully managed in ways appropriate to its significance and that makes it an integral part of the surrounding context.
- 11.2.1 The City Corporation has identified 'immediate setting' areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance.

### **How the policy works**

- 11.2.2 Applicants should provide a clear and comprehensive understanding of the heritage significance of a building including any contribution made by their setting. The level of detail should be proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.
- 11.2.3 National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial, it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 11.2.4 Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear

understanding of the building, structure, open space or archaeological remains, including group value.

- 11.2.5 The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting. Applicants should consider the significance and special character of conservation areas, informed by the Character Summary and Management Strategy Supplementary Planning Documents.
- 11.2.6 In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 11.2.7 Many buildings in conservation areas, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.
- 11.2.8 Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.
- 11.2.9 Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building does not harm its significance. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.
- 11.2.10 The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have been lost to the detriment of the City's historic townscape. Where possible, the City Corporation will seek to re-open or reintroduce such routes when the opportunity arises.
- 11.2.11 In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings.

This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.

11.2.12 Applicants will be required to provide supporting information describing the significance of any heritage assets where fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets. Applicants should refer to guidance by Historic England, Good Practice Advice Note in Planning 3: The Setting of Heritage Assets.

11.2.13 The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these heritage assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in these areas, highlighting the key aspects that contribute to their significance. Applicants should draw reference to the Character Areas Study to understand their site's significance and the key attributes of significance that they should consider.

### **11.3 Policy HE2: Ancient Monuments and Archaeology**

1. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, inclusive access to, public display and interpretation where appropriate.
  2. Development proposals which involve excavation or works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.
  3. Significant, substantive archaeological features on major development sites must be preserved in-situ and, where feasible, exposed to public view. Significant archaeological artefacts on major development sites must be retained and exhibited on site. Where it can be demonstrated that found archaeological features or artefacts are of lesser significance or substance, proper investigation and recording of archaeological remains will be required as an integral part of a development programme, including timely publication and archiving of results to advance understanding.
-

## **Reason for the policy**

- 11.3.0 The archaeological potential of the City is of national and international significance and continues to shed new light on the Roman world in Britain, as well as considerable detail of life in later periods. Although there has been considerable redevelopment and excavation within the City, there remains much potential for the City's archaeology to reveal information about and deep understanding of period in its history spanning two thousand years. Some of the archaeology is still visible – such as the remains of the Roman and medieval City wall exposed above ground or revealed in development sites, or the remains of the Amphitheatre below the Guildhall.
- 11.3.1 The City's rich archaeological heritage has a major role to play in the Destination City programme and a strong contribution to make to the City's cultural offer. Accordingly, the City will, whilst adhering to the highest standards of scholarly research, investigation and recording, proactively seek opportunities to reveal and celebrate this archaeological heritage.

## **How the policy works**

- 11.3.2 The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.
- 11.3.3 Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and to inform consideration of the development proposals by the City Corporation.
- 11.3.4 In some cases, a development may reveal archaeological features or artefacts which could either be displayed on the site, or reburied. Their treatment would depend on their level of significance and their substantiveness.
- 11.3.5 Undesignated archaeological features equivalent in significance and substance to a scheduled ancient monument will be treated accordingly following consultation with Historic England.
- 11.3.6 On sites where significant, substantial archaeological features exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future.

- 11.3.7 The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of development proposals and agreement will be sought, where appropriate, to achieve public access. Successful exemplars of this are the Roman Wall exhibition at Vine Street, the Roman amphitheatre in the Guildhall Art Gallery or the Temple of Mithras at Bloomberg.
- 11.3.8 On sites where significant archaeological artefacts are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public. This would be undertaken following the conclusion of any programme of research and study.
- 11.3.9 Development proposals should provide an adequate assessment of a site and make any provision for the incorporation, safeguarding or preservation of significant features or remains, or which would harm or adversely affect those features or remains. Where display features or of archaeological remains would harm the heritage asset or make it vulnerable and reburial is necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.
- 11.3.10 A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be conditioned and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

#### **11.4 Policy HE3: Setting of the Tower of London World Heritage Site**

1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site. Applicants will be required to submit a Heritage Impact Assessment along with the planning application.
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and connectivity.
3. Development proposals in the vicinity of the Tower of London World Heritage Site will be encouraged to enhance pedestrian and cycle routes, including signage and wayfinding in the area that is appropriate and contributes to the importance of setting of the Tower by improving its public accessibility and visibility.

## **Reason for the policy**

11.4.0 The Tower of London is a UNESCO World Heritage Site of Outstanding Universal Value. While the Tower itself is within the London Borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to safety and accessibility for people walking and cycling.

## **How the policy works**

- 11.4.1 Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.
- 11.4.2 The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its OUV, while accommodating change. The International Council on Monuments and Sites (ICOMOS) publication 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' offers guidance on the process of commissioning Heritage Impact Assessments (HIAs) for World Heritage properties and also outlines the methodology to be used to evaluate the impact of potential development on the OUV of properties.
- 11.4.3 The Character Areas Study contains a Statement of Heritage Significance for the Tower of London outlining the key attributes that contribute to the OUV of the Tower of London and its setting which should be protected, enhanced or better revealed. Applicants should refer to the Statement of Heritage Significance to fully understand the significance of the Tower of London and its setting.
- 11.4.4 The City Corporation is also undertaking a Heritage Impact Assessment to assess the potential impacts of the tall building areas on the OUV of the Tower of London WHS.



## 11.5 Strategic Policy S12: Tall Buildings

### Definition

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD).

### Location and heights

2. The tall building areas identified on the Policies Map and Figure 14 are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies.
3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.
4. The height and form of tall buildings must take account of strategic and local views.
5. The suitability of sites for tall buildings within the identified areas and their design, height, scale and massing should take into consideration local heritage assets and other localised factors relating to townscape character and microclimate.
6. Applicants will be required to submit accurate three-dimensional computer models to support the analysis of their proposals. Accurate Visual Representations (AVRs) should be submitted as part of the application.
7. Applicants will be required to ensure that any cross-boundary impacts of proposed schemes are fully addressed.

### Impacts

8. Tall buildings must have regard to:
  - the potential effect on the City skyline, the wider London skyline and historic skyline features;
  - the character and amenity of their surroundings, including the relationship with existing and consented tall buildings;
  - the significance of heritage assets and their immediate and wider settings;
  - the environmental impact on the surrounding buildings and public realm, including daylight and sunlight, solar glare, solar convergence, overshadowing and wind shear, and the capacity of the City's streets and

spaces to accommodate the development. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants;

- The potential impact on telecommunications operations. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible;

9. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.

### **Design and public access**

10. The design of tall buildings must:

- achieve exemplar standard of architectural quality and sustainable and accessible building design;
- enhance the City skyline and views;
- provide adequate levels of daylight and sunlight within the new development;
- make a positive contribution to the townscape character;
- make a positive contribution to the quality of public realm, incorporate active frontages at ground floor and create a positive pedestrian experience;
- maintain adequate distance between buildings to ensure high quality experience at the street level;
- enhance permeability by providing the maximum feasible amount of publicly accessible open space at street level;
- incorporate publicly accessible open space within the building and its curtilage, including free to enter, publicly accessible elevated spaces at upper levels, which may include culture, retail, leisure or education facilities, open spaces including roof gardens or public viewing galleries;
- provide consolidation of servicing and deliveries to reduce potential vehicle movements;
- mitigate adverse impacts on the microclimate and amenity of the site and surrounding area and avoid the creation of building canyons; and
- demonstrate consideration of public safety requirements as part of the overall design.

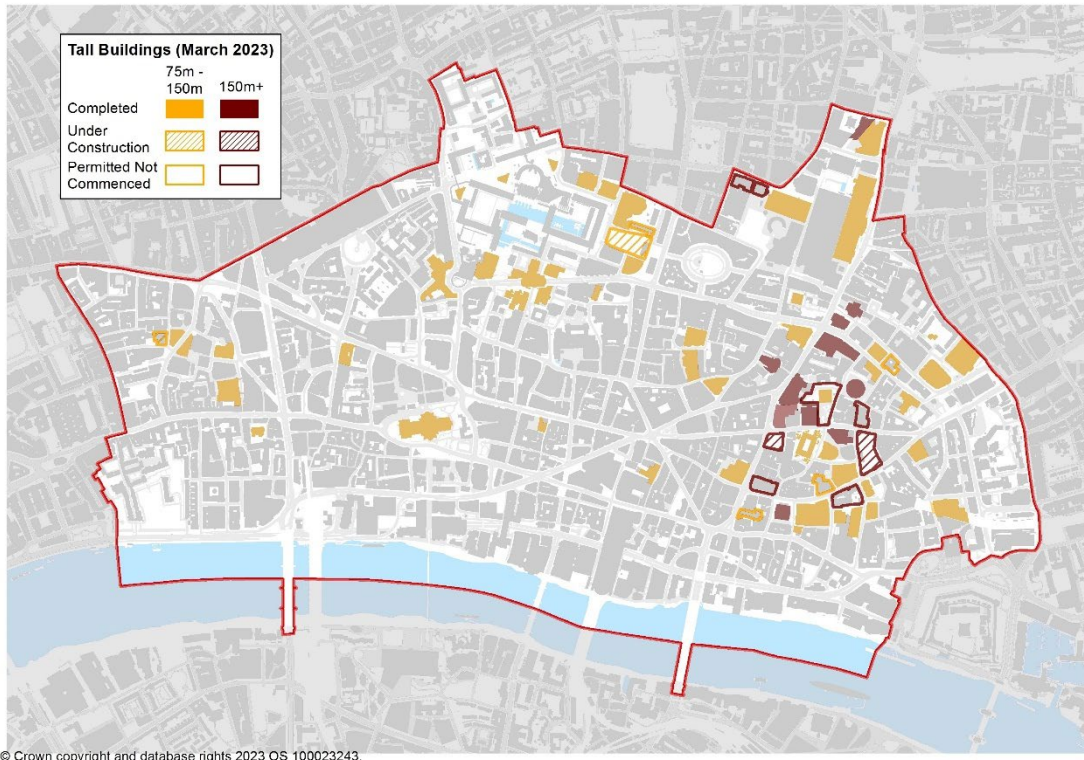
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### **Reason for the policy**

11.5.0 London Plan Policy D9 (Tall Buildings) requires Development Plans to define what is considered to be a tall building and determine if there are locations where tall buildings may be an appropriate form of development, identifying locations and appropriate tall building heights. Guidance issued by the Design Council/CABE and Historic England also encourages local planning authorities

to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate.

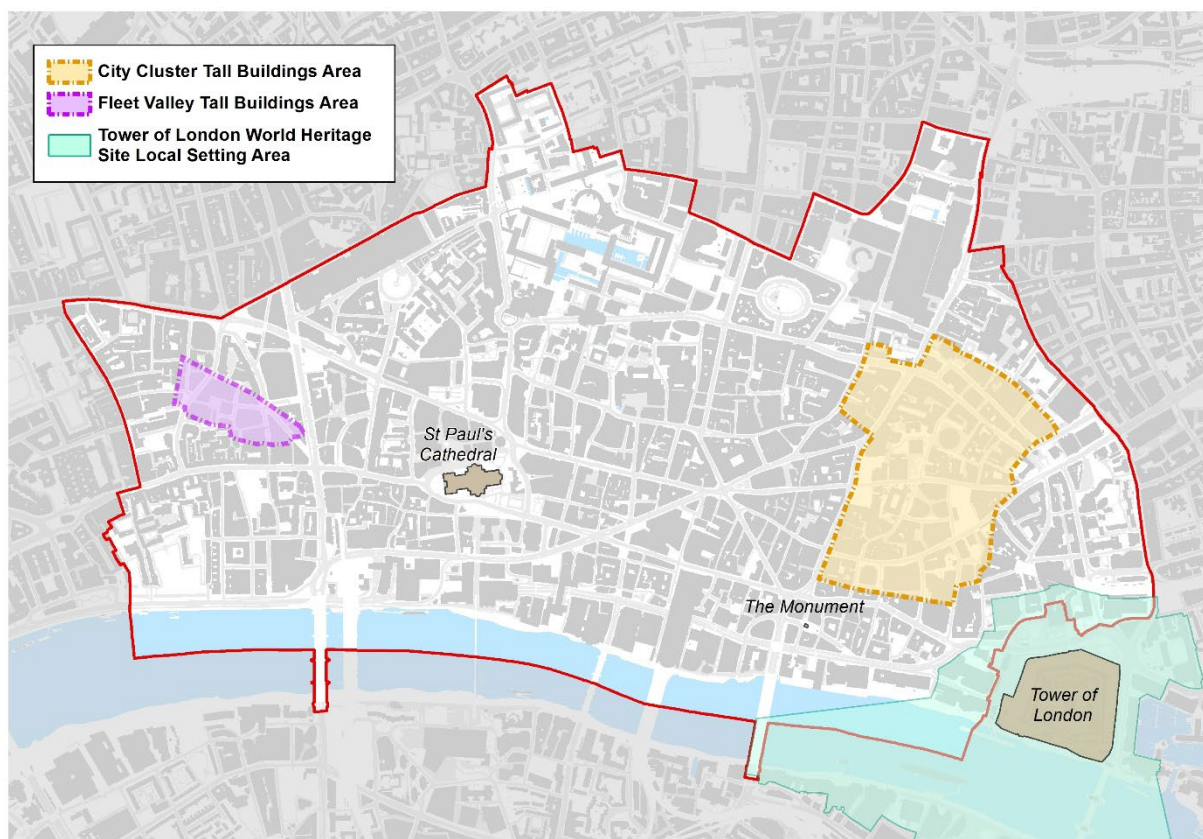
- 11.5.1 Tall buildings in the City are defined as those exceeding 75m AOD in height. The City Corporation's Ordnance Survey data on building heights indicates much of the City is between 50-75m above Ordnance Datum (AOD), or between 15-21 storeys; and only small pockets of the City have building heights at or around 6 storeys or 18m high. These areas include relatively small parts of Smithfield, Fleet Street and the Temples or along the lanes and alleys off Bank junction, which mostly comprise conservation areas. The City has a varied character with a striking spatial contrast. Given its small geographical area, it is not considered appropriate to prescribe a granular approach to a definition of tall buildings, but instead to have a single definition for tall buildings across the area. A definition of 75m ensures consistency with our longer-term strategic approach and – given prevailing heights across much of the City – is a level where buildings may have significant visual implications and could result in a significant change to the skyline.
- 11.5.2 The City contains many tall buildings. In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings impart the City of London's World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan.
- 11.5.3 Tall building development can have transformational impacts upon a place and they should be located in sustainable locations where they don't undermine the character of a place, or intrude into, and undermine cherished views of landmarks or urban skylines. They can also cause adverse environmental impacts such as reduction in daylight and sunlight, wind shear and overshadowing. It is therefore critical to determine appropriate areas and heights for tall buildings in order to respond to the opportunities that tall buildings may provide whilst also addressing and responding appropriately to the issues that they may create.



**Figure 13: Tall buildings distribution (March 2023)**

- 11.5.4 The tall building areas identified are the City Cluster and Fleet Valley areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, tall buildings would be likely to very significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.
- 11.5.5 Different parts of the City have different characteristic features that make them distinct from each other. New development should be designed to fit in well within the existing context and have form, massing and height that positively responds to the townscape character.
- 11.5.6 The heights of the buildings in the City Cluster and Fleet Valley areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.

- 11.5.7 Tall buildings are a characteristic and iconic feature of the City’s skyline. Well-designed tall buildings can respond positively to the character and the historic environment of the area. The creation of coherent clusters of tall buildings will help to ensure individual tall buildings are not isolated features but part of a recognisable skyline, with viewers able to identify the clusters spatially and distinguish them visually from important skyline features such as St Paul’s Cathedral.
- 11.5.8 The way tall buildings are experienced at ground level is an important consideration as tall buildings can have a significant impact on the streetscape and public realm. They can provide a range of activities and public spaces at ground level for people to walk and spend time. They can also benefit communities by providing publicly accessible viewing terraces and galleries.



**Figure 14: Areas appropriate for tall buildings**

### How the policy works

- 11.5.9 The identification of the two tall building areas does not mean that all sites in the two areas are suitable. All new tall building proposals will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan. Policy S21 provides more details about the considerations that apply specifically to new tall building proposals in the City Cluster.

- 11.5.10 Tall buildings are high-profile developments with a wider impact, visible on the skyline across large parts of London. They provide City landmarks and should be designed to enhance the City's skyline.
- 11.5.11 London Plan policy D9 B requires appropriate locations and appropriate tall building heights to be identified on maps in Development Plans. Figure 14 and Policies Maps C and D identify the areas where tall buildings may be appropriate in the Square Mile. Within these areas, Figure 15 and Policies Maps C and D identify contour rings. These contour rings set out the maximum tall building heights at specific points within the area. These maximum heights are those that the City Corporation considers to be the appropriate tall building heights based on an assessment of the potential impacts on strategic views and the following heritage assets: St Paul's Cathedral, The Monument and the Tower of London World Heritage Site. In areas between the contour rings, tall building heights should be designed to successfully mediate between them. Where two contour rings overlap, Policies Map C identifies two heights. The lower height should be applied to the development that sits outside the contour ring; the higher height should be applied to the development that sits inside the contour ring. In addition, part 8 of the policy requires the height and form of tall buildings to take into account strategic and local views; protected views are also addressed in Strategic Policy S13.
- 11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyscape.
- 11.5.13 Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings. The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on heritage assets, while recognising the juxtaposition of old and new architecture that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.
- 11.5.14 Tall buildings must not adversely impact on the operation of London's airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority's (CAA's) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA, Heathrow and London City Airports regarding building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.



11.5.15 The development of tall buildings must take account of City Corporation Planning Advice Notes and SPDs on the potential microclimate and thermal comfort impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar convergence, sunlight, wind and thermal comfort explaining how they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.

11.5.16 Three dimensional computer models should be accompanied by data to verify the format, units of measurement and accurate positioning information relative to OSGB / Ordnance Datum co-ordinates. Submitted Accurate Visual Representations (AVRs) should be consistent with the supplied computer model but may reflect additional information to explain the physical appearance of the proposals. They should comply with the methodology and definitions included in Appendix C of the London View Management Framework (LVMF). AVR materials should include representations of existing tall buildings and relevant consented schemes.

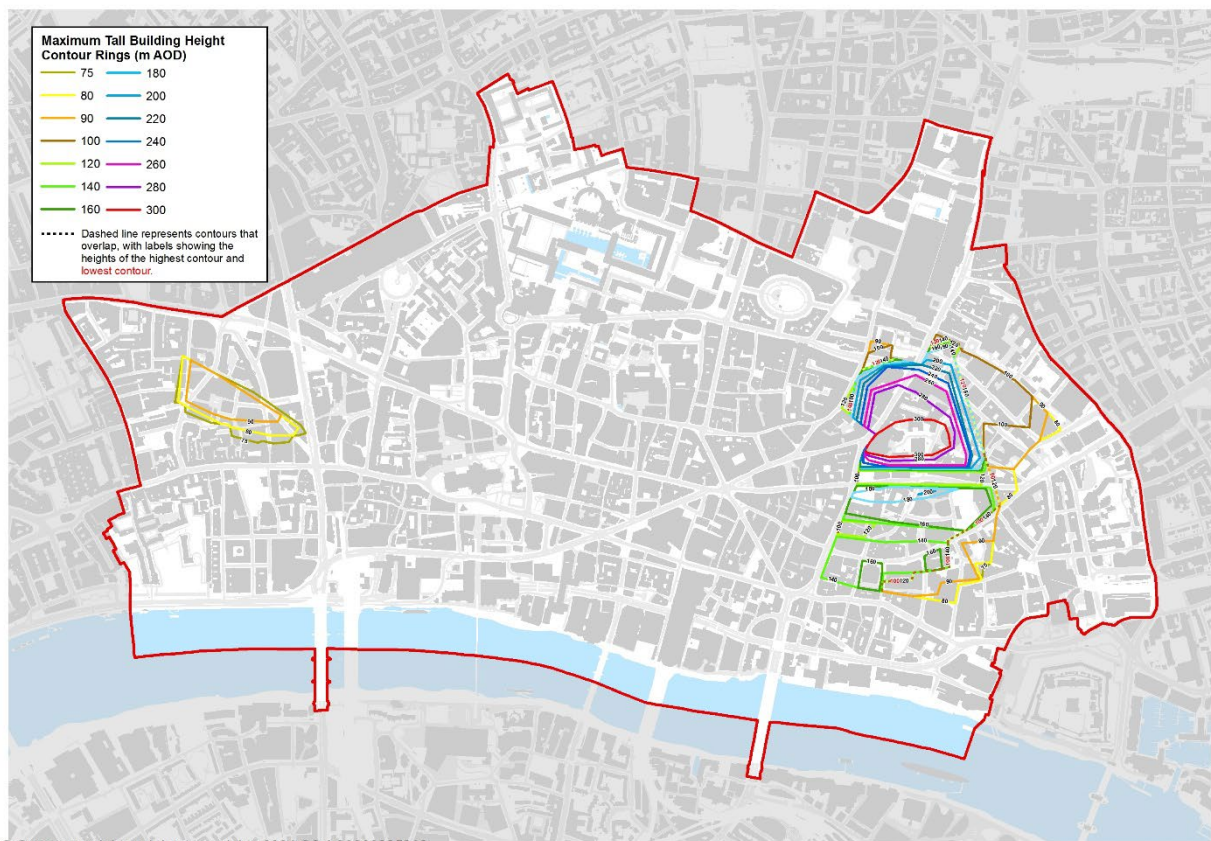


Figure 15: Tall building contours

## 11.6 Strategic Policy S13: Protected Views

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

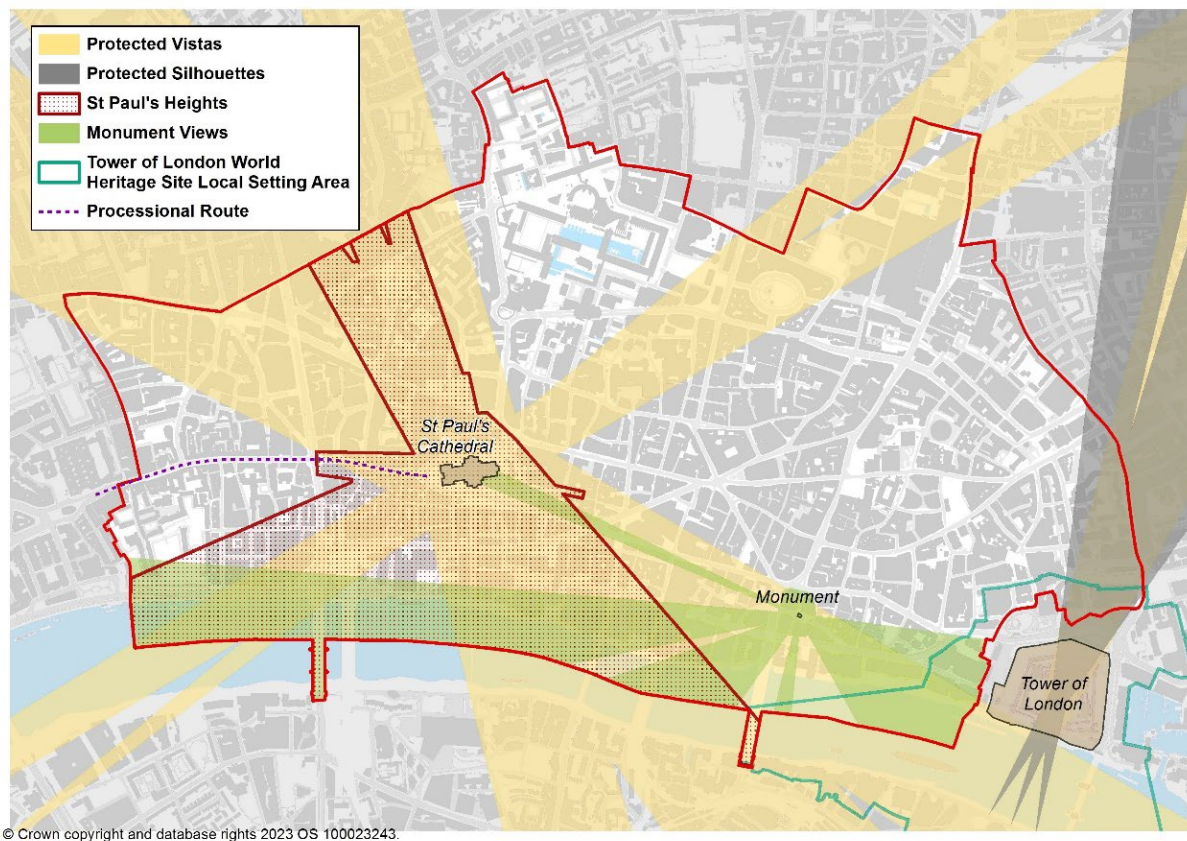
1. Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views;
2. Protecting and enhancing significant local views of St. Paul's Cathedral, through the City Corporation's St. Paul's Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features;
3. Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016); and
4. Having regard to views of the City that have been designated by other Local Planning Authorities.

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### Reason for the policy

- 11.6.0 The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The successful protection and restoration of the views depends on the long-term application of the Heights limitations to all sites within the area of control. The views protected by the Heights are sensitive to even small infringements. Consistent application of the limitations is therefore crucial to their successful protection of the views.
- 11.6.1 The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.
- 11.6.2 The approach to views protection in this Plan is supported by more detailed guidance in the Protected Views SPD.





**Figure 16: Protected views**

### How the policy works

- 11.6.3 Protected vistas are defined geometrically from an assessment point at the view location to the strategically important landmark that is the focus of the protected vista. Each protected vista includes a landmark viewing corridor, within which development should not exceed the height of the threshold plane. Beside and behind landmark viewing corridors are the wider setting consultation areas, within which development that exceeds the defined LVMF threshold plane should not compromise the viewer's ability to recognise and appreciate the strategically important landmark.
- 11.6.4 Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are river prospects from Thames bridges and the Riverside Walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.
- 11.6.5 The LVMF defines a protected vista and a White Tower protected silhouette for the Tower of London. Any development in the wider setting consultation area in

the background of this protected vista and the white tower protected silhouette should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, proposed new development in the City which exceeds the defined LVMF threshold plane for this view will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.

- 11.6.6 The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.

### **Operation of the Heights**

- 11.6.7 The City Corporation has successfully protected views of St. Paul's Cathedral through the St. Paul's Heights policy for over 70 years. Applicants will be expected to submit drawings showing the relationship between the Heights limitations and the proposed development to ensure compliance with the Heights.
- 11.6.8 Some existing buildings exceed the Heights limitations and thereby partially obstruct the protected views of St Paul's Cathedral. Upon alteration or redevelopment such buildings will be required to comply with the Heights limitations so that views obstructed at present will eventually be restored. Several infringing buildings have been redeveloped in compliance with the Heights, successfully restoring lost views.
- 11.6.9 Strict observance of the Heights limitations can sometimes lead to a uniform roofscape. Developers are encouraged to provide design solutions to help promote a more articulated, interesting roofscape within the area of the St. Paul's Heights limitations while also keeping to the limitations imposed by the St. Paul's Heights grid.

### **Backdrop and Skyline Setting of the Cathedral**

- 11.6.10 In some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or cluster close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings should aim

not to worsen and, where possible, to improve the backdrop to the views. From other Heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation.

- 11.6.11 In views from the south bank west of Blackfriars Bridge and from Waterloo Bridge the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and should be maintained.
- 11.6.12 The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street, Ludgate Circus and Ludgate Hill which forms part of the long established royal and state processional route between Westminster and the City. The views of St Paul's are kinetic, changing as the viewer moves along the length of this route, depending on the topography and alignment of buildings. Development proposals that could be visible from places along this route should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure 16 to highlight this issue.
- 11.6.13 New development proposals should be well designed in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE, Historic England and the Greater London Authority.
- 11.6.14 The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.
- 11.6.15 The City Corporation will supplement its assessment of strategic and locally protected views with a visual assessment carried out using 3D digital modelling technology. Developers should submit virtual models for all major development in an open source or other format compatible with the City Corporation's 3D digital model.

### **St Paul's Preservation Act and the St. Paul's Depths**

- 11.6.16 The City of London (St Paul's Cathedral Preservation) Act 1935 defines an area near St Paul's where development below prescribed depths is controlled in order to protect the stability of the Cathedral.

# 12. Open Spaces and Green Infrastructure

## 12.1 Strategic Policy S14: Open Spaces and Green Infrastructure

The City Corporation will work in partnership with developers, landowners, the churches and other agencies to promote a greener City by:

1. Protecting existing open and green space;
2. Seeking the provision of new open and green space through development, public realm or transportation improvements;
3. Increasing public access to existing and new open spaces;
4. Creating, maintaining and encouraging high quality green infrastructure;
5. Using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
6. Promoting the greening of the City through new development opportunities and refurbishments;
7. Ensuring new development and refurbishment protect and enhance the City's biodiversity; and
8. Ensuring that the provision of new and enhanced open space, biodiversity and urban greening takes account of and contributes toward the green corridors identified in Figure 18 and the City Corporation's Biodiversity Action Plan.

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### Reason for the policy

12.1.0 The City is densely built up and most of its open space provision consists of small spaces at street level. Open spaces are vital to the City, offering residents, workers and visitors outside spaces in which to spend time, relax, and encounter nature, and play a crucial role in providing opportunities for play, exercise and recreation, and social interaction. Open spaces are also inclusive, providing free access for everyone. They are important havens for wildlife and enrich the City's biodiversity, and help to mitigate the effects of climate change, improve air quality and benefit wellbeing, and physical and mental health. Green infrastructure in the City includes civic spaces, parks and gardens, trees and planting, churchyards, burial grounds, green roofs and walls in addition to amenity spaces.

12.1.1 The City's growing workforce and increasing visitor numbers, and the limited amount of open space in the Square Mile, mean that there is a need to provide more open spaces, and to improve and protect those that exist. Some areas of the City have deficiencies of open space or access to nature, or are places

(such as the riverside) where additional open space and greening has an important role to play in realising the potential of the area and helping to create a more vibrant and welcoming City.

- 12.1.2 Greening the City is an important step in ensuring the City is resilient to the effects of climate change. It can assist in creating cooler spaces, mitigating the urban heat island effect, and provide shade. Greening can improve biodiversity, improve air quality, and create a more attractive environment. Given the dense nature of the Square Mile and the demand for additional capacity, it is crucial that development provides greening and improves biodiversity on-site and contributes as appropriate to wider improvements to green infrastructure.

### **How the policy works**

12.1.3

## **12.2 Policy OS1: Protection and provision of open spaces**

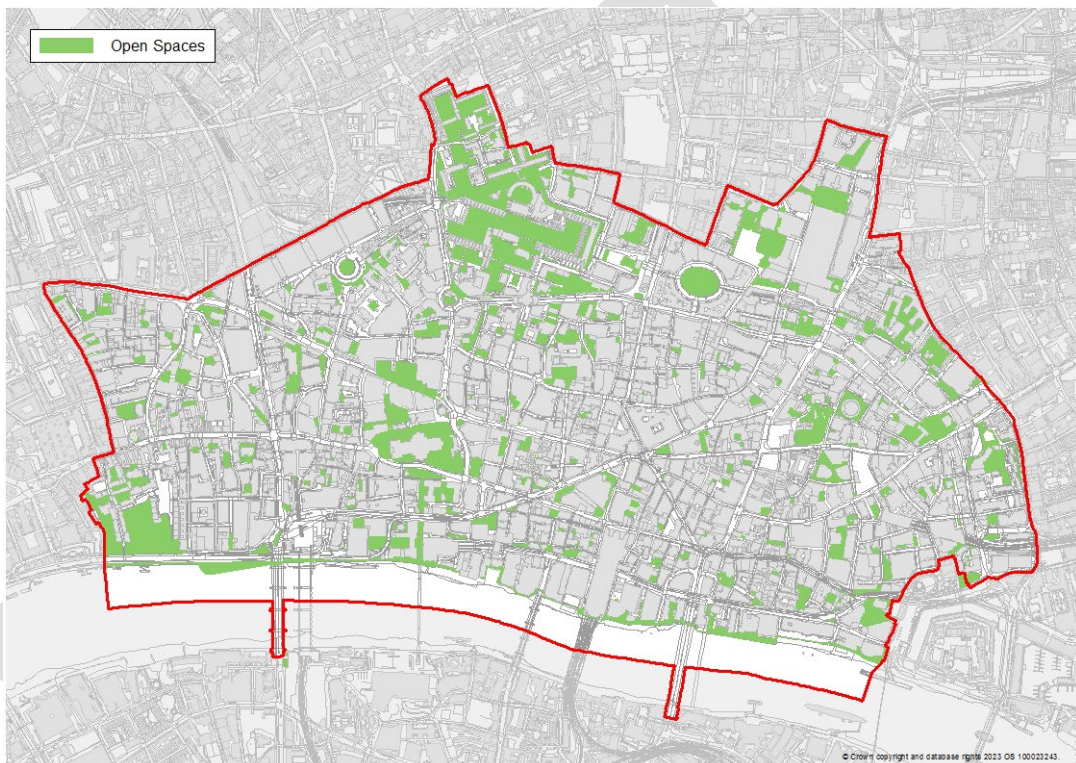
The quantity, quality and accessibility of public open space will be maintained and improved.

1. Existing open space will be protected and enhanced. Any loss of existing open space should be wholly exceptional and it must be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site. The loss of historic open spaces will be resisted;
2. Additional publicly accessible open space and pedestrian routes will be sought in major developments, particularly in and near to areas of open space deficiency, in areas such as the riverside where it is a key component of placemaking, and where pedestrian modelling shows significant pressure on City streets;
3. Further open spaces will be created from underused highways and on development sites where feasible. Wherever possible, existing private spaces will be secured as publicly accessible open spaces as part of development;
4. Improvements to the accessibility, inclusion, design, greening, lighting and biodiversity of existing open spaces will be promoted and, where relevant, secured through development; and
5. Open spaces must be designed to meet the requirements of all the City's communities. They should be free, accessible, welcoming and inclusive. The design of open spaces should consider their context and how their use could contribute positively to the life of the Square Mile. This should include consideration of how seating, planting, lighting, and routes are designed and located; the potential for water features and noise attenuation; and opportunities for play, sport, recreation and leisure, taking into account likely users of the space.
6. The provision of public drinking fountains in open spaces will be encouraged.



## Reason for the policy

12.2.0 The City of London has 376 open spaces totalling just under 35 hectares in March 2022, which includes parks, gardens, churchyards and hard open spaces such as plazas and repurposed highway. Most of the open spaces are small, with approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquillity, leisure and sport, and to increase biodiversity. The provision of open space in the City is uneven, with some areas of deficiency in access to public open space (Figure 17). Sites within and near to these areas will need to play a role in improving access to open space.



**Figure 17: Open Spaces**

12.2.1 As the City changes, there is a need for open spaces to play an increased role in supporting the life of the City. Open spaces provide a unique setting for people to spend time in free and accessible spaces, where they can pursue a variety of activities or simply enjoy being outdoors. Some parts of the City would benefit substantially from increased and improved open space provision. The Thames riverside has significant potential as an inclusive leisure destination but includes a Riverside Walk that is narrow in places and lacks significant open areas where people can spend time and enjoy the river. Areas where there are due to be significant new attractions – such as Smithfield – that are likely to attract visitors including children and young people will require open spaces that can cater to their specific requirements. Other places, such as the City Cluster, where there are deficiencies in open spaces and high density development, will

need to ensure that existing ground level open space works hard and is of an exemplary standard of design. New spaces at ground level should be created where possible, and supplemented through the addition of publicly accessible roof gardens and other spaces (see Policy DE5). Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area has a lower proportion of open space (see Figure 17).

## 12.3 Policy OS2: Urban Greening

1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.
  - All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context;
  - The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought, where appropriate, and new development should not compromise these elements on existing buildings located nearby; and
  - The loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances.
2. Major development proposals will be required to:
  - Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City's target UGF score of 0.3 as a minimum; and
  - Submit an operation and maintenance plan to demonstrate that the green features will be maintained and remain successful throughout the life of the building.

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### Reason for the policy

12.3.0 Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity enhancement, recreation, and health and wellbeing of the City's communities. Given the limited opportunities to provide additional large green spaces in the Square Mile, greening the urban realm will be important if these benefits are to be realised. Greening will increase in importance as weather patterns continue to change with rising average temperatures, summer droughts and more intense rainfall events periodically through the year. The inclusion of blue infrastructure such as rain gardens and rainwater harvesting can help to minimise water use.

12.3.1 This policy promotes greening for all new buildings and public realm schemes. It takes account of the value of different types of greening through the



application of an Urban Greening Factor (UGF), with a higher UGF for greening that provides multiple benefits.

- 12.3.2 The London Plan has introduced a UGF scoring system for London, which will operate as a tool to assess the amount, type and value of greenery within development proposals. Further information on applying and calculating the UGF is set out in Urban Greening Factor, London Plan Guidance (February 2023).
- 12.3.3 The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City. The Study considered the potential for an UGF on a range of development types, including offices, residential, hotels and mixed commercial. Policy OS2 requires major development proposals in the City (commercial and residential) to include an UGF calculation demonstrating how it will meet the minimum UGF target of 0.3.

### **How the policy works**

- 12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible. Can take many forms and require careful design, installation and regular maintenance.
- 12.3.5 Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.
- 12.3.6 There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones (including BioSolar green roofs) having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers seek to install intensive green roofs with deep substrates for amenity space, these are expected to be of high quality design incorporating rainwater harvesting for irrigation to minimise water use.
- 12.3.7 Green roofs should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately for the life of the building to maximise the roof's environmental benefits including biodiversity, rain-water run-off attenuation and building insulation. The choice of plant species for green roofs should be consistent with the Biodiversity Action Plan (BAP) and Climate Resilience Strategy and development proposals should aim to promote diverse planting including (where practical) forage for target pollinator species.
- 12.3.8 Development proposals could include greening of roofs, facades, terraces and balconies, both internal and external, and/or landscaping and tree planting

around the building depending on the circumstances of each site. The UGF assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development. Urban greening should be considered at an appropriate stage in the design of the scheme, and scores should not be reduced as conditions are discharged. Internal greening which is fully enclosed does not contribute towards the UGF target score.

## 12.4 Policy OS3: Biodiversity

Development should incorporate measures to enhance biodiversity, including:

1. Retention, protection and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
2. Measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats and action plans;
3. Green roofs, gardens and terraces, soft landscaping and trees and green walls where appropriate;
4. Helping to create green corridors and biodiversity links and utilising roof terraces and gardens as stepping stones to contribute towards a green network;
5. Wildlife-friendly features, such as nesting or roosting boxes and nesting opportunities for wild bees and other pollinators;
6. Planting mix with a variety of vegetation types including flower-rich perennial planting to encourage biodiversity, supporting pollinators and other invertebrate groups;
7. Planting which will be resilient to a range of climate conditions, with a high proportion of native plants and the provision of year-round forage for pollinators;
8. A lighting scheme designed to minimise impacts on biodiversity.

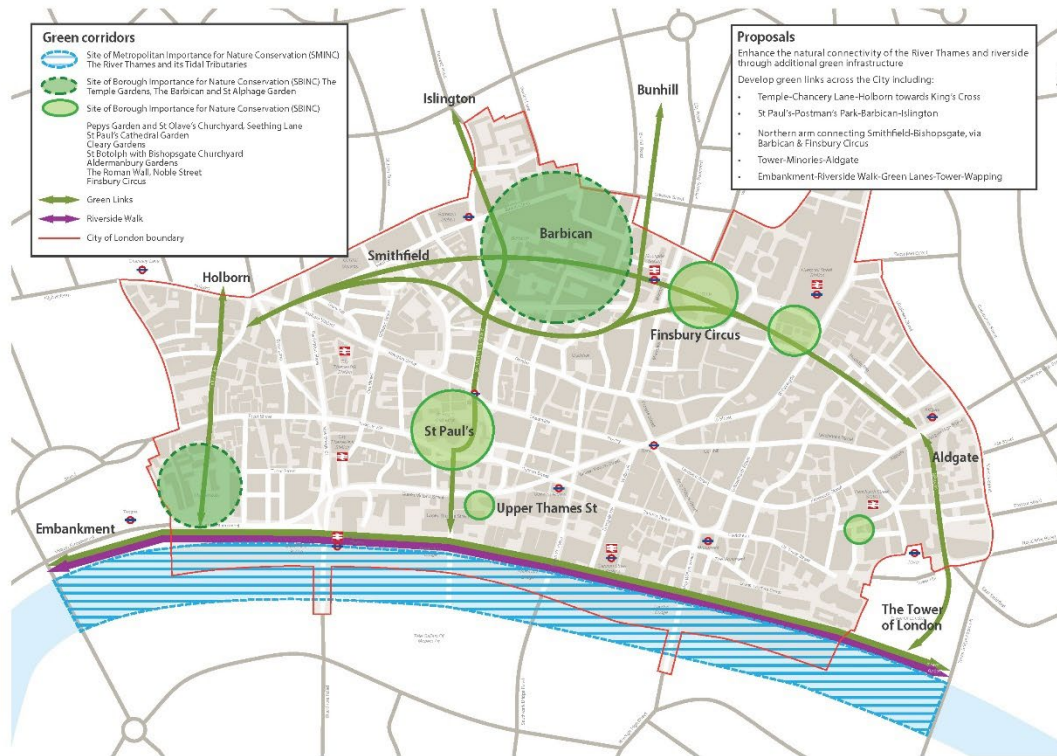
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### Reason for the policy

12.4.0 Protecting and improving biodiversity involves enhancing wildlife populations and their habitats. This has positive impacts for the environment, the economic and social life of the City and the aesthetics of the streetscape. Healthy biodiversity should be viewed as a sign of a healthy environment and healthy city.

12.4.1 A number of areas along the riverside, west of Farringdon Street and east of Bishopsgate have been identified as Areas of Deficiency in Access to Nature (SINC AoD) by Greenspace Information for Greater London (GiGL) London's environmental records centre and the Mayor of London. SINC AoDs are defined

as built-up areas more than 1km walking distance from accessible Sites of Importance for Nature Conservation (SINCs). The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species. However this SMINC has limited access to nature so does not alleviate AoD in the City. It is important that opportunities are taken to improve biodiversity throughout the City, and particularly in areas where this would improve green corridors or biodiversity links, such as along the riverside.



**Figure 18: Green corridors**

## How the policy works

12.4.2 Measures to enhance biodiversity should provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles) and by extension a wider range of insects and birds. The City of London BAP provides further details about the target species, their target habitats and action plans. The City has 13 SINCs, including three new SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were agreed following a review in 2016. Two existing SINCs were agreed to be upgraded as part of this review: Barbican and St Alphege's Garden, which includes the Barbican Wildlife Garden and the Beech Gardens, was upgraded from Grade 2 to Grade 1 Site of Borough Importance for Nature Conservation (SBINC); and Roman Wall, Noble Street, which was extended southwards to include St Anne and St Agnes Churchyard and was upgraded from a Local SINC to a Grade 2 SBINC. These new and upgraded SINCs will formally take effect upon adoption of this Plan.

- 12.4.3 New developments should seek to protect and enhance biodiversity and the City's environmental assets. This can be achieved by providing spaces for biodiversity to flourish through the retention and planting of trees and soft landscaping, along with green roofs and green walls where appropriate. A variety of these provisions in one development will create habitats for a range of different wildlife species. Native plant species or species that are of value to biodiversity including pollinators should be incorporated into any formal landscaping areas and other greening. Biodiverse pollinator friendly planting including fruiting and flowering perennials, shrubs and trees should be incorporated in planting mixes. Where possible incorporation of planting that can support invertebrate life cycles such as food and laying resource for butterflies and moths. Further information on pollinators and other target species is set out in the BAP.
- 12.4.4 Joined up green spaces and corridors which link SINC sites give species a better chance of survival in the urban landscape and greater resilience to future climate change. Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.
- 12.4.5 The City's wildlife depends not only on greenery but also on the built environment. Buildings can provide roosting sites for bats and nesting opportunities for birds. Artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species. Biodiverse features of value to wildlife that support the City of London's BAP, including target species and target habitats but are not included within the Department of Environment, Food and Rural Affairs (Defra) Biodiversity Metric (DBM) 4.0. These should be provided in suitable locations, in close proximity to green features, and should include but are not limited to bird boxes, bat boxes and wild bee nesting habitat (cavity and ground nesting) and invertebrate hotels. Target habitats should be provided in suitable locations, in close proximity to green features, and should include but are not limited to bird boxes, bat boxes and nesting habitat (cavity and ground nesting) for appropriate pollinators (including wild bees and bumblebees) and invertebrate hotels. This could include artificial interventions such as bee bricks, leaving areas of bare ground and creating mounds with the incorporation of sandy loam substrates.
- 12.4.6 Wild bees (bumblebees and solitary bees) are one of the target species identified in the BAP and the City is home to domesticised honey bees. There is an over proliferation of honey bees in the City and beehives aimed at attracting or accommodating them should not be included in the design of development schemes. Honey bees in the City are a major risk to wild bees and other pollinators as their abundance and competition limits forage resources.
- 12.4.7 Where development has a potential impact on designated sites of importance for biodiversity in or near the boundary of the site, the developer should submit an appropriate Ecological Assessment outlining how any impacts will be avoided, minimised or mitigated. Where necessary, the City Corporation will seek independent review of an assessment, paid for by the developer.

12.4.8 As set out in the BAP, the City of London recognises the importance of biodiversity data collection to improve monitoring and informs decisions and identify future areas of priority in the City. Planning applications should include biodiversity data informed by an up-to-date search report by GiGL. Opportunities such as citizen science and school projects and records collected by local voluntary individuals and groups make a significant contribution in supporting biodiversity and raises the profile of species and habitats within the City. Many of these findings are reported directly to GiGL.

## 12.5 Policy OS4: Biodiversity Net Gain

Major developments are required to deliver Biodiversity Net Gain (BNG) to conserve and enhance biodiversity through the following measures:

1. Meeting the City's BNG target on-site score of achieving a minimum of three biodiversity units per hectare (BU/ha);
2. Providing the biodiversity value of the site pre-development and post-development after applying the mitigation hierarchy. Information on habitats of known value to biodiversity to be incorporated and maximised on-site, achieving a minimum three BU/ha;
3. Any off-site areas proposed for habitat creation or enhancement for both pre-development and post development. However the City expects delivery to be achievable on-site and off-site provision should be a last resort;
4. If it is not feasible to achieve the target score on-site then offsetting will be required, with preference given to off-setting schemes that help with the delivery of wider City of London Corporation policies and strategies, through the use of nature-based solutions and maximise opportunities for local nature recovery;
5. Providing the following information:
  - A Preliminary Ecological Appraisal Report (PEAR) or other appropriate Ecological Assessment alongside a survey of habitat and a completed Defra Biodiversity Metric (DBM) spreadsheet at planning application stage;
  - A Biodiversity Gain Plan (BGP) setting out the enhancements that will be incorporated on-site to meet the BNG score, secured through condition prior to commencement of the development;
  - A Habitat Management and Monitoring Plan (HMMP) setting out maintenance, management and monitoring of enhancements and the post-development biodiversity values of the site, secured through condition prior to commencement.

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### Reason for the policy

12.5.0 Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a better state than before. Major new developments are required to deliver BNG and the Environment Act 2021 requires them to provide a minimum 10% BNG. Habitats will need to be secured for at least 30 years and

Defra's statutory Biodiversity Metric (DBM) 4.0 is the current method for calculating BNG but this may change. Due to the City's highly urban nature and the high proportion of sites with a zero (or close to zero) baseline for biodiversity, the mandatory 10% BNG is not considered an apt mechanism for delivering meaningful biodiversity improvements in the Square Mile; an approach using biodiversity units per hectare (BU/ha) is more appropriate. The City's BNG policy is in addition to government's BNG regulations and should be read in conjunction with NPPF, BNG legislation, regulations and BNG Planning Practice Guidance.

- 12.5.1 The Biodiversity Net Gain Study (2023) examined a range of development sites across the City and found that if biodiversity were maximised on these sites, they could have delivered an average of 3.41 biodiversity units per hectare (BU/ha). This evidence has informed the policy target set of achieving a minimum of three BU/ha rather than a percentage increase.

### **How the policy works**

- 12.5.2 All major developments are expected to submit a Preliminary Ecological Appraisal Report (PEAR) or other appropriate Ecological Assessment alongside a completed Defra Biodiversity Metric (DBM) in line with national requirements setting out how the development will meet the City of London's BNG target score of achieving a minimum three BU/ha on-site. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should include baseline and proposed habitat mapping. When determining the Biodiversity Gain Plan (BGP), the Biodiversity Gain Hierarchy emphasises that on-site biodiversity gain should take priority above off-site and biodiversity credits. The City of London Corporation may seek independent ecological advice to review submitted BNG reports. It is expected this independent assessment will be funded by the developer and further information may be sought.
- 12.5.3 To ensure the biodiversity objectives are met BNG should be considered throughout the planning process. The latest DBM or agreed equivalent will be used to quantify the biodiversity value of the site pre-development, post-development after application of the mitigation hierarchy and for any off-site areas proposed for habitat creation or enhancement both pre and post development. The City Corporation expects habitat creation to be delivered and maximised on-site providing biodiversity to the immediate area before off-setting is considered. Biodiverse features of value to wildlife should support the City of London's BAP, including target species and target habitats, but are not included within the DBM. Developers are expected to set-out BNG as an integral design aspect of the overall scheme and deliver meaningful ecology to increase levels of biodiversity in the City. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should include baseline and proposed habitat mapping. Section 106 obligations may be sought for monitoring of major applications for BNG delivery.
- 12.5.4 The Urban Greening Factor (UGF) tool establishes the provision of urban greening in new developments and does not measure biodiversity benefits of

proposals. However, higher scoring surface cover types within the UGF are often ones which can deliver benefits for biodiversity. There is an opportunity to unlock additional space for BNG by steering associated soft landscaping towards habitat creation therefore providing more biodiversity on-site which is of benefit to local wildlife.

## 12.6 Policy OS5: Trees

The City Corporation will seek to increase the number of trees and their overall canopy cover by:

1. Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate;
2. Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value;
3. Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value;
4. Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; and
5. Promoting tree planting to provide a diverse range of tree species, including large-canopy trees wherever practicable, especially in places that would contribute to the green routes set out in Figure 18.
6. Ensuring tree species are consistent with the Climate Action Strategy and Biodiversity Action Plan (BAP), and promote habitats and forage for target species, especially pollinators.

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### Reason for the policy

12.6.0 There are just over 2,500 trees in the City, which are found in a variety of locations: along streets, in open spaces such as churchyards and livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.

12.6.1 Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to enhancing amenity and townscape. Trees provide a wide range of benefits in the urban environment, including the trapping of air pollutants, enhancing biodiversity, providing shade and shelter from sun and rain, absorbing rainwater and filtering noise.



- 12.6.2 The City of London Tree Strategy SPD aims to increase the number of City Corporation owned trees and ensure that all trees within the City are managed, preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the townscape for both current and future generations. The Tree Strategy SPD will be kept under review and should be read alongside the City of London Biodiversity Action Plan (BAP).
- 12.6.3 Trees play an important role in connecting green spaces to create green corridors. Additional planting where feasible will help to reinforce those corridors. The green routes identified in Figure 18 set out priority corridors for greening the City. It is important that new tree planting includes a variety of species to increase the resilience of the City's tree stock against the threat of disease and the impacts of a changing climate.

### **How the policy works**

- 12.6.4 Developers will be expected to safeguard existing trees, plant new trees and only remove trees in exceptional circumstances. Where trees are removed during development works, replacement trees of an appropriate species, height and canopy cover must be planted when works are completed. The City Corporation will seek financial compensation for any trees removed or damaged without permission. This value will be based on a recognised tree valuation method such as the Capital Asset Value for Amenity Trees (CAVAT) or i-Tree Eco.
- 12.6.5 The City Corporation will use TPOs, s106 planning obligations or conditions to ensure the retention of existing trees and the provision of new trees.

# 13. Climate resilience

## 13.1 Strategic Policy S15: Climate Resilience and Flood Risk

Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

1. Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;
  2. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
  3. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and
  4. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.
- 

### Reason for the policy

- 13.1.0 Today's new buildings will probably be in place for decades or longer and must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will help keep the City safe and comfortable as climate patterns change. The UK Climate Projections (CP18) predict that London will experience a rise in mean temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an urban heat island effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review.
- 13.1.1 Although the total annual rainfall is projected to remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.
- 13.1.2 The City lies within the tidal section of the Thames and is vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan identifies the need for the existing flood defences in central London to be raised by up to 0.5m by 2050 and 1m between 2050 and 2100 to protect London from flooding.

## How the policy works

13.1.3 The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making through implementation of, and annual monitoring and review of, the City Corporation's Climate Action Strategy. UK Climate Projections and the detailed actions in this Climate Action Strategy form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.

## 13.2 Policy CR1: Overheating and Urban Heat Island Effect

1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:
    - solar shading to prevent solar gain, particularly on glazed facades;
    - urban greening to improve evaporative cooling;
    - passive ventilation and heat recovery;
    - use of thermal mass to moderate temperature fluctuations;
    - minimal reliance on energy intensive cooling systems.
  2. Building designs should minimise any contribution to the urban heat island effect.
- 

## Reason for the policy

- 13.2.0 Development presents an opportunity to renew or adapt the existing building stock and public spaces, or provide new buildings and spaces, which will cope better with changing climate patterns. The design of buildings should reduce energy demands from cooling infrastructure, making them more resilient to higher temperatures. Measures such as urban greening and design features that provide shade and shelter can have a positive impact on or near the building, minimising the urban heat island effect (see Policy OS2).
- 13.2.1 Climate adaptation measures can contribute to wider benefits by pre-empting potential detrimental climate impacts. Careful selection of plants which are resilient to a range of weather conditions will assist wildlife to survive changed climate conditions. Urban greening and reduced reliance on air conditioning will have benefits for the City's air quality.

## How the policy works

- 13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be

minimised. BREEAM credits for adaptation to climate change should be targeted.

13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.

### **13.3 Policy CR2: Flood Risk**

All development within the City flood risk area, and major development elsewhere, must be accompanied by a site-specific flood risk assessment demonstrating that:

1. the site is suitable for the intended use, in accordance with the sequential and exception tests (see tables 4 and 5) and with Environment Agency and Lead Local Flood Authority advice;
  2. the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere;
  3. safe access and egress routes are identified; and
  4. flood resistance and resilience have been designed into the proposal.
- 

#### **Reason for the policy**

13.3.0 While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water or sewer overflow in the former Fleet valley.

13.3.1 The Policies Map identifies the areas at risk from these sources as the City flood risk area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

#### **How the policy works**

13.3.2 Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment (SFRA) and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development. Design and mitigation measures such as sustainable drainage systems may provide protection from flooding for properties beyond the site boundaries.

13.3.3 Within the City Flood Risk Area different uses will be acceptable in different zones. Table 2 shows the vulnerability classifications and Table 5 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. The Environment Agency's flood zones are shown on the Policies Map. The sequential test must be applied for all development other than minor development or change of use in the City flood risk area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water or

sewer flooding. Where a change of use results in a more vulnerable use, evidence must be presented to demonstrate safety and suitable access and egress routes. Where necessary, conditions may be attached to planning permissions to manage the change of use into more vulnerable categories.

<b>Essential Infrastructure</b>	<ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations</li> </ul>
<b>Highly Vulnerable</b>	<ul style="list-style-type: none"> <li>• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Installations requiring hazardous substances consent.</li> </ul>
<b>More Vulnerable</b>	<ul style="list-style-type: none"> <li>• Hospitals</li> <li>• Residential institutions such as care homes and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Sites used for waste management facilities for hazardous waste.</li> </ul>
<b>Less Vulnerable</b>	<ul style="list-style-type: none"> <li>• Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure.</li> <li>• Police, ambulance and fire stations which are not required to be operational during flooding.</li> <li>• Waste treatment (except hazardous waste facilities).</li> </ul>
<b>Water-compatible development</b>	<ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Sewage transmission infrastructure and pumping stations</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> </ul>

**Table 2: Flood risk vulnerability classifications relevant to the City**  
**Source: Relevant uses from Planning Practice Guidance (Flood Risk and Coastal Change)**

13.3.4 If the intended use of a site falls into one of the categories where an exception test is required, as set out in Table 3, the developer will need to investigate whether there is a reasonably available site outside the City flood risk area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the exception test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Flood Risk Vulnerability classification	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
EA Zone 1	✓	✓	✓	✓	✓
EA Zone 2	✓	Exception Test required	✓	✓	✓
EA Zone 3a	Exception Test required	x	Exception Test required	✓	✓
EA Zone 3b	Exception Test required	x	x	x	✓
SFRA Surface water/sewer flood risk areas	Exception Test required	x	Exception Test required	✓	✓

**Table 3: Suitability of different uses in flood zones**

Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

- 13.3.5 The City of London SFRA provides guidance on suitable flood resistance measures to prevent water entering the building and flood resilience measures, which enable speedy recovery in the event of flooding. These measures should be specified for all development within the City flood risk area and may be controlled by condition. Passive design measures such as suitable threshold levels and the use of flood resilient materials will be favoured over active measures such as removable flood barriers. All sleeping accommodation must be located above the modelled tidal breach level as shown in the SFRA unless it can be demonstrated that a permanent fixed barrier at the threshold of the property would prevent water ingress in a breach event.
- 13.3.6 Design measures can help to reduce flooding, thus protecting the local area beyond the development site, through:
- sustainable drainage systems;
  - green/blue roofs; and
  - rainwater reuse, recycling and attenuation
- 13.3.7 Resistance to flooding can be achieved through design measures such as:
- raised kerbs and altered topography which contains water at a distance from the building;
  - avoiding opening windows or vents at ground floor or basement levels;
  - using low permeability materials to limit water penetration of external walls, and flood resistant doors to prevent water ingress; and
  - fitting non-return valves on plumbing to prevent sewer surcharge within the building.
- 13.3.8 Flood resilience measures make clean up after a flood more efficient, and include:
- avoiding locating sensitive equipment such as computer servers at lower levels of buildings in flood prone areas;
  - locating all fittings, fixtures and services at a suitable height to minimise damage by flood waters;
  - using impermeable surfaces and structures; and
  - providing sumps and soak-aways that gradually release water to the sewer network.
- 13.3.9 In order to demonstrate that the development will be safe for occupants, flood warning and evacuation plans should be provided for all 'more' or 'highly' vulnerable development within the City flood risk area. Details of the type of measures which should be included in an evacuation plan are set out in the City's SFRA.
- 13.3.10 For minor development outside the City flood risk area, an appropriate flood risk statement should be included in the Design and Access Statement.



## **13.4 Policy CR3: Sustainable drainage systems (SuDS)**

1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
  2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as close as possible to greenfield rates and the number of discharge points has been minimised.
  3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
  4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
  5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.
- 

### **Reason for the policy**

- 13.4.0 The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City flood risk area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.
- 13.4.1 More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

### **How the policy works**

- 13.4.2 All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.
- 13.4.3 For major development, pre-application discussion with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the

Environment Agency, Thames Water and other interested parties is encouraged to ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan drainage hierarchy (see London Plan policy SI 13) and local requirements should be discussed at pre application stage with the City Corporation.

- 13.4.4 Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.
- 13.4.5 For all major development, a separate SuDS and Drainage Plan must be submitted at application stage. For minor development the Design & Access Statement should include details of how rainwater run-off has been minimised. Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.
- 13.4.6 Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.
- 13.4.7 Arrangements for maintenance throughout the life of the building must be considered in the design of SuDS. Planning conditions may be used to secure a suitable operations and maintenance plan.

## **13.5 Policy CR4: Flood protection and flood defences**

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
  2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm.
- 

### **Reason for the policy**

- 13.5.0 The City of London is protected from flooding by the Thames Barrier, and more locally by flood defence walls along the River Thames. The Thames Estuary 2100 (TE2100) project recognises the need for the raising of flood defences by up to 0.5m by 2050 and 1m by 2100.

### **How the policy works**

- 13.5.1 Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future flood defence raising without adverse impacts on river views, the setting of historic buildings and pedestrian movement along the Riverside Walk. Constraints may exist where flood

defences form part of an existing building. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.

- 13.5.2 A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

## **13.6 Strategic Policy S16: Circular Economy and Waste**

1. The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities (WPAs) in planning for capacity to manage the City's residual waste through:
  - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other London WPAs;
  - Co-operating with WPAs within and beyond London to plan for suitable facilities for the City's waste;
  - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste; and
  - Monitoring waste movements to and from the City and reviewing its waste arisings and capacity study at least every five years.

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### **Reason for the policy**

13.6.0 The City Corporation has responsibility to plan for adequate facilities to manage the waste that originates in the City. This includes waste collected from the City's households and businesses, waste generated in the process of redevelopment and hazardous waste from premises such as St Bartholomew's Hospital.

13.6.1 The London Plan and the London Environment Strategy set the framework for waste management in London. These strategies promote circular economy principles and the waste hierarchy: prevention, preparing for reuse, recycling, other recovery, and disposal only as a last resort.

13.6.2 The current London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage 90,000 tonnes of waste annually by 2041, with an apportionment in 2021 of 84,000 tonnes. This figure represents

the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's household and commercial and industrial waste from 2026.

- 13.6.3 The London Plan sets out criteria for the selection of waste management sites, which the City of London Waste Arisings and Waste Management Capacity Study review 2016 used to evaluate potential sites in the City. This study concludes that, with current technologies and economic considerations, there is no viable waste management capacity within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries.
- 13.6.4 The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Joint Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum and will work with the GLA and the Environment Agency to improve waste planning.
- 13.6.5 For commercial reasons, a proportion of the City's waste will continue to be transported to sites outside London. This includes construction, demolition and excavation (CD&E) waste which is not covered by the Mayor's targets for net self-sufficiency. Annual monitoring of such waste exports will inform Duty to Co-operate discussions with receiving authorities within and outside London to ensure that sufficient capacity remains in the planning pipeline.
- 13.6.6 The London Plan sets out apportionments for land-won aggregates, which does not include the City of London and there is no requirement to include a policy for minerals within the Local Plan. Application of circular economy principles encourages the re-use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported aggregates and retain embodied carbon.
- 13.6.7 It is imperative that the City adopts circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment.

### **How the policy works**

- 13.6.8 The City Corporation will continue to monitor the quantities and types of waste originating in the City and work with the City's communities to minimise this waste, applying circular economy principles to design out waste and pollution and keep products and materials in use. The City Corporation will continue to work with the South-East London Joint Waste Planning Group and other WPAs

in London and beyond to ensure that the City's waste apportionment is met and that suitable facilities are available for the City's waste to be managed in the most sustainable way.

- 13.6.9 Changing economics and new waste management technologies means that small scale waste management is becoming more viable within the City, particularly within large development sites.
- 13.6.10 During the period 2021-2041 a proportion of the City of London's waste will continue to be managed outside London. Co-operation with WPAs outside London will aim to ensure that facilities with sufficient capacity remain available to accept the City's waste during this period.
- 13.6.11 The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.
- 13.6.12 Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged. The level of detail required at the planning application stage will be proportionate to the scale of development.
- 13.6.13 The Environmental Statement (for EIA applications) or Sustainability Statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

## **13.7 Policy CE1: Sustainable Waste Facilities and Transport**

All development proposals should incorporate waste facilities, which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.

The environmental impact of waste transport will be minimised through:

1. Encouraging the use of rail and waterways for removal of waste, including deconstruction waste and delivery of construction materials;
  2. Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;
  3. Requiring low and zero emissions transport modes for waste movement;
  4. Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi-site consolidation of waste.
-

## Reason for the policy

- 13.7.0 On major developments, opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and beyond the City. The City of London Waste Arisings and Capacity Study identifies a range of options which should be considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.
- 13.7.1 Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage of design to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be provided for, where necessary.
- 13.7.2 Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term-lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.
- 13.7.3 The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.
- 13.7.4 The proximity principle advocates that waste should be managed as close as possible to where it originates to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic, and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.
- 13.7.5 Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.

13.7.6 This policy aims to maximise the use of the River Thames for waste transport, encourage transport modes such as rail and other waterways and encourage efficient use of low and zero emissions road vehicles for transporting waste.

**How the policy works**

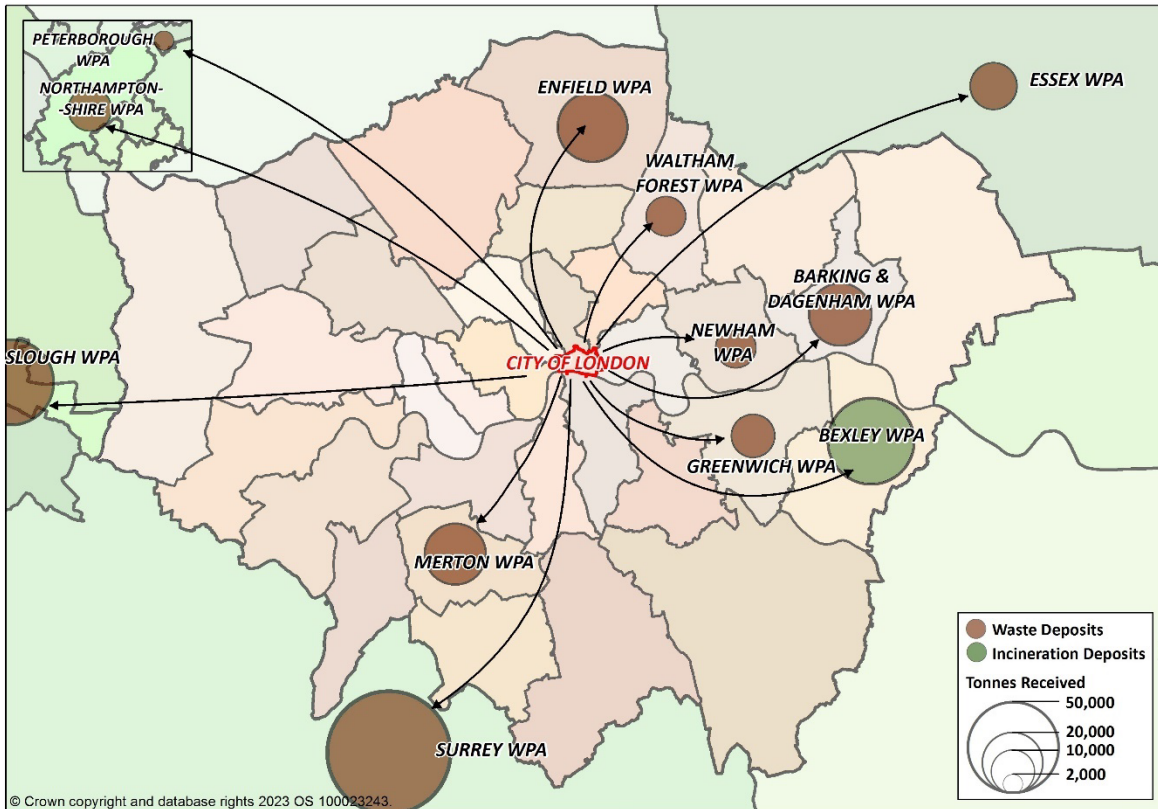
13.7.7 The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste, including the reduction of emissions from river transport.

**Major development**

13.7.8 Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles will be enabled during the operational phase of the building’s life.

**All other development**

13.7.9 Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed.



**Figure 19: Waste deposit locations 2021**

## 13.8 Policy CE2: New waste management sites

1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and Sustainability Statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:
  - the development will handle waste which has been generated locally;
  - access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
  - the carbon impact of the development will be minimised. New waste facilities generating energy from waste should comply with the Mayor's Carbon Intensity Floor (CIF); and
  - the development is resilient to natural and man-made safety and security challenges.
2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf, and development that would compromise the use of the river for waste operations, will be resisted.
3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.

### Reason for the policy

13.8.0 Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

### How the policy works

- 13.8.1 Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be a key matter in consideration of proposals. Mitigation which resolves potential conflicts may be necessary for development to proceed.
- 13.8.2 The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and conditions will be applied to ensure that any new facility is suitable for the City's high-density urban environment.



# 14. The Temple, the Thames Policy Area and the Key Areas of Change

## 14.1 Policy TP1: The Temple

The City Corporation will continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students, including providing professional accommodation for barristers. Development in the Temple area that supports these functions, including improvements to the accessibility of buildings, will be supported.

Opportunities to enhance and create additional greening and open spaces that enhance the historic character of the Temple will be encouraged.

Within the Temple, adjustments between professional and residential accommodation will be permitted where it is important to the functioning or character of the Temple, or to the continuing use of their buildings.

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### Reason for the policy

14.1.0 The Inner and Middle Temple are two of the Inns of Court which provide accommodation and enable education and training and many other facilities – such as libraries, meeting rooms, lecture rooms, and dining facilities – for the legal profession in the southwest of the City between Fleet Street and the River Thames. Along with other nearby Inns of Court and the Royal Courts of Justice in Westminster, the Temple forms part of a specialist legal cluster recognised in the London Plan. The Temple is within a Conservation Area and contains a significant concentration of listed buildings.

14.1.1 The Temple mainly contains barristers' chambers, together with other accommodation for Members of the Bar. The Inner and Middle Temple has a strong collegiate atmosphere due to the mix of workspaces, residential, commercial and communal uses. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

### How the policy works

14.1.2 In determining applications, the City Corporation will have regard to the importance and long-term balance of the continued existence of residential, office and support uses in the Temple and the contribution that this makes to their special character. However, the need to rationalise and refurbish chambers in order to maintain an efficient business and professional community

is recognised. To enable the continued use of the buildings in the Temple, physical changes to the fabric of the historic buildings, especially for the purposes of improved accessibility, may be required. Alterations and additions must be informed by and respect the unique historic and architectural character of the area and the buildings and structures within it.

## **14.2 Strategic Policy S17: Thames Policy Area**

The unique character of the City's riverside, and its uses for transport and recreation, will be enhanced by:

1. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the City of London Riverside Strategy and Riverside Walk Enhancement Strategy, particularly through:
  - protecting and enhancing permanent public access and river views along the Riverside Walk;
  - improving access to the River Thames by enhancing north-south routes and the widening of the Riverside Walk;
  - maximising opportunities for public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk;
  - improving the vibrancy of the riverside by requiring new development to provide active frontages where appropriate;
  - encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value; and
  - provision of publicly accessible roof terraces, where they do not impact adversely on protected views, the amenity of occupiers or nearby residents.
2. Supporting, and safeguarding land for, the construction of the Thames Tideway Tunnel.
3. Promoting the use of the River Thames and its environs for transport, navigation and recreation, particularly through:
  - safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
  - encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
  - retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;

- refusing development on or over the River Thames, except for structures that specifically require a waterside location for river-related uses;
- resisting the permanent mooring of vessels; and
- maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

4. Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation (SMINC) and seeking opportunities to create or enhance riverside habitats.

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### **Reason for the policy**

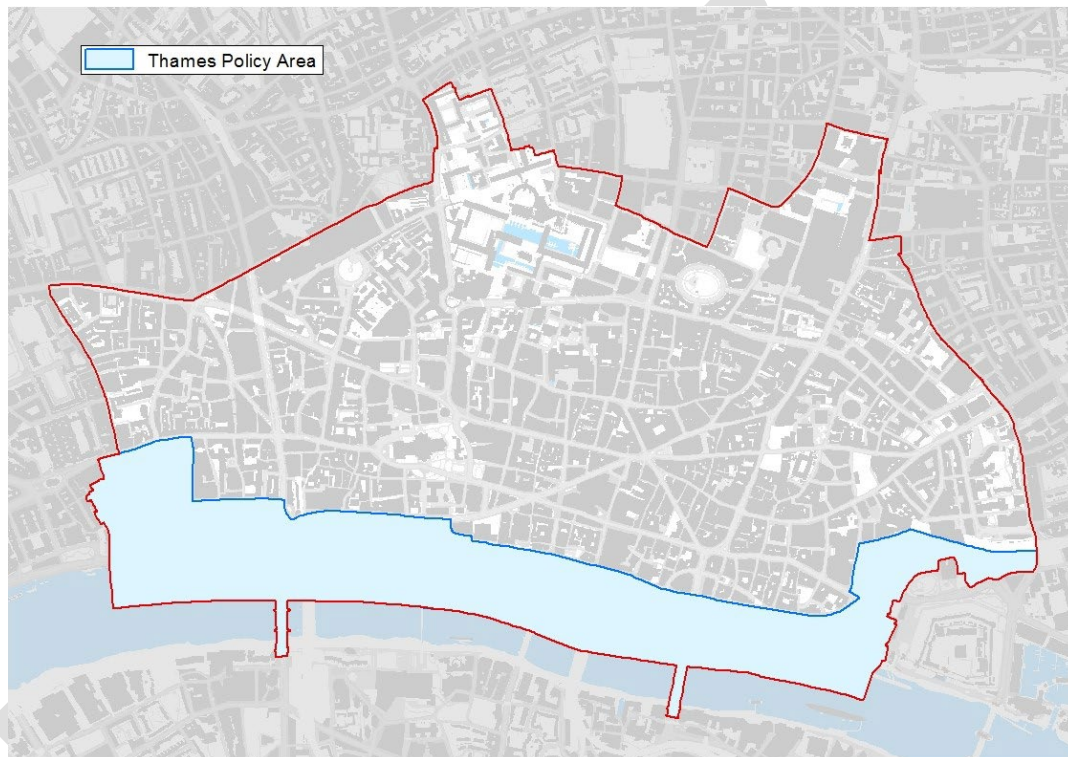
14.2.0 The River Thames is an iconic feature of London and the City. The riverside provides a breathing space from the busy environment that characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames. However, the riverside is not currently fulfilling its potential as a recreation, leisure and tourism destination despite its many positive attributes.

14.2.1 The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City, a key environmental asset, and a Site of Metropolitan Importance for Nature Conservation (SMINC). The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.

14.2.2 There are a range of different strategies and plans which affect the River Thames including:

- The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area.
- The Mayor of London's Safeguarded Wharves Review 2018-19, which aims to ensure that London's need for waterborne freight-handling uses is met.
- The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues.
- The Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.
- The City of London Riverside Strategy, which provides guidance for the management of the river flood defences in the Square Mile, including the approach to raising the flood defences over the coming century whilst also providing benefits to the workers, residents and visitors that use the Thames river frontage.

- The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements.
- Guidance called A Safer Riverside produced by the Port of London Authority, which aims to reduce the number of people drowning in the Thames by ensuring that safety is an intrinsic part of all development alongside and on the tidal Thames.
- The UK Marine Policy Statement and the South East Marine Plan (2021) produced by the Marine Management Organisation, provide a wider strategic context.



**Figure 20: Thames Policy Area**

- 14.2.3 The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.
- 14.2.4 The London Plan notes that no joint strategy currently exists for the central section of the Thames between Chelsea and Tower Bridge, and the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy.
- 14.2.5 A key infrastructure project is the development of the Thames Tideway Tunnel, which is a 25km tunnel running mostly under the tidal section of the River

Thames through central London. It is intended to capture and divert storm overflows, including the Fleet Combined Sewer Outflow at Blackfriars, to Beckton Sewage Treatment Works to avoid discharging them into the River Thames.

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### **14.3 Strategic Policy S18: Blackfriars**

The character and amenities of the Blackfriars Key Area of Change will be enhanced by:

1. Making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the River Thames and the Riverside Walk for all;
2. Promoting comprehensive redevelopment or refurbishment of existing post-war buildings to provide new high quality office and commercial accommodation with active frontages at ground floor and mezzanine level and elevated public spaces including roof gardens;
3. Implementing the Thames Tideway Tunnel project and creating a high quality new area of public realm at Blackfriars Bridge foreshore (Bazalgette Embankment), and seeking opportunities to enhance the area underneath the Blackfriars undercroft for suitable sports, leisure, or recreation;
4. Enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside, including appropriate widening of the Riverside Walk, improvements to Blackfriars Underpass, and the provision of new and improved links across Queen Victoria Street and Upper Thames Street to provide new north-south routes;
5. Seeking provision of a new entrance to the east side of Blackfriars Station that gives improved pedestrian connectivity to the riverfront;
6. Preserving, enhancing and celebrating the area's heritage and historic assets and giving careful consideration to protected views;
7. Encouraging new cultural, leisure and recreation facilities, the retention or renewal of existing facilities where appropriate, and events, arts and play in public spaces; and
8. Improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of The Guild Church of St Benet Paul's Wharf.

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#### **Reason for the policy**

14.3.0 The area contains a mix of uses, including offices and commercial uses, the City of London School, the Mermaid Events Centre, The Guild Church of St Benet Paul's Wharf, a public car park, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, few active frontages and a lack of open space. The area has a rich history including the Dominican monastery and Blackfriars Theatres and

likely archaeological remains, including those relating to Baynard's Castle, which should be celebrated and better revealed as part of redevelopment.

- 14.3.1 It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the Riverside Walk from the rest of the City. Access to the Riverside Walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark, and Blackfriars Station is a major underground and rail station.
- 14.3.2 There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new area of public realm (Bazalgette Embankment) built out into the river west of Blackfriars Bridge, which is due for completion in 2025/26. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views. The Riverside Walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area.
- 14.3.3 Comprehensive redevelopment would provide an opportunity for public realm improvements along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. New active frontages will be sought as an integral part of any redevelopment. Pedestrian links across Upper Thames Street will be improved wherever possible to link the riverside to the rest of the City and to provide easier access to Blackfriars Pier. Proposals for redevelopment and the redesign of streets would be required to enhance the setting of The Guild Church of St Benet's Paul's Wharf and make it a more pleasant area to visit and dwell.
- 14.3.4 The public realm created by the Thames Tideway Tunnel project west of Blackfriars Bridge (Bazalgette Embankment) will introduce additional greenery to the riverside and will bring more activity to the area by providing a new place for relaxation and recreation. This facility will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new area of public realm, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route, including appropriate widening, between Blackfriars Bridge and Millennium Bridge. There is potential to enhance heritage assets and their setting by increased pedestrian permeability and there will be new views of Blackfriars Bridge and this part of the City from the new area of public realm.



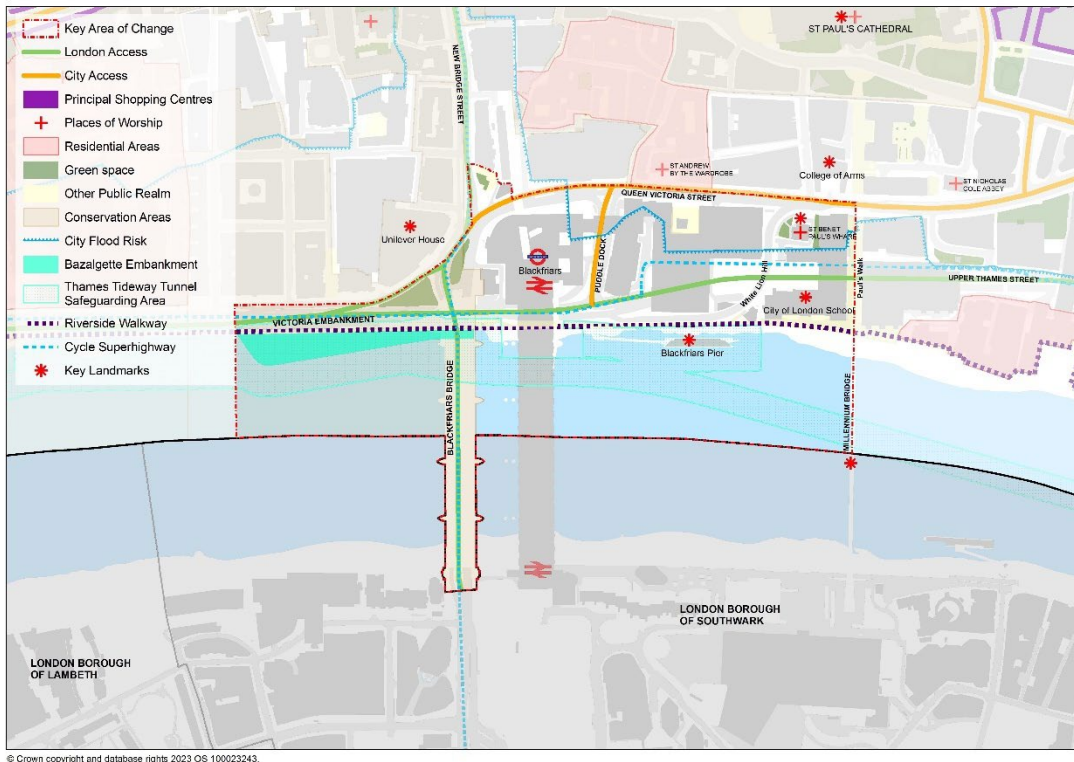


Figure 21: Blackfriars existing context

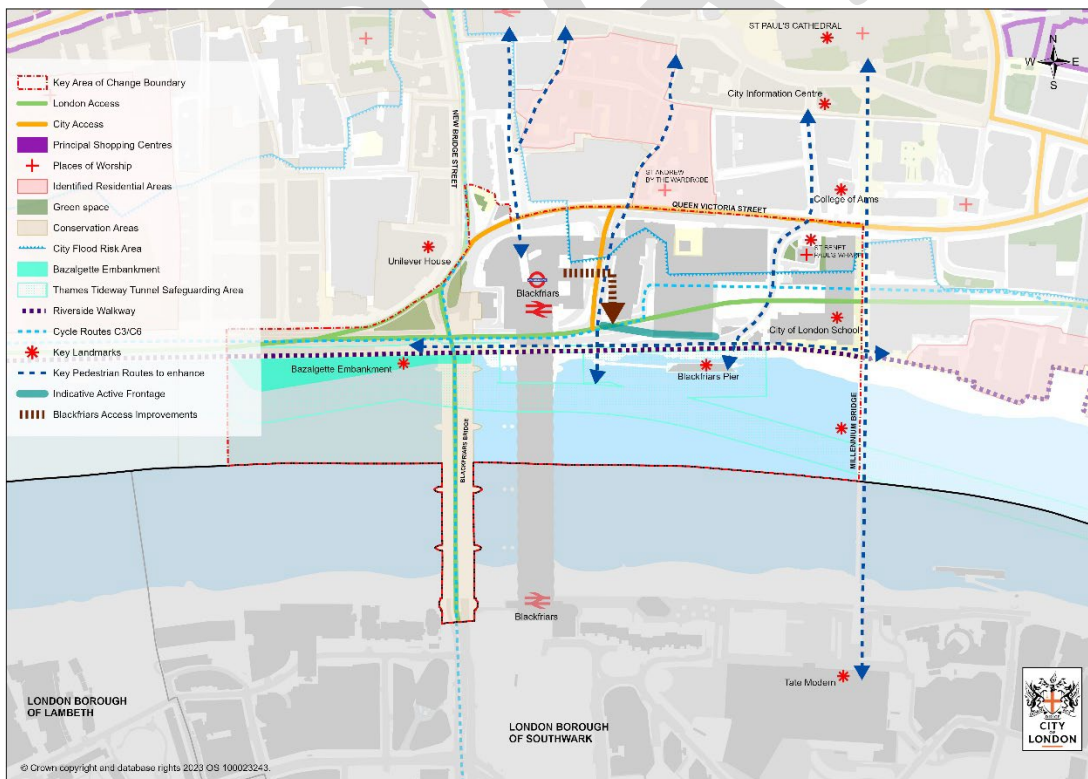


Figure 22: Blackfriars Spatial Priorities



## 14.4 Strategic Policy S19: Pool of London

The Pool of London Key Area of Change will be renewed through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:

1. Making the area's buildings, streets and public spaces more inclusive, accessible, welcoming and vibrant, with a mix of uses that encourages more activity and greater enjoyment of the River Thames, public spaces and the Riverside Walk for all;
2. Enabling office-led mixed commercial use redevelopment or refurbishment, including the provision of retail, cultural and leisure uses that are complementary to, and do not detract from, the primary business function of the City and that enhance heritage assets.
3. Requiring increased vibrancy and active frontages at ground floor, rooftop and terrace levels, through the provision of retail and publicly accessible leisure and cultural uses on the river frontage.
4. Encouraging the provision of recreation, cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Culture and Vibrancy Plans.
5. Maximising opportunities to increase the quantity and quality of public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk;
6. Optimising the use of historic assets and spaces around them in ways that help to better reveal their heritage, create inclusive and welcoming environments and help to make the riverfront more vibrant and accessible for all;
7. Preserving and enhancing the area's significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation.
8. Improving transport connections and pedestrian links by:
  - improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
  - improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;
  - improving signage to and from the Pool of London to the Tower of London;
  - improving the servicing of buildings, encouraging the development of shared servicing bays and access points and collaborative management; and

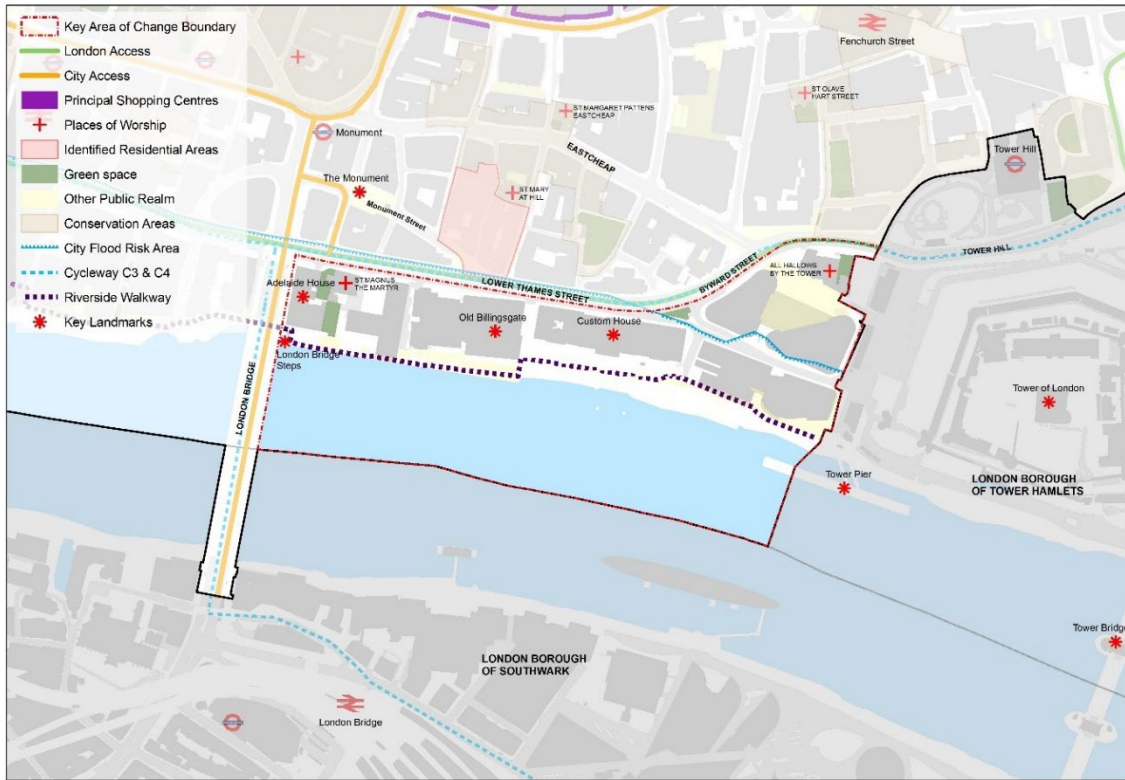
- preventing vehicular access onto the Riverside Walk and removing car parking areas upon redevelopment.
9. Enhancing public realm and public spaces by:
- enhancing the Riverside Walk to create a continuous publicly accessible walkway free of cars between London Bridge and Tower Bridge which is accessible to all;
  - identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and buildings on redevelopment; and
  - maximizing opportunities from development to create additional inclusive public space and play facilities.

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### **Reason for the policy**

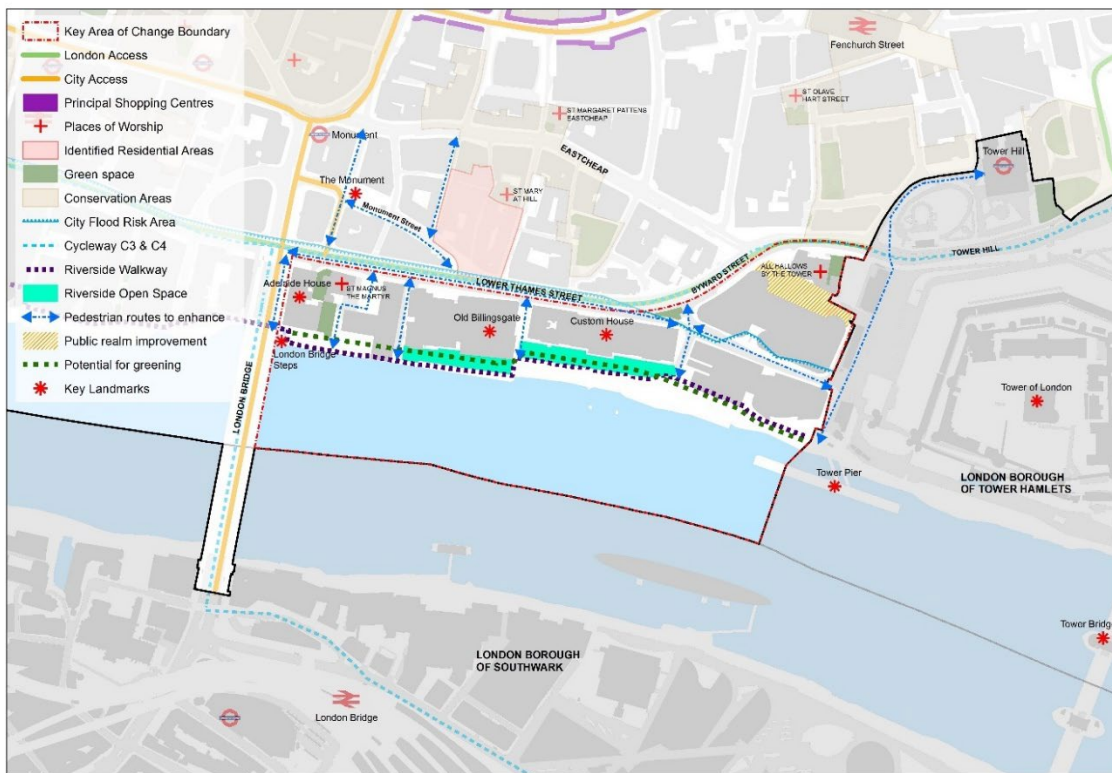
- 14.4.0 The area is the heart of what was once the historic port of London and is adjacent to the Tower of London. It contains key heritage assets including Custom House; the churches of All Hallows by the Tower and St Magnus the Martyr; Adelaide House; Old Billingsgate Market and the quay, cranes and stairs on the riverside in front of Custom House.
- 14.4.1 Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is very poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge. However, there is limited retail or ground floor vibrancy and the public realm is uninspiring and does not reflect the importance of this area.
- 14.4.2 There is an opportunity for renewal through development and public realm improvements that enhance and better-reveal heritage assets. The aim is to achieve a City riverside that complements the south bank while retaining and enhancing its own distinct character.
- 14.4.3 The Riverside Walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath Old Billingsgate Market and the Billingsgate Roman House and Baths are Scheduled Monuments.
- 14.4.4 There is potential to provide interpretation of the historic development of the area, its relationship with the original site of London Bridge and the significance of the riverside, and to improve appreciation and enjoyment of historic interiors for all.

- 14.4.5 While the area will retain its strategically significant office uses, there is significant potential to enhance the area for visitors, tourists, children and young people, and those working and living in and around the City, providing cultural experiences and opportunities to spend time by and enjoy the riverside.
- 14.4.6 Publicly accessible retail, cultural and leisure uses will be encouraged at ground floor level throughout the Pool of London to increase vibrancy and provide active frontages. Key open spaces in front of buildings should be enhanced and public access improved. Existing car parks should be replaced with inclusive publicly accessible open spaces and proposals to restrict public access will be resisted. As well as delivering improvements in accessibility, vibrancy and public realm at street level, the City Corporation will encourage the provision of new, publicly accessible roof terraces and viewing areas through building redevelopment or refurbishment, whilst safeguarding existing protected views.
- 14.4.7 Redevelopment and refurbishment offer the opportunity to revisit existing servicing arrangements. Developers will be encouraged to work with adjoining landowners to deliver shared servicing strategies and to minimise movements onto Lower Thames Street.
- 14.4.8 Despite its significance, the Pool of London is relatively isolated from the rest of the City by Lower Thames Street. Working with TfL, the City Corporation will seek the improvement of existing crossing points across Lower Thames Street and the creation of new crossing points to encourage greater movement between the riverside and the rest of the City, particularly to the Monument and Leadenhall Market further afield. Where possible, historic routes between the river and other areas of the City will be reinstated through the redevelopment and refurbishment of buildings.
- 14.4.9 The City Corporation will work closely with TfL, landowners and developers to design and deliver substantial improvements to the public realm along the riverside walk and routes to and along Lower Thames Street. Additional greening and open space will be encouraged, with tree planting in appropriate locations. Part of the Pool of London lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.



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**Figure 23: Pool of London Existing Context**



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**Figure 24: Pool of London Spatial Priorities**

## 14.5 Strategic Policy S20: Aldgate, Tower and Portsoken

The Aldgate, Tower and Portsoken Key Area of Change will be promoted as a mixed-use area, which balances the requirements of residents, workers and visitors, by:

1. Promoting a greater mix of development including commercial, residential, education and hotels supported by complementary cultural and community use development to assist in the further renewal of the area.
2. Supporting and enabling residential development in appropriate locations and identifying and meeting residents' needs, utilising a range of funding sources to:
  - maximise training, education and employment opportunities for residents;
  - maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;
  - create additional publicly accessible open and green space and additional accessible play space for children;
  - encourage local retail facilities; and
  - facilitate the regeneration of the Mansell Street Estate and adjacent sites, re-providing existing social housing, alongside additional residential units, reduced levels of air and noise pollution, community facilities and good quality open and play spaces.
3. Recognising the benefit and managing the impact of visitors to the area by:
  - enhancing Petticoat Lane Market, celebrating the character and history of the area and improving the visitor experience by working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders;
  - encouraging cultural events, arts and play in public spaces;
  - permitting additional hotels on appropriate sites; and
  - managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.
4. Improving transport connections and pedestrian connectivity by:
  - implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;
  - improving Aldgate Bus Station to improve air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;
  - sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;

- encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate and between Minories and Mansell Street;
  - improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;
  - enhancing links to the riverside walkway and the Tower of London; and
  - enhancing the north-south walking route between Tower Hill and Aldgate along Vine Street.
5. Enhancing the public realm and open spaces by identifying opportunities for urban greening schemes, congestion and pollution reduction measures, particularly in the vicinity of The Aldgate School and Middlesex Street and Mansell Street Estates.
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### **Reason for the policy**

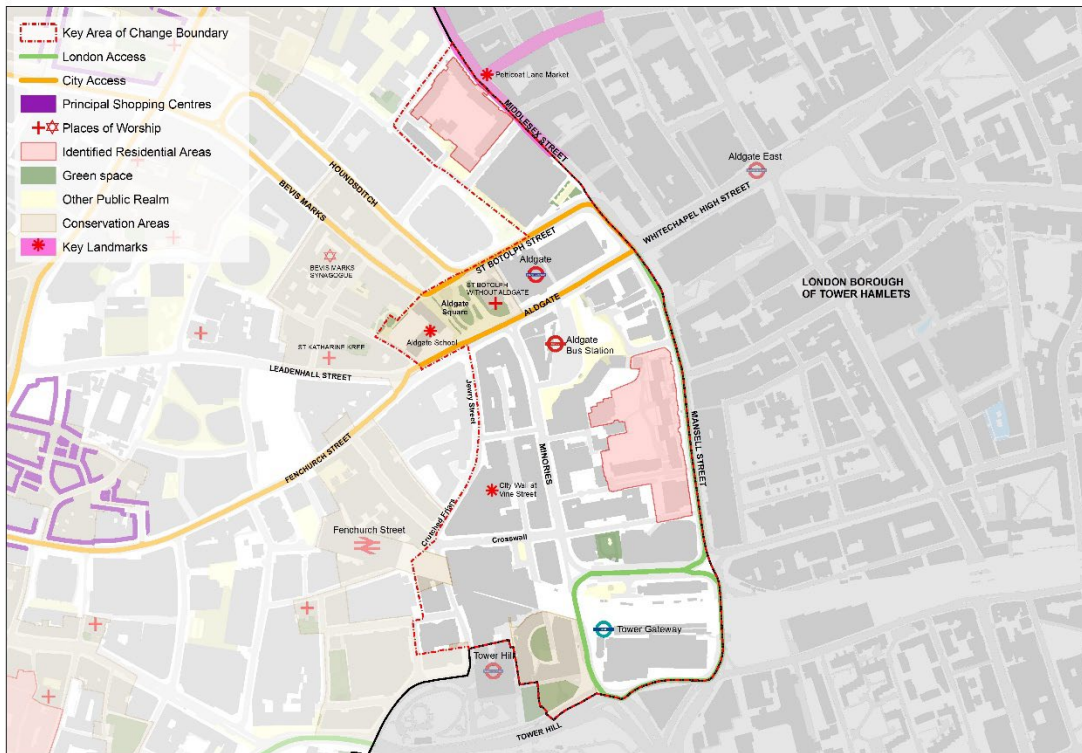
- 14.5.0 The Aldgate, Tower and Portsoken area is positioned in the east of the City the southern edge of the area is adjacent to the Tower of London.
- 14.5.1 The area contains a culturally diverse local population and a varied mix of uses, including offices, the Aldgate Primary School, Mansell and Middlesex Street housing estates and other housing, part of Petticoat Lane market, and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.
- 14.5.2 While there have been significant improvements, most notably the removal of the Aldgate gyratory and the creation of Aldgate Square, the Aldgate, Tower and Portsoken area contains major through routes and parts of the area still suffer with associated congestion and poor air quality. The townscape around Tower Gateway is particularly affected by severance issues because of the road and rail networks, and there is currently little to entice visitors going to the Tower of London to explore this part of the City more widely. Tower Gateway lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.
- 14.5.3 Identifying this area as a Key Area of Change will assist in guiding further enhancement of the area during the lifetime of this Plan. There is likely to be further commercial development, especially through the refurbishment or redevelopment of older buildings. The area will also experience increased tourism activity, in line with the continued increase in tourist numbers in London as a whole.
- 14.5.4 The area includes places where there are lower levels of income, employment and education, skills and training than others in the City. The regeneration potential of the Mansell Street Estate the potential to provide

improved housing for tenants, a more attractive environment, and increased housing in the area overall. Regeneration would require the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential environment at high densities and reducing residential exposure to air and noise pollution.

- 14.5.5 Development in the Aldgate, Tower and Portsoken area should enhance its appearance and vibrancy and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities.

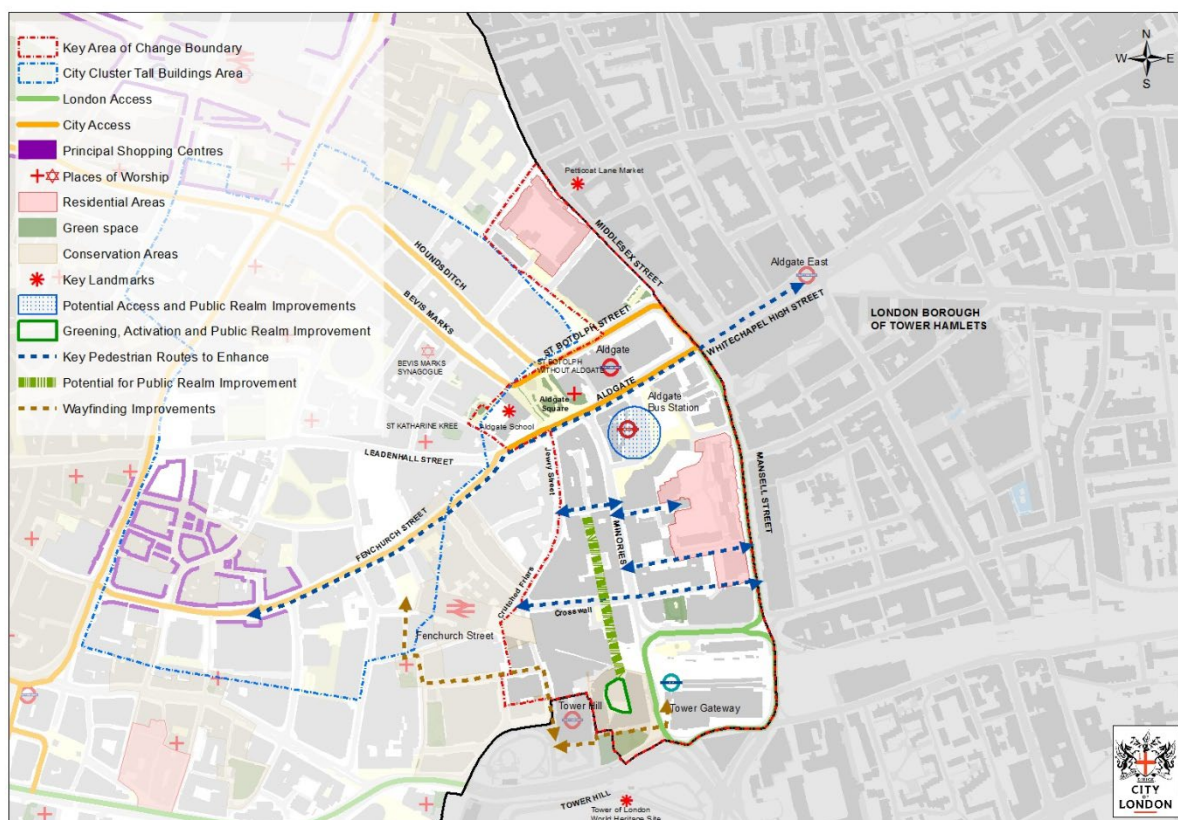
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**Figure 25: Aldgate, Tower and Portsoken existing conditions**



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**Figure 26: Aldgate, Tower and Portsoken Spatial Priorities**



## 14.6 Strategic Policy S21: City Cluster

The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, including through the construction of new tall buildings, together with complementary land uses, transport, public realm and security enhancements, by;

1. Increasing the provision of attractive world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers;
2. Encouraging complementary uses including leisure, culture and retail to support the primary office function in this area and providing active frontages at ground level.
3. Transforming Leadenhall Market into a seven day-week vibrant destination by encouraging culture, retail, food & beverage and other complementary uses, while preserving and enhancing its historic character and appearance.
4. Requiring the provision of new and improved open spaces at ground level, free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.
5. Delivering tall buildings on appropriate sites in line with Policy S12 (Tall buildings) ensuring they positively contribute to the City's skyline, preserving heritage assets and their settings, taking account of the effect on the London skyline and on protected views;
6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map). Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced.
7. Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
8. Enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and prioritising pedestrian movement in key streets such as St Mary Axe, Leadenhall Street and Lime Street; and creating new pedestrian routes through – and improving the accessibility of – Leadenhall Market.
9. Improving north-south connectivity for walking, wheeling and cycling through Gracechurch Street and Bishopsgate and east-west connectivity from Aldgate in the east to Bank in the west;

10. Delivering a high quality public realm, maintaining the quality of the microclimate and increasing urban greening;
  11. Activating streets, spaces and public realm at the ground floor and improving wayfinding through the streets and alleys.
  12. Improving walking and cycling into and through the Cluster. Pedestrian movement should be given priority through re-allocation of road space on key routes during daytime.
  13. Ensuring the provision of high quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
  14. Ensuring an area wide approach is taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high quality public realm and environment that reflects the status of the area;
  15. Introducing new approaches to freight, construction logistics and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth.
- 

### **Reason for the policy**

- 14.6.0 Tall buildings are an established defining feature of the City Cluster. This area is designated as an area appropriate in principle for tall building development. Detailed sensitivity analysis and three-dimensional modelling shows that there is potential for further tall building development. Market demand for new office space in this area has remained high and future capacity projections indicate that a large proportion of the office development pipeline is within the City Cluster and it is expected to accommodate a significant part of the City's future office space growth, alongside other compatible land uses.
- 14.6.1 The planned intensification of development in a relatively small geographic area will inevitably lead to a significant increase in footfall and put more pressure on public transport, streets, open spaces and services. The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line has significantly improved public transport access into the Cluster, with Bishopsgate being a key pedestrian route into and through the area. This concentration of activity will require better walking and cycling routes, enhanced public realm, and specialised approaches to freight and servicing, including the use of consolidation. To assist delivery of transformational projects in the Cluster, the City Corporation will continue to work with key stakeholders in the area, including the EC BID.
- 14.6.2 Office development within the City Cluster will be expected to deliver flexible floorspace to meet the needs of a range of occupiers and ensure the City's

stock is resilient and ready to respond to changes in the market. While all forms of development should be of high quality design, tall buildings have an impact on the wider London skyline. It is important that they create a coherent Cluster form and enhance the overall appearance of the Cluster on the skyline, while also having a successful relationship with the space around them at ground level and with particular regard to the Tower of London World Heritage Site, conservation areas and listed buildings. The City Corporation will use 3D modelling of the Cluster to guide future development and assess tall building proposals.

- 14.6.3 The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including the Grade I Listed Bevis Marks Synagogue, the oldest Synagogue in continued use in Great Britain. It is recognised that the Synagogue and its immediate setting are within the heart of an ever-changing world city and that there is pressure on sites for growth in the City Cluster. The Synagogue's immediate setting forms an intrinsic part of its significance and the broad scale and heights of buildings in the immediate setting of the Synagogue contribute to its significance. Significant changes to these buildings could potentially affect the setting and therefore significance of the Synagogue.
- 14.6.4 Leadenhall Market, the Grade II\* listed Principal Shopping Centre located in the heart of the City Cluster, has a long history of commerce and attracts visitors as a result of its location and architecture. Opportunities should be taken to reinvigorate Leadenhall Market into a seven days-a-week vibrant retail and cultural destination, all while celebrating its unique location and relevance to the history of London.
- 14.6.5 The intensification of development will have environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of pavement and public open space around the building, to ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.
- 14.6.6 Area-wide security measures will be implemented, including the Anti-Terrorism Traffic Regulation Order, to reduce the risks associated with high-profile buildings and increasingly crowded streets. Developers will be required to contribute towards the design and implementation of area-wide security through s106 planning obligations proportionate to the scale of the development. Area-wide approaches to servicing and deliveries will be promoted, for instance the use of physical and/or virtual consolidation measures.

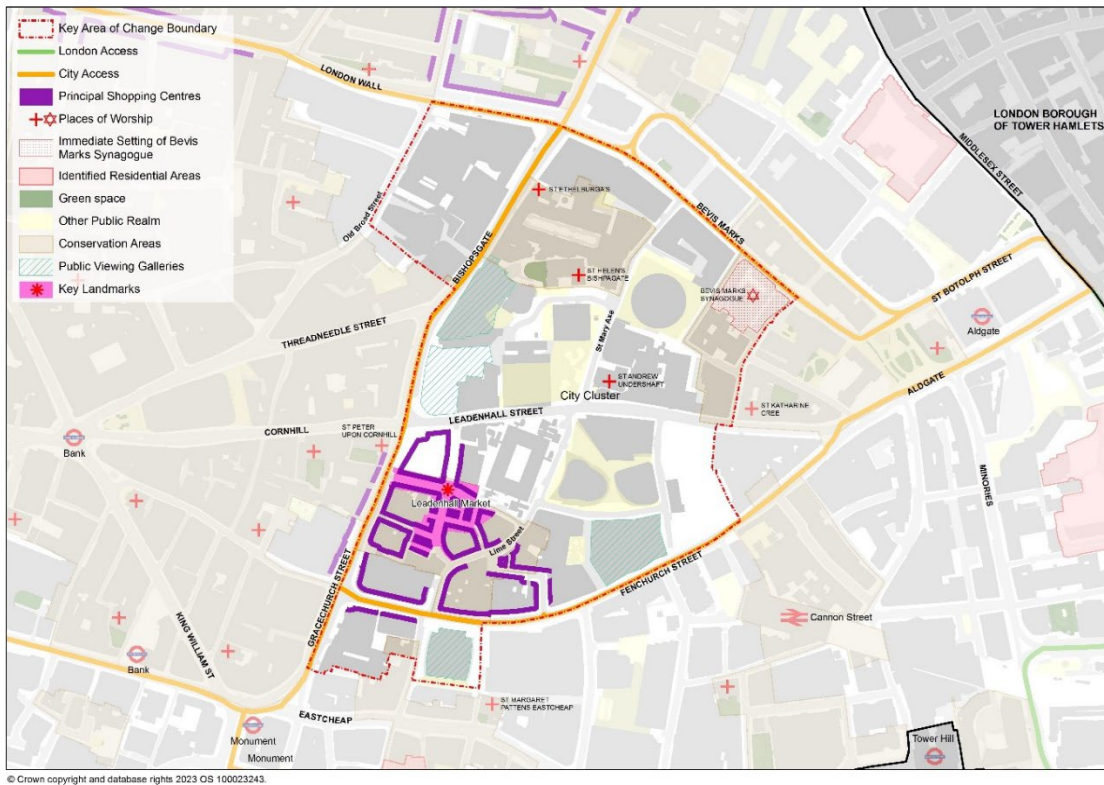


Figure 27: City Cluster existing conditions

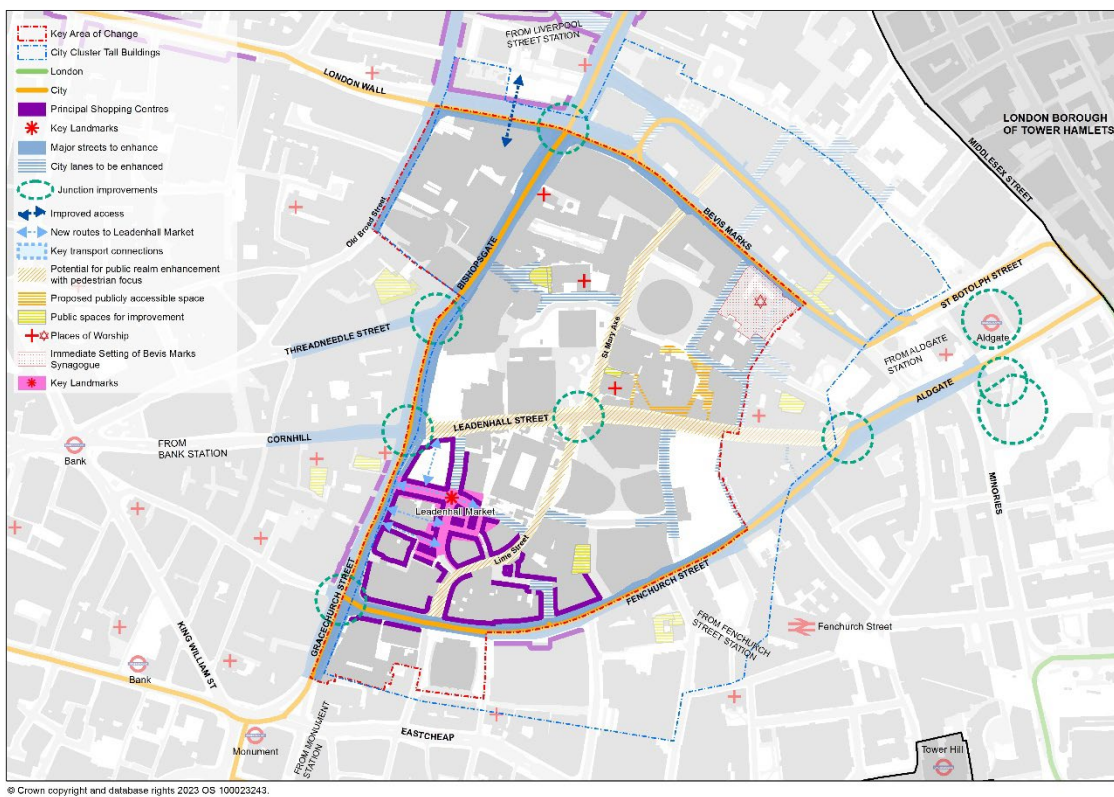


Figure 28: City Cluster Spatial Priorities

## 14.7 Strategic Policy S22: Fleet Street and Ludgate

The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by:

1. Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.
2. Developing new court facilities and City of London Police station, having regard to the impact of the development on the Fleet Street Conservation Area and heritage assets and the need to ensure security of the buildings for court and police use.
3. Continuing to protect existing office use in the area, whilst encouraging office-led redevelopments including for creative, start-up and SME businesses, with a mix of complementary retail, leisure and cultural uses which enhance the area's rich heritage and culture.
4. Seeking opportunities to provide an enhanced cultural offer in the area, informed by its rich history and connections to the legal, publishing and newspaper industries, as well as opportunities to better reveal the area's heritage.
5. Allowing tall building development on appropriate sites within the defined tall building area identified on the Policies Map.
6. Providing flexible spaces and complementary uses in appropriate locations.
7. Directing further residential development to appropriate sites off principal streets to reinforce existing residential clusters, ensuring a high quality of residential amenity. Student housing may be appropriate on suitable sites.
8. Retaining retail provision within the Fleet Street PSC and encouraging greater diversity of retail, culture and leisure and the extension of retail, leisure and cultural activity into the evening and weekends, and promote pop-up and meanwhile uses in suitable premises and sites.
9. Enhancing the public realm and open spaces by:
  - improving and increasing the capacity and accessibility of pavements along Fleet Street and Ludgate Hill, junction improvements at Ludgate Circus and more spaces for seating in the area;
  - enhancing the courts and alleyways that lead off Fleet Street and Ludgate Hill and churchyards that are located in the area, helping to better reveal them through sensitive wayfinding, and seeking opportunities to improve safety through enhanced lighting and activation;

- enhancing the immediate setting of St. Paul’s Cathedral through high quality development and public realm enhancements; and
- delivering additional greening on streets and open spaces and encouraging the greening of buildings, where compatible with heritage considerations.

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## Reason for the policy

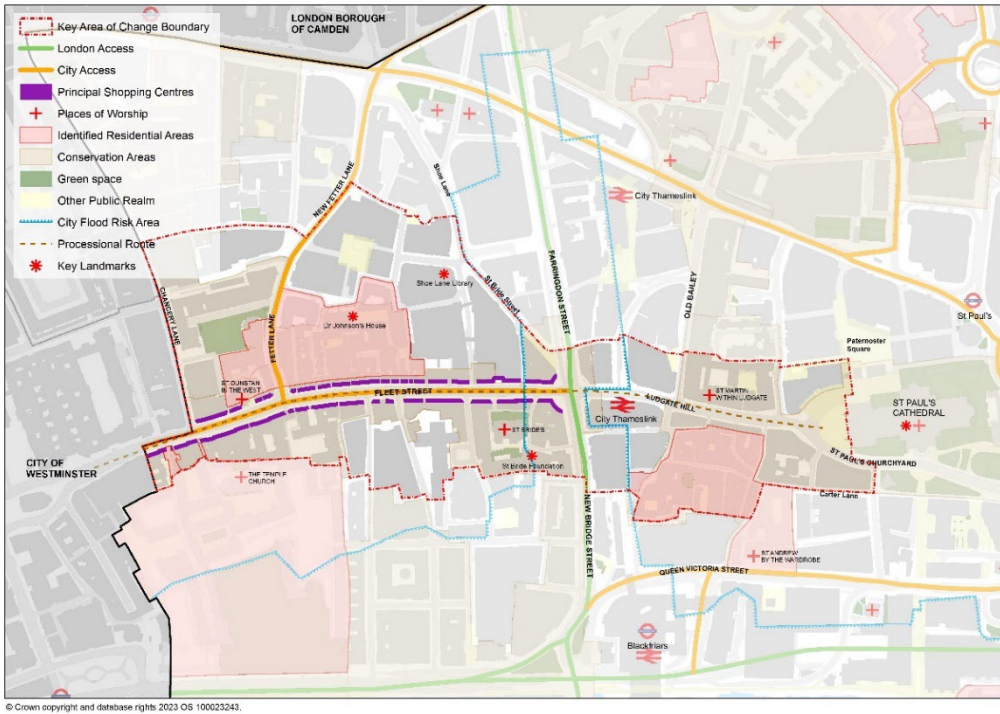
- 14.7.0 Fleet Street is an iconic location with a name synonymous with the UK newspaper and publishing industry. However, the newspapers that occupied Fleet Street have moved out, and the area is home to a broad range of commercial office occupiers.
- 14.7.1 The area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster, and this will be enhanced with the delivery of the new court building and police facilities at Salisbury Square, which is being developed by the City Corporation in partnership with the Ministry of Justice to provide a flagship court facility for London to tackle cybercrime, fraud and economic crime. The area is identified in the London Plan as a CAZ Legal Cluster and its important and varied legal functions will be supported and enhanced through this City Plan.
- 14.7.2 The Fleet Street area has a strong cultural offer with attractions ranging from Dr Johnson’s House to the St Bride’s Institute, the Bridewell Theatre and the historic churches of St Brides, St Dunstan’s in the West and Temple Church. These attractions help draw visitors to the area, which support the PSC, and opportunities should be sought to enrich the contribution these buildings and organisations make to the life of the Fleet Street area.
- 14.7.3 Ludgate Circus is a major junction between Fleet Street, Ludgate Hill and Farringdon Street. The western side lies within the Fleet Street PSC, Ludgate Hill forms the principal approach to St Paul’s Cathedral and a key element of the royal and state processional route. Major commercial development at Old Bailey has enhanced the office and retail offer on this street and further hotel development could support the City’s growing visitor economy.
- 14.7.4 The Key Area of Change contains a mix of large modern office developments and smaller scale historic buildings on small plots more suitable for SME use. The City-wide presumption in favour of protecting office uses will continue to apply and the area’s commercial office focus will remain. A particular focus for future office development will be the identified tall building area, within which tall buildings will be permitted on appropriate sites, having regard to heritage and views constraints.
- 14.7.5 There may be potential for partnership working between occupiers in the area to deliver improvements and more flexible use of some buildings whilst retaining a predominance of commercial uses which complement the City’s business focus. To assist with the development of a coherent vision for the

area, the City Corporation will support the work of the Fleet Street Quarter BID. The BID is keen to explore ways in which Fleet Street can act as a vibrant spine for the area, while improving its links with other parts of the City including the area up to High Holborn and access to the riverside.

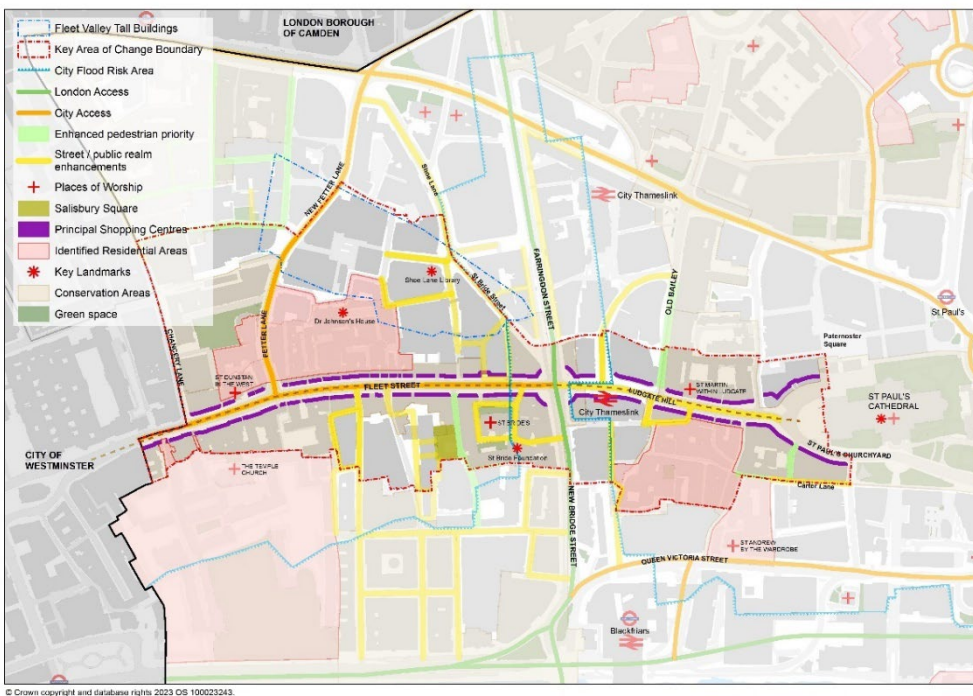
- 14.7.6 The area contains an existing residential cluster to the north of Fleet Street, with a number of upper floors of buildings on Fleet Street itself converted to residential in recent years. South of Ludgate Hill is the established residential and commercial area of Carter Lane. Fleet Street, Ludgate Hill and Carter Lane suffer noise from commercial and retail activities, while traffic contributes to poor air quality along parts of Fleet Street and Ludgate Hill. To ensure a high quality of residential amenity, new residential development in this area will be directed to sites away from principal streets, so that the potential for noise disturbance and exposure to poor air quality can be minimised.
- 14.7.7 The PSC is an important aspect of Fleet Street that provides vibrancy along its length; however the PSC is under-performing and has the potential to diversify. To strengthen the PSC, it should continue to provide comparison and convenience shopping, but also look to extend its retail offer into the evenings and weekends and provide a broader range of retail and leisure uses. Ludgate Hill provides a key route between Fleet Street and Cheapside PSC and the extension of the Fleet Street PSC is appropriate along this route.
- 14.7.8 The key streets within the area offer a poor public realm, being heavily trafficked with narrow footways that are congested particularly during peak hours and lunch times. There is limited greenery along Fleet Street, Ludgate Circus and Ludgate Hill. Additional planting will need to consider the impact on the established character of the area and on key views of St Paul's Cathedral along the processional route. There is scope to enhance the public realm and to prioritise pedestrians, including through the widening of pavements. Improvements to the public realm will deliver benefits to the area as well as improve air quality and provide more quiet areas in the network of courts and alleyways behind Fleet Street and Ludgate Hill. St Bride's Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement. Other parts of the area where the public realm and street environment offer scope for improvement include Carter Lane and the Whitefriars area to the south of Salisbury Square.
- 14.7.9 The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960s. The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is



potential for significant townscape enhancements and de-cluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral to enhance the setting of this iconic building.



**Figure 29: Fleet Street and Ludgate existing conditions**



**Figure 30: Fleet Street and Ludgate Spatial Priorities**



## 14.8 Strategic Policy S23: Smithfield and Barbican

The City Corporation will improve the Smithfield and Barbican area by:

1. encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements;
2. ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;
3. ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;
4. supporting and enabling residential development in appropriate locations;
5. identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;
6. making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;
7. seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;
8. requiring improvements to pedestrian and cycle routes for all within and through the north of the City;
9. supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;
10. supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;
11. encouraging a diverse leisure, retail, food and beverage offer, particularly along routes between the London Museum and the Barbican;
12. encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and
13. enhancing the special character of the area through sensitive change.

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### Reason for the policy

14.8.0 The Smithfield and Barbican Key Area of Change is a vibrant, mixed use area that contains:

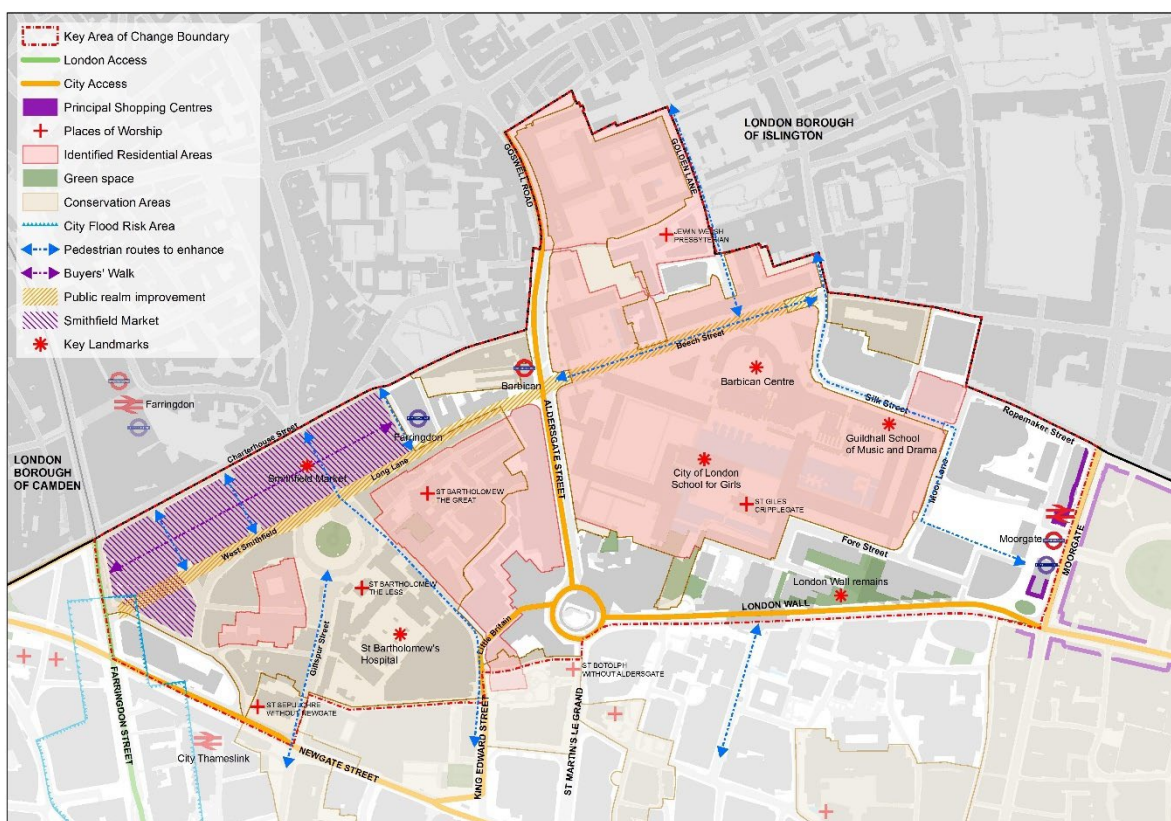
- The highest concentration of residential units in the City, including the Barbican and Golden Lane estates and Smithfield (principally Barts Square);
- A cultural quarter focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic cultural area, which will be enhanced with the relocation and reopening of the London Museum;
- St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre;
- Smithfield Market, London's major wholesale meat market, which is expected to relocate in the coming years;
- A mixed office stock and occupier profile, ranging from large corporate headquarters to buildings suitable for SMEs, creative enterprises and start-ups;
- Many heritage assets of national significance including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, and gardens and spaces that enhance its special character.

- 14.8.1 This part of the City will undergo significant change and development over the life of the Local Plan with the relocation of the London Museum to Smithfield and the current operations of Smithfield Market.
- 14.8.2 A Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by the City Corporation on 18 July 2023.
- 14.8.3 The City Corporation will enable a range of cultural and artistic activities throughout the area. Together these changes will attract a substantial increase in visitors to this part of the City and enhance the area's attractiveness for businesses, residents and visitors. The opening of the Elizabeth Line, linking to national rail and tube lines, has made this area one of the most accessible locations by public transport in the country.
- 14.8.4 The Barbican complex contains an internationally recognised cultural area and the City's largest concentration of residential units. Barbican Listed Building Management Guidelines have been produced, which seek to protect the special architectural and historic interest of the buildings and their setting.
- 14.8.5 Delivery of this policy will be supported by implementation of public realm enhancement and transportation schemes and greater activation of streets, providing improved amenity, design and movement, for the benefit of workers, residents and visitors. The design of new buildings and spaces should provide greater pedestrian permeability, ensuring that the area is able to accommodate and manage increased volumes of people and activities. A particular concern in this area is the need to improve air quality to protect the health of the public, including in particular the comparatively large resident population and hospital patients.

- 14.8.6 The Citigen plant, located immediately north of the City on Charterhouse Street in Islington, is providing heating and cooling to buildings within the City. Subject to future progress on decarbonisation, Citigen offers the potential of low carbon heating and cooling to buildings in this part of the City and new development should, where feasible, be designed to enable connection to the network.
- 14.8.7 To deliver its ambitions for the Smithfield and Barbican Area, the City Corporation is aiming to create a distinctive look and feel for the area, which allows for the provision of art installations and activity in the public realm in appropriate locations.
- 14.8.8 Creative industries make a significant contribution to the City's economy, particularly within the Smithfield and Barbican area. Significant social and economic value can be derived from the growth of creative enterprises and the City Corporation will continue to encourage and support their growth within the Key Area of Change, including through the delivery of meanwhile uses in vacant and under-used premises.



**Figure 31: Smithfield and Barbican existing conditions**



**Figure 32: Smithfield and Barbican Spatial Priorities**

## 14.9 Strategic Policy S24: Smithfield

The City Corporation will protect and enhance the distinctive mixed-use and historic character of Smithfield by:

14. supporting the continued presence of St. Bartholomew's Hospital;
15. supporting the continued presence of Smithfield Market in the short to medium term;
16. encouraging the future sensitive re-use of the Smithfield Market buildings, should the market relocate, requiring a world class design solution that delivers a mix of uses that celebrate and are appropriate to its sensitive heritage character, and that provide inclusive public access to the buildings;
17. supporting the relocation of the Museum of London to Smithfield;
18. further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses;
19. managing the particular challenges which result from the late evening, 7 day a week character of the area;

20. resisting residential development adjacent to the current market site or future Museum of London in order to minimise potential adverse impacts on residential amenity;
  21. promoting a retail and leisure economy that complements and contributes to the changing uses in the area and supports the establishment of Smithfield as a leisure destination;
  22. ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents; and
  23. providing for, and supporting, improved pedestrian permeability and the creation of new and enhanced public realm across the area to accommodate cultural activity and increased pedestrian flows arising from the Elizabeth Line and potential new uses in the existing market buildings.
- 

### **Reason for the policy**

- 14.9.0 The relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line and encouragement of cultural and visitor activities, will result in a significant increase in pedestrian and visitor numbers in this Key Area of Change, which will place further pressure on the public realm and on important local open spaces such as Smithfield Rotunda Garden, which is Grade II listed. Improvements to the public realm will be required to ensure that increased movement can be accommodated. At the same time, it is important that new activities do not adversely affect the amenity of existing business and residents, the continued operation of St Bartholomew's Hospital or impact on the area's historic significance and mixed-use character. The wider area has a mix of uses, including the hospital, Livery Halls, open spaces, pubs, shops and restaurants, offices and residential use.
- 14.9.1 The City Corporation has carried out a strategic review of its three wholesale markets, Smithfield, Billingsgate and New Spitalfields. A decision has been taken, to co-locate the wholesale markets on a single site. As a result, it is expected that Smithfield Market will move from its current location in the City during the Plan period. The City Plan therefore continues to protect the operation of the Market in Smithfield, but also provides guidance requiring future potential uses of the market buildings to maintain the historic character of the existing Grade II\* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for cultural and leisure activity and is fully inclusive whilst protecting local amenity. Inclusive, welcoming public access to the buildings of Smithfield Market will be an important component of future uses and designs should consider how these spaces can be better revealed, with routes through the buildings including Buyer's Walk, the central spine running through the buildings.

## 14.10 Strategic Policy S25: Liverpool Street

The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by good public transport accessibility, the opening of the Elizabeth Line, restoration of Finsbury Circus and the redevelopment and refurbishment of Broadgate by:

1. Accommodating the increased footfall by maintaining and enhancing walking routes within, to and from the area, including routes to the City Cluster;
2. Providing active frontages at the ground floor level to animate and add vibrancy to the area;
3. Providing a welcoming visitor experience with improved wayfinding and signposting that reflects the area's position as a key gateway to the City;
4. Encouraging the development of flexible office space to meet the needs of future offices occupiers and potential start-ups, allowing for business growth in a variety of sectors;
5. Encouraging development that provides opportunities for collaborative working between businesses in this area, Tech City, the creative sector and educational institutions to create an attractive and vibrant business eco-system
6. Supporting retail development in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends, diversifying the retail and leisure offer and creating a shopping and leisure destination to draw a diverse range of audiences;
7. Enhancing the public realm and walking routes to Petticoat Lane Market, working in partnership with the London Borough of Tower Hamlets, and the links to Whitecross Street and Spitalfields markets;
8. Delivering a high quality public realm with additional publicly accessible open space and increased greenery alongside biodiversity improvements;
9. Improving pedestrian routes in and around the bus station and enhancing the user experience through provision of seating, legible wayfinding and ease of access;
10. Improving the overall user experience and supporting improvements to the accessibility and capacity of Liverpool Street Station, including enhancing step free access and improving entry points; and



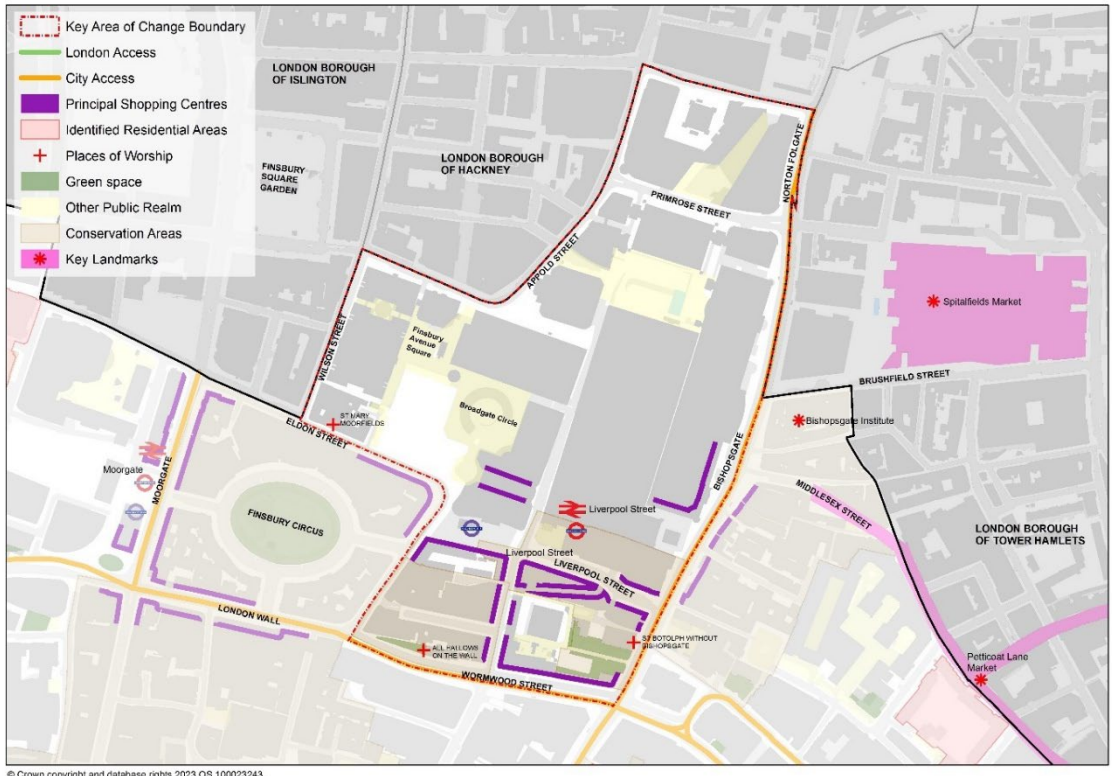
11. Improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including Tech City and the City Cluster.

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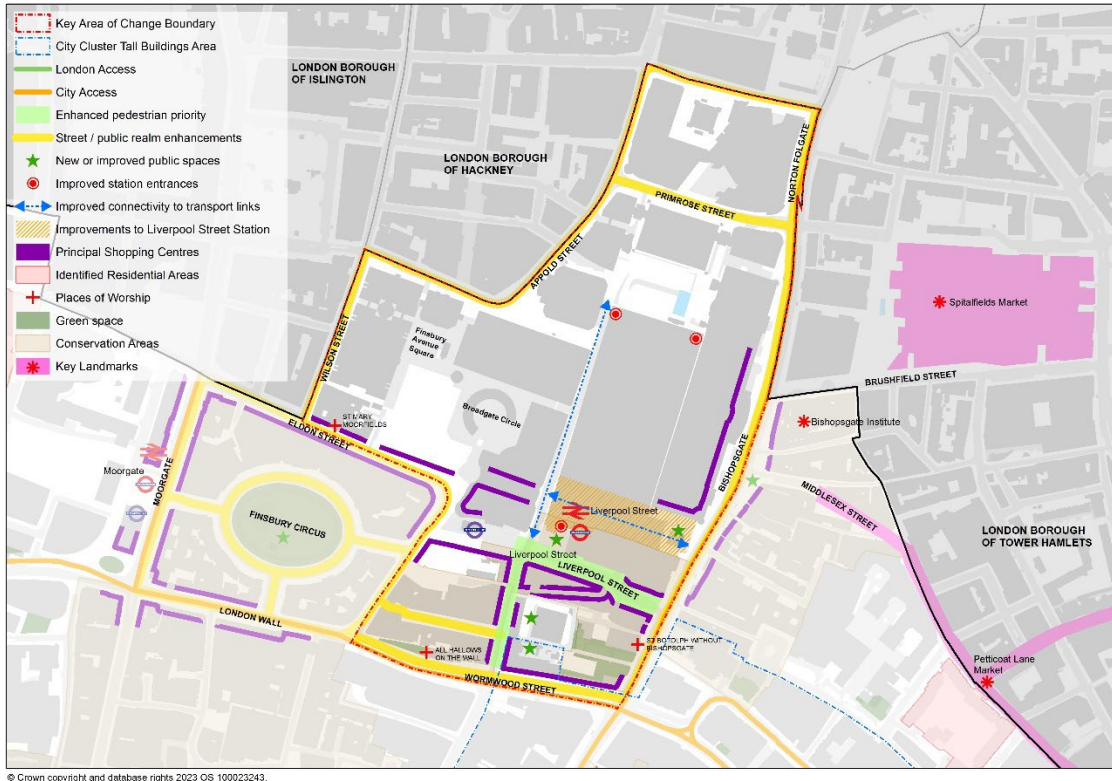
**Reason for the policy**

- 14.10.0 The Liverpool Street area is a dynamic part of the City of London, and home to one of London's busiest transport hubs and increasingly a destination for leisure as well as work. The area is undergoing significant transformation. This has happened through the recent arrival of the Elizabeth Line; the large-scale redevelopment and refurbishment of Broadgate and associated public realm improvements; and the development of several new offices, and retail and leisure facilities in the Liverpool Street area and in the nearby City Cluster that are either under construction or planned. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. Broadgate is currently developing a more outward looking character and this is expected to continue, alongside further improvements to permeability.
- 14.10.1 Where suitable funding is available, the City Corporation will support such change through delivery of world class public realm and improvement to streets and pedestrian routes, including additional pedestrian priority and new pedestrian routes to maximise permeability, where appropriate. The Transport Strategy indicates that the area around Moorgate and Liverpool Street stations will be prioritised for improvements, together with the routes between these stations and key destinations such as the City Cluster. Where feasible, additional urban greening and the creation of green urban spaces will be encouraged.
- 14.10.2 The City Corporation will work with relevant partners including TfL, Network Rail, train operators and landowners to promote improvements to the accessibility of facilities provided in Liverpool Street Station and the surrounding area. This may include enhancing step free access, improving entry points and reviewing bus interchange, together with any potential future improvements to operational capacity at the station.
- 14.10.3 Alongside these changes, encouragement will be given to the provision of space suitable for incubators, start-ups, technology-based companies and creative industries, including the provision of flexible accommodation suitable for these sectors and growing businesses. This will reinforce established links between the area and the Old Street/Shoreditch/Spitalfields Tech City area, and will exploit the opportunities to enhance the creative ecology of this part of the City. The area also plays an important role supporting adjacent night-time economy areas at Shoreditch and Brick Lane, including providing public transport access via the night tube.





**Figure 33: Liverpool Street existing conditions**



**Figure 34: Liverpool Street Spatial Priorities**

# 15. Implementation

## Planning Contributions

### Community Infrastructure Levy (CIL)

15.1.0 The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) set out the legislative and regulatory basis for the CIL. They provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the City Plan. CIL is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

### Planning Obligations

15.1.1 CIL Regulations indicate that planning obligations may only constitute a reason for granting permission if the planning obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

15.1.2 Planning obligations are legal agreements linked to planning permissions that regulate the way a development is undertaken, and they are used where it is not possible to regulate the permission by means of a condition. They may be in the form of in-kind benefits or a financial contribution and may be used to prescribe the nature of a development, compensate for loss or damage created by a development, or mitigate the impacts associated with the development. The level of any obligation is subject to consideration of its impact on the viability of the development proposed.

## 15.2 Strategic Policy S26: Planning Contributions

The City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development:

1. Requiring contributions through the Community Infrastructure Levy to:
  - assist in the delivery of the infrastructure necessary to support implementation of the City Plan and the City's Transport Strategy; and
  - contribute towards the costs of Crossrail, or other strategic infrastructure, in accordance with the provisions of the Mayor of London Community Infrastructure Levy 2.

2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
    - site specific mitigation meeting statutory tests;
    - affordable housing;
    - training, skills and job brokerage;
    - carbon offsetting;
    - cultural provision;
    - Highways and public realm enhancements including commuted sums for maintenance;
    - local procurement in the City and neighbouring boroughs; and
    - measures to enhance area-wide security, where appropriate.
  3. Use of the Vacant Building Credit is not considered to be appropriate in the City of London.
- 

### **Reason for the policy**

15.2.0 The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL) to help local infrastructure keep pace with the demands of development and attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to ensure proposals are acceptable.

### **How the policy works**

15.2.1 The City Corporation has adopted a CIL Charging Schedule and publishes an annual Infrastructure Funding Statement setting out the types of infrastructure or infrastructure projects that may be funded in part or in whole by CIL.

15.2.2 In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security measures in the City Cluster, in line with the policies set out in this Plan. Planning obligations will also be negotiated to deliver affordable housing, the provision of training and skills programmes, carbon offsetting and, where appropriate, contributions towards cultural provision. Specific requirements are set out in other policies within this Plan, particularly Policies S1, S3, VT1 and DE1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will

be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

15.2.3 Where required, the City Corporation will seek, via s106 planning obligations, Section 278 Agreements with developers to ensure that highway works necessary to make a development acceptable are funded by the developer and implemented by the highway authority.

15.2.4 Further detail on planning obligations is set out in the Planning Obligations SPD and in the s106 Standard Template which is published on the City Corporation's website.

15.2.5 The Vacant Building Credit is set out in national planning policy and is intended to provide an incentive to bring forward brownfield sites for development. The high cost of land in the City of London, together with high levels of demand for commercial and residential development, mean that additional incentives are not required to encourage brownfield sites to come forward for development. The use of Vacant Building Credit is therefore not considered to be appropriate within the City of London.

### **Crossrail**

15.2.6 The Mayor of London Community Infrastructure Levy 2 (CIL2) was implemented from 1 April 2019. It requires development across London to make a contribution towards the funding of Crossrail 1 and Crossrail 2. The Mayor's CIL2 sets a charging rate for all development in London, with a higher charging rate for office, retail and hotel development in Central London, including in the City of London. The Mayor's CIL2 is payable in addition to the City of London CIL.

## **15.3 Policy PC1: Viability Assessments**

1. Development proposals must take full account of the policy requirements set out in this Plan and the London Plan, including financial and other requirements under the Mayoral and City of London Community Infrastructure Levy and s106 planning obligations.
2. Exceptionally, even where policy requirements have been taken into account, applicants may consider that these requirements cannot be delivered in full without adversely affecting the overall viability of a development. In these circumstances, proposals must be supported by a scheme specific viability assessment.
3. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a site and/or building will not be a relevant justification for not meeting Development Plan requirements.

4. Viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. If an assessment is redacted, an executive summary will be made public.
  5. The City Corporation will seek independent verification of submitted viability assessments, with the cost of verification being met by the applicant.
  6. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.
- 

### **Reason for the policy**

15.3.0 Delivery of the City Plan and the London Plan requires developers to make contributions towards infrastructure and affordable housing provision through the CIL and s106 planning obligations. Developers must take into account the full cost of meeting development plan requirements when purchasing sites or buildings and in the design of schemes. A whole plan viability assessment has been undertaken in the preparation of this Plan demonstrating that implementation of the policies should not adversely impact on the viability of development in the City of London. Exceptionally, there may be circumstances where a developer considers that meeting development plan requirements in full cannot be delivered without adversely impacting on the viability of a development. In such circumstances, the City Corporation will require a site-specific viability assessment to be submitted in support of the proposed lower level of contributions.

### **How the policy works**

15.3.1 Where viability assessments are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability assessments set out in national Planning Practice Guidance. In particular, assessments must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the City Plan and the London Plan. The actual price paid for land will not be a relevant justification for failing to meet the policies in the development plan.

15.3.2 The City Corporation will review viability assessments against the requirements in the City Plan and London Plan and, where necessary, will seek independent verification of submitted assessments from suitably qualified consultants who have experience of the development market in central London. Verification of viability assessments will consider whether appropriate costs, values and risk rates have been utilised which reflect the

ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.

- 15.3.3 The City Corporation will make all viability assessments submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability assessment should remain confidential in whole or in part, they should provide justification to the City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability assessment public. Where the City Corporation considers that an assessment should remain confidential in whole, or in part, it will keep the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.
- 15.3.4 Where the City Corporation agrees that a development cannot meet the full policy requirements for CIL and s106 planning obligations at the date of commencement, but that there are other policy considerations which would nevertheless justify approval of the scheme despite this non-compliance, the Corporation will normally require that a review mechanism be included within any s106 planning obligation, with a review of the viability information required at a later stage in the development, or upon occupation. In determining the appropriate mechanism, the City Corporation will have regard to national Planning Practice Guidance, the London Plan and the Mayor of London's Affordable Housing and Viability SPG. Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.
- 15.3.5 Policy S3 Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.

## 15.4 Monitoring

- 15.4.0 The City Plan was prepared in the context of the most up to date information available. A range of projections and potential future scenarios were considered for each policy area. However, circumstances may change and monitoring of City Plan policies is essential to determine the extent to which the policies are delivering the City Plan vision, strategic objectives and spatial strategy.
- 15.4.1 The City Corporation will prepare and publish at least annually a range of City Plan monitoring reports, which measure and evaluate progress towards meeting the Plan objectives across a range of policy areas. Policies monitored will include offices; housing; hotels; tall buildings; protected views; sustainability; waste; open spaces and green infrastructure. The City Corporation will also periodically (annually) review progress against the programme of infrastructure delivery set out in the Infrastructure Delivery Plan.
- 15.4.2 The City Corporation is required to review the City Plan at least every five years from the date of adoption to determine whether it needs to be updated. Data and trends identified in the City Plan monitoring reports may indicate the need for an earlier partial or full review of the adopted Plan.
- 15.4.3 As mentioned in the introduction to this Plan, the Government is pursuing a planning reform agenda which includes proposals to radically change the format and content of local plans. These reforms, if enacted, will be a key factor in determining the timing and scope of the next review of the City of London's City Plan.



# Appendices

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# City Plan 2040 Appendix 1

## Development of the City Plan 2040

### 1. Why is the City Corporation preparing a City Plan?

The City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should develop.

### 2. The stages of preparing the City Plan

- The first stage of the process was the Issues and Options stage in 2016, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered in a new local plan to address them.
- The second stage, the draft City Plan 2036, was a consultation on a full draft local plan during later 2018 and early 2019.
- Responses from these two consultations, along with evidence, informed a proposed submission version of the City Plan 2036, which was consulted on between March and May 2021. As a result of comments made during this consultation, the City Corporation decided to undertake further technical work and evidence to address consultation responses and changing economic, social and environmental trends.
- Informal public engagement on key issues and the Key Areas of Change was undertaken during the summer of 2023.
- The City Corporation has used this technical work, public engagement and updated evidence to prepare the City Plan 2040, which is a revised submission version. The timeframe for the new City Plan has been amended to ensure a 15 year timeframe for the plan.

### 3. Next Steps

Following consultation on the City Plan 2040, it will be submitted to the Secretary of State for Levelling Up, Housing and Communities. The Secretary of State will then appoint an independent Planning Inspector to examine the submitted Plan, which is expected to be adopted in 2025.

# Glossary

## Explanation of terms used in the City of London City Plan.

\* Terms explained elsewhere in the glossary are marked with an asterisk.

### **Accelerator office space**

An office location which provides mentorship, advice, and resources to help start-ups succeed and grow rapidly, normally let on a short-term basis.

### **Active frontage**

Fronts of buildings that facilitate visual and physical permeability.

### **Active frontage use**

A definition used in this plan for those uses that fall within use classes E(a)-(e), where they have an active frontage. These use classes include shops, cafes and restaurants, and services for use by the general public such as hairdressers, banks and building societies, shoe repair and dry cleaning, gyms, and health centres. Pubs and other community and cultural uses may also be active frontage uses, where they are frequented by members of the public.

### **ACV - Assets of Community Value**

A building or other land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future. ACVs must be approved by the local authority.

### **Affordable housing**

Affordable housing is defined primarily by affordability and not by tenure. It comprises 'social rented housing', 'affordable rented housing' and 'intermediate housing', provided to eligible households whose needs are not met by the market. Social rented housing is at rents no greater than target rents set by government for local authority, Registered Social Landlords\* (RSL) and cooperative tenants. Affordable rented housing has the same characteristics as social housing but is offered at up to 80% of local market rentals (including service charges, where applicable).

Intermediate housing is housing for sale and rent where costs are above target rents for social rented housing but are at least 20% below local market levels and are affordable by households on moderate incomes. Intermediate housing can include shared equity (shared ownership and equity loans), starter homes, discounted market sales housing and other sub-market rented and key worker provision.

### **Affordable workspace**

Workspace that is provided at rents maintained below the market rate for that space for a special social, cultural, or economic development purpose.

### **Agent of Change**

The principle that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.

### **Air Quality Impact Assessment**

An assessment of the impact of a development on the levels of certain pollutants in the local area, which could include: a description of baseline conditions and how these could change; relevant air quality concerns; the assessment methods to be adopted and any requirements around verification of modelling air quality; sensitive locations; the basis for assessing impact and determining the significance of an impact; construction phase impact; and/or acceptable mitigation measures.

### **Air Quality Neutral**

Assessment of air quality against benchmarks set by the Mayor of London through his Sustainable Design and Construction SPD 2014. Developments that do not exceed these benchmarks will be considered to avoid any increase in NOx and PM emissions across London as a whole and therefore be 'air quality neutral'.

### **Apart-hotel**

Accommodation for short or medium-term stays that generally provide more amenities for daily use (such as a small kitchenette) than standard hotel accommodation. They have a reception area where customers can access services without pre-booking and are available on a nightly basis without a deposit being required against damages.

### **BAP - Biodiversity Action Plan**

The Biodiversity Action Plan provides a framework to ensure all legislative requirements relating to the management of green spaces are taken into consideration at all times and both identifies and prioritises actions for biodiversity at a local level.

### **Biodiverse green roofs**

A biodiverse green roof should include a varied substrate depth, planted and or seeded with a wide range of wildflowers (sedums can be added). A biodiverse green roof should have a sufficient depth of between 80 - 150mm.

### **Biodiversity**

The variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

### **Biodiversity Net Gain (BNG)**

Biodiversity net gain is a statutory requirement which applies to new development. It is a way of making sure the habitat for wildlife on a site is in a better state after the development than it was before development.

### **BREEAM Sustainability Assessment**

The Building Research Establishment Environmental Assessment Method (BREEAM) is a sustainability assessment method that sets standards for the environmental performance of buildings through the design, specification, construction and operation phases and can be applied to new developments or refurbishment schemes. It focuses on sustainable value across range of categories: energy; land use and ecology; water; health and wellbeing; pollution; transport; materials; waste; management.

### **Build to Rent**

Homes built specifically for private renting rather than for sale which meet criteria set out in Policy H11 Build to Rent in the London Plan 2021.

### **Business Eco-System**

A network of organisations, including suppliers, distributors, customers, competitors and government agencies, involved in the delivery of a specific product or service.

### **Business Improvement District**

A defined area in which a levy is charged on all business rate payers in addition to the business rates to develop projects that will benefit businesses in the local area.

### **Cash in lieu / commuted sums**

Payments of money received from developers instead of the provision of affordable residential units on the development site in the City of London. The money is pooled and used by the City Corporation when opportunities to develop affordable housing arise.

### **CAZ - Central Activities Zone**

The area defined in the London Plan\* where planning policy promotes financial and business services, specialist retailing, tourist and cultural uses and activities. The City is wholly within the CAZ.

### **Changing Places toilets**

These meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide the right equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and carer, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.

### **Circular economy**

An economy which keeps resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.

### **City Flood Risk Area**

Area of the City which is susceptible to flooding from the river Thames, surface water or the sewer network.

### **CIL - Community Infrastructure Levy**

A statutory charge on new development used to contribute towards the funding of infrastructure provision. The City Corporation has prepared a CIL charging schedule that was implemented in July 2014.

### **City Plan**

Document setting out the statutory local plan, including the strategy, vision and policies and proposals for planning the City.

### **Comparison goods**

Comparison goods are those bought relatively infrequently, so consumers usually compare prices, features and quality before making a purchase. They may include items such as clothes, electrical items, household and leisure goods.

### **CAAC - Conservation Area Advisory Committee**

A consultative group set up to advise on planning applications and other proposals in the City's conservation areas.

### **Construction Logistics Plan**

A travel plan that aims to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the street network.

### **Creative enterprises / Creative industries**

Defined by the Department for Culture, Media and Sport\* as those industries which have their origin in individual creativity, skill and talent and which have a potential for

wealth and job creation through the generation and exploitation of intellectual property. They include architecture; advertising & marketing; crafts, product, graphic & fashion design; film, TV, radio and photography; IT, software & computer services; museums, galleries & libraries; music, performing & visual arts, and publishing.

### **Culturally significant object**

Objects which people identify and value and which reflect their evolving knowledge, culture, beliefs and traditions.

### **Culture and Vibrancy Plan**

A Culture and Vibrancy Plan is a flexible framework to support the successful incorporation of relevant, enriching and inclusive cultural, leisure and recreation components within a major development through a step by step process. It is prepared through the development process and the final detail, delivery and ongoing management secured through conditions and/or legal agreement.

### **Decentralised energy**

Energy that is generated close to the place where it is used, so that transmission of electricity, heat and other energy carriers are minimised.

### **Deconstruction**

The act of breaking down a building into components or dismantling - this allows for recycling of the resulting materials. Different to demolition which involves wrecking, destroying or tearing down completely.

### **DSP - Delivery and Servicing Plan**

A plan that shows how a development will proactively manage delivery and servicing arrangements.

### **DCMS - Department for Culture, Media and Sport**

The government department of state whose responsibilities include recreation, the arts and historic buildings.

### **DLUHC – Department for Levelling Up, Housing and Communities**

The government department of state whose responsibilities include town planning.

### **Design and Access Statement**

A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with.

### **Design Council**



Advisor to central and local government on good design.

### **Development Management**

The process by which the City Corporation (and, where appropriate, the Mayor of London and Secretary of State) determine applications for planning permission and related consents. Applications are decided in accordance with the development plan\* unless material considerations (including the NPPF\*) indicate otherwise.

### **Development Plan**

The statutory documents that together set out the planning policies for an area. In the City the development plan comprises the Mayor's London Plan\* together with the City's Local Plan\*.

### **DPD - Development Plan Document**

Statutory planning policy document whose preparation process includes public examination. There is one adopted DPD in the City: the Local Plan DPD\*.

### **Embodied carbon**

The total life cycle carbon used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

### **Freight consolidation**

Combining goods shipments into fewer deliveries to reduce the number of freight vehicles required to service a building. This can be achieved through the physical consolidation of goods at an off-site location and/or through methods such as preferred supplier schemes and common procurement strategies.

### **GLA - Greater London Authority**

The GLA comprises the Mayor of London\* (who has an executive role and makes decisions on behalf of the GLA) and a separately elected Assembly (a body of 25 elected Members which has a scrutiny role and is responsible for appointing GLA staff).

### **Green corridors**

Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access routes.

### **Green infrastructure**

A strategically planned, designed and managed network of green spaces and other features vital to the sustainability of any urban area. This includes (although not exclusively) trees, green roofs and walls, green corridors\*, and blue infrastructure such as water spaces and natural drainage features.

## **HRA - Habitats Regulations Assessment**

The purpose of the Habitats Regulations Assessment is to identify any aspects of an emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects are identified.

There is a legal requirement for all Local Plans to be subject to a HRA, set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2017.

## **HIA - Health Impact Assessment**

A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques. The HIA of the City Plan is incorporated into the Integrated Impact Assessment\*.

## **Heritage asset**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets include World Heritage Sites\*, Scheduled Monuments, Listed Buildings\*, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest but have not been formally designated.

## **Historic England**

The body responsible for advising the government, local authorities and others on historic buildings and archaeology. It was previously called English Heritage.

## **Hostile vehicle mitigation**

Structural measures that prevent access to, or close proximity of, unscreened vehicles to a building or space, or measures that reduce the speed of vehicles approaching a site or its defences.

## **Housing trajectory**

A projection of the number of new homes expected to be added to the City's housing stock over a given time period.

## **Inclusive design**

Inclusive design results in an environment which everyone can use, to access and benefit from the full range of opportunities available; confidently, independently, with choice and dignity, which avoids separation or segregation and is made up of places

and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.

### **Incubator office space**

Dedicated office space aimed at start-ups and normally let for a set period of time.

### **Infrastructure**

Term used to describe the facilities and services necessary for people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new public transport facility or school, to the creation of a local play space.

### **Infrastructure Funding Statement**

Proposed statutory statement reporting on the level of developer contributions received through the Community Infrastructure Levy\* and s106 planning obligations and setting out spending priorities for the next 5 years.

### **IIA - Integrated Impact Assessment**

An assessment process which considers the impacts of policies and proposals within statutory plans against environmental, equality, health, and community safety objectives. The City Plan 2040 IIA comprises: a Sustainability Assessment and Strategic Environmental Assessment - required by EU Directive to assess the social, economic and environmental impacts of new policies, It is supported by:

- an Equality Analysis - related to the City Corporation's duties under the Equalities Act 2010;
- a Health Impact Assessment\*.

The IIA seeks to assess the impact of the City Plan 2040 and its alternatives and identify any potential unintended consequences of its implementation.

### **Listed building**

A building or structure protected because of its historic or architectural interest. The list of such buildings is drawn up by Historic England\* and the Department for Culture, Media and Sport\*.

### **LDD - Local Development Document**

Documents containing policies and guidance, comprising Development Plan Documents\*, Supplementary Planning Documents\* and the Statement of Community Involvement\*.

### **LDS - Local Development Scheme**

Timetable and project plan for producing the City Plan\*. It is regularly updated.

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## **LIP - Local Implementation Plan**

Statutory transport plan produced by London Boroughs and the City Corporation bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

## **London Plan (Spatial Development Strategy)**

Prepared by the Mayor of London\*, it provides a London-wide planning strategy and the City's Local Plan\* must generally conform to it.

## **London Planning Guidance**

Guidance prepared by the Mayor of London\* to explain policies of the London Plan\*.

## **LVMF - London View Management Framework**

Guidance by the Mayor of London\* on the protection of important views, including those of St Paul's Cathedral and the Tower of London.

## **Major development**

For a full definition see Part 1 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are:

- Residential development of 10 or more dwellings or on a site of 0.5 hectares or more.
- Development of other uses, where the floorspace to be created by the development is 1,000 square metres or more, or the site areas is 1 hectare or more.

## **Mayor of London**

The Mayor is the executive head of the Greater London Authority\* and is also responsible for a number of related organisations, including Transport for London\*, Homes for London Board and the Metropolitan Police Authority. The Mayor prepares London-wide strategies, including those for planning (the London Plan\*), transport, waste, energy, economic development, housing and air quality. He has powers to direct decisions on large planning applications.

## **Meanwhile use**

A use which is to last for a limited time, or one which is limited in its operation for a particular period of time. Meanwhile is defined as at or during the same time, while something else is being done.

## **Municipal waste**

Waste collected by a local authority, including domestic waste and street cleansing waste. It also includes commercial waste collected by the authority, although waste producers may also have this privately collected.

## **NPPF - National Planning Policy Framework**

The government's statement of planning guidance to local planning authorities, issued by the Department for Levelling Up, Housing and Communities\*. The latest version was published in December 2023. The City Corporation must take account of it in preparing and implementing its planning policies.

## **Noise Assessment**

A technical assessment which identifies whether the overall effect of the noise exposure of a building (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation:

Significant observed adverse effect level: the level of noise exposure above which significant adverse effects on health and quality of life occur.

Lowest observed adverse effect level: the level of noise exposure above which adverse effects on health and quality of life can be detected.

## **Offsetting measures**

The measures permitted for dealing with residual emissions remaining after taking account of energy efficiency and decentralised and low carbon energy sources e.g. retrofitting works undertaken by a developer to improve the energy efficiency of existing buildings in the vicinity of the development; export of low carbon heat from the development to other developments; or investment in low carbon community heat infrastructure.

## **Open space**

Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

## **Permitted development rights**

A national grant of planning permission which allows certain building works and change of use to be carried out without having to secure planning permission.

## **Pipe subway**

Tunnels, mainly under streets, that accommodate utilities such as gas and water pipes and electricity and telecommunications cables, providing a more efficient alternative to burying these in the ground.

## **Planning obligations / s106 agreements**

Legal agreements negotiated between the City Corporation and developers (or offered unilaterally by developers) setting out financial and non-financial undertakings to mitigate the direct impact of development. Also known as Section 106 Agreements, or s106 planning obligations. From July 2014 some financial planning obligations in the City have been replaced by the Community Infrastructure Levy\*.

## **PPG - Planning Practice Guidance**

An online resource which brings together national guidance on various topics in one place and explains the policies in the National Planning Policy Framework (NPPF)\* in more detail.

## **Policies Map**

A map accompanying the City Plan\* showing where its policies apply to specific locations.

## **PSC - Principal Shopping Centre**

Significant clusters of retail activity within the City of London, which are the local expression of the London Plan's CAZ Retail Clusters. There are 4 PSCs within the City of London: Cheapside, Moorgate/Liverpool Street, Leadenhall Market and Fleet Street.

## **Public Examination**

The City Plan\* will be subject to public examination before an independent planning inspector. The inspector assesses the "soundness" of the City Plan.

## **Public realm**

Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

## **Registered Provider**

Not for profit providers of affordable\* and other social housing, including housing associations and regulated by Government.

## **Residential amenity**

The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.

## **Retail Impact Assessment**

An assessment undertaken for an application for retail use on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

## **Safeguarded wharves**

Sites that have been safeguarded for cargo handling uses such as intra-port or transshipment movements and freight-related purposes. On 19 February 2021, the Secretary of State for Levelling Up, Housing and Communities issued Directions for safeguarded wharves in London, requiring all planning applications for safeguarded wharves to be referred to the Mayor of London. There is one safeguarded wharf in the City of London at Walbrook Wharf.

## **Safer City Partnership**

A partnership, comprising representatives from a range of City interests, whose aim is to reduce the level of crime, disorder, antisocial behaviour, terrorism and substance misuse in the City.

## **Secured by Design**

A crime prevention initiative, to encourage those involved in the development industry to adopt crime prevention measures to assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment.

## **Short term residential letting**

Letting of residential property on a non-permanent basis. Under the Deregulation Act 2015, short term residential letting of domestic premises which are liable for council tax for less than 90 days in a calendar year does not require planning permission. Letting for periods of more than 90 days will require permission.

## **SINCs - Sites of Importance for Nature Conservation**

London's most valuable places for wildlife that provide local people with access to nature have been identified as Sites of Importance for Nature Conservation (SINCs). The sites are graded as being of Metropolitan, Borough or Local importance.



## **Smart infrastructure**

Infrastructure which includes sensors that produce, analyse and help to securely share data on the performance of the built and natural environment.

## **Social and community facilities**

Social and community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments, including the Town and Country Planning (Amendment) (England) Regulations 2020. The majority of social and community facilities fall within Class E (Commercial, business and services), Class F.1 (Learning and non-residential institutions) and Class F.2 (Local community uses) use classes. Community facilities include:

- Leisure and cultural facilities (including arts, entertainment and sport facilities)
- Community centres and meeting places (including places of worship)
- Libraries
- Facilities for children (from nursery provision to youth clubs)
- Education (including adult education)
- Healthcare facilities

## **SCI - Statement of Community Involvement**

A plan for public consultation on planning policy documents and planning applications. The City Corporation's SCI was adopted in 2022.

## **Strategic Cultural Areas**

Areas identified in the London Plan\* with internationally important cultural institutions, which are also major tourist attractions, and include the West End, South Bank/Bankside/London Bridge, Barbican, Wembley, the South Kensington museum complex/Royal Albert Hall, London's Arcadia, Olympic Park and Lee Valley Regional Park.

## **Strategic developments (applications referable to the Mayor)**

The planning applications that must be referred to the Mayor of London\* under the Town and Country Planning (Mayor of London) Order 2008 and any amendments hereto.

## **SEA - Strategic Environmental Assessment**

The environmental assessment of plans, required by EU Directive 2001/42/EC. It is carried out as part of the sustainability appraisal\*.

## **Strategic Flood Risk Assessment**

A document prepared by the Local Planning Authority to provide information on areas that may flood and on all sources of flooding as required by the NPPF\*.

## **SHLAA - Strategic Housing Land Availability Assessment**

A technical assessment to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework\*, paragraph 67).

In London, the Mayor of London\* carries out a London-wide SHLAA to inform the London Plan\* as it determines housing targets for each borough and the City of London. The City of London City Plan relies on the land availability evidence provided by the London-wide SHLAA.

## **SHMA - Strategic Housing Market Assessment**

An assessment of future housing requirements in an area. The assessment informs the development of local and strategic plan strategies and housing targets and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period including addressing the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, disabled people, service families and people wishing to build their own homes).

## **Street hierarchy**

Categorisation of streets in the City of London Transport Strategy\* which describes the function of every street in terms of motor traffic:

- **London Access Streets (TfL network):** Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.
- **City Access Streets:** Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations.
- **Local Access Streets:** Primarily used for the first or final part of a journey, providing access for vehicles to properties.

## **SPD - Supplementary Planning Document**

A document that explains the policies of the City Plan\* in detail. It is subject to consultation, but not public examination\*.

## **SA - Sustainability Appraisal**

The City Plan\* is subject to SA, which ensures that it is soundly based on the principles of sustainable development. SA is carried out as the policies are developed or reviewed so that they can take account of its findings. The SA of the City Plan 2040 has been combined with other assessment processes in an Integrated Impact Assessment (IIA)\*.

## **SuDS - Sustainable Drainage Solutions**

A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.

## **Traffic and Environmental Zone**

A security and surveillance cordon that surrounds the City of London. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City.

## **Transport Assessment**

This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.

## **TfL - Transport for London**

The body, under the control of the Mayor of London, responsible for strategic transport policy and the provision of public transport, including buses, the Underground and the DLR. TfL is the Traffic and Highways Authority for the Transport for London Road Network (TLRN) or red routes, and controls all traffic signals in London".

## **Transport Strategy**

A strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.

## **Travel Plan/Cycling Promotion Plan**

A long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.

## **Tower of London World Heritage Site Consultative Committee**

A committee of experts and policy makers providing guidance for the preparation and implementation of the Tower of London Management Plan, and comprising representatives from: Historic Royal Palaces, City Corporation, Historic England\*, GLA\*, International Council on Monuments and Sites (ICOMOS), Department of Culture, Media and Sport\* (DCMS) and the London Boroughs of Southwark and Tower Hamlets.

## **UNESCO - United Nations Educational, Scientific and Cultural Organisation**

Among UNESCO's responsibilities are the inscription of World Heritage Sites, which include the Tower of London.

### **Urban greening**

A process for delivering additional green infrastructure in the City of London. Due to the morphology and density of the built environment in the City, green roofs, green (or living) walls, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.

### **UGF - Urban Greening Factor**

A model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.

### **Urban heat island**

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, central London can be up to 10°C warmer than the rural areas around London. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

### **Use Classes Order**

A statutory instrument made by the Secretary of State under Section 22 of the Town and Country Planning Act 1990, subsequently amended several times, setting out broad classes of use for land and buildings.

### **Viability Assessment**

An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements that can be provided.

### **Waste management**

The London Plan's\* definition of waste management includes its use for energy recovery or composting or recycle sorting and bulking but does not include waste transfer.

### **Wheelchair accessible**

Homes built to Building Regulation Requirement M4 (3) (2) (b): Wheelchair user dwellings, where the dwelling is constructed to meet the needs of wheelchair users.

Also includes hotel rooms which are built to be accessible to wheelchair users.

**Wheelchair adaptable**

Homes built to Building Regulation Requirement M4 (3) (2) (a): Wheelchair user dwellings, where the dwelling is constructed to allow simple adaptation to the dwelling to meet the needs of wheelchair users.

**Windfall development/sites**

Housing development that does not take place on sites identified in the Development Plan\* or on the Policies Map\* but is brought forward by developers.

**World Heritage Site**

A site inscribed by UNESCO\* for its Outstanding Universal Value. The Tower of London, located just outside the City's boundaries, is designated as a World Heritage Site.

**Zero carbon**

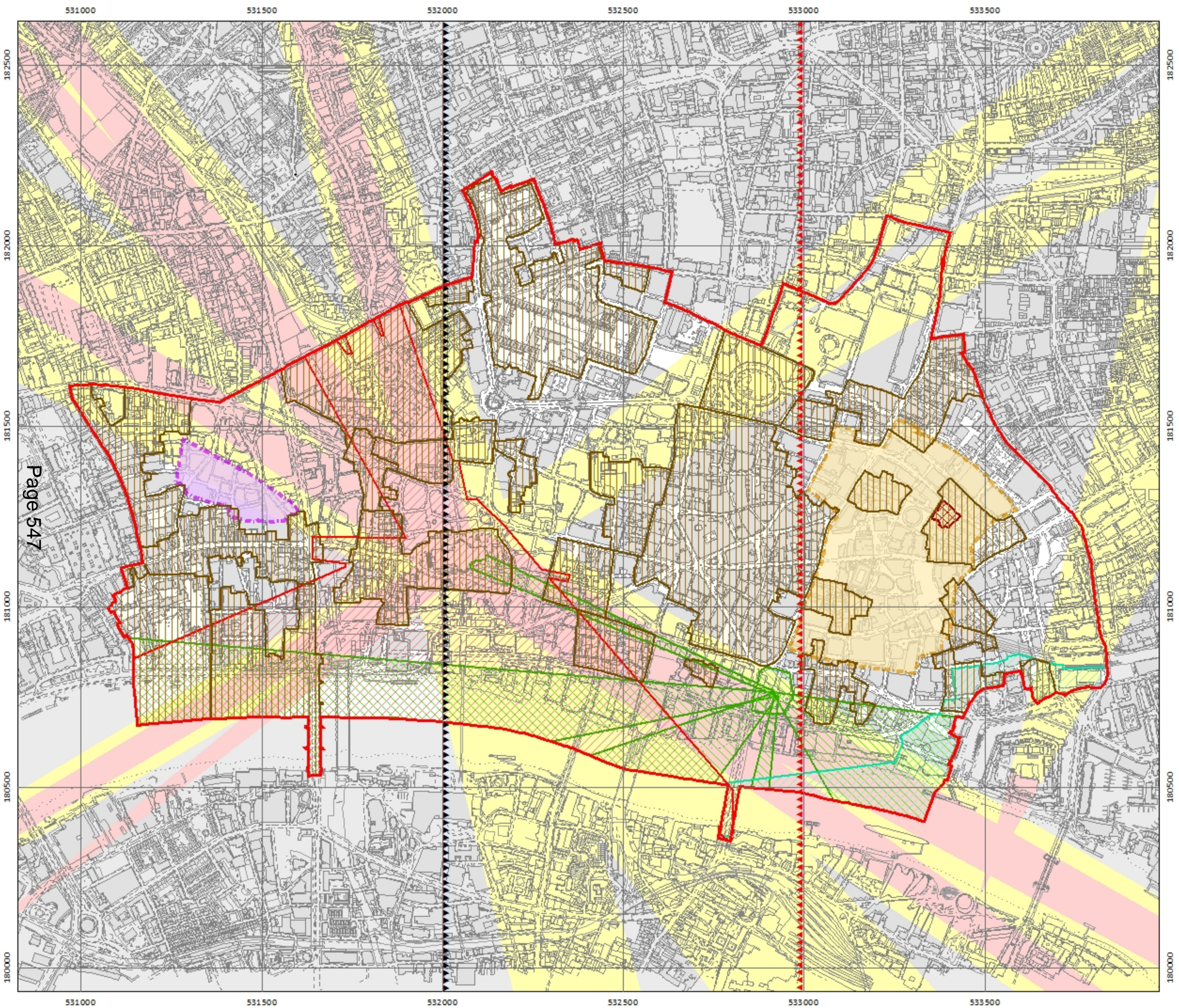
Activity that causes no net release of carbon dioxide or other greenhouse gas emissions into the atmosphere.

**Zero waste**

Making the most efficient use of resources by minimising the City of London's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.

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CITY OF LONDON  
**LOCAL PLAN**  
**PROPOSED SUBMISSION DRAFT**  
**POLICIES MAP A**  
 March 2024  
**Tall Buildings, Views and Heritage**

- KEY**
- Administrative Boundary of the City of London
- | Historic Environment                                     | Policy No.       |
|--|------------------|
| Conservation Areas                                       | S11<br>HE1       |
| Bevis Marks Synagogue Immediate Setting Area             | HE1              |
| Tower of London World Heritage Site - Local Setting Area | S11 & S13<br>HE3 |
- | Tall Buildings and Protected Views  | Policy No. |
|---|------------|
| City Cluster Tall Buildings Area  | S12        |
| Fleet Valley Tall Buildings Area  | S12        |
| London View Management Framework - Protected Vista Landmark Viewing Corridors       | S12 & S13  |
| London View Management Framework - Protected Vista Wider Setting Consultation Areas | S12 & S13  |
| St Paul's Heights Policy Area   | S12 & S13  |
| Monument Views and Setting  | S12 & S13  |
| London City Airport Safeguarding Area   | S12        |
| London Heathrow Airport Safeguarding Area   | S12        |
- This Policies Map is one of four covering the City of London. See also Policies Maps B, C and D.

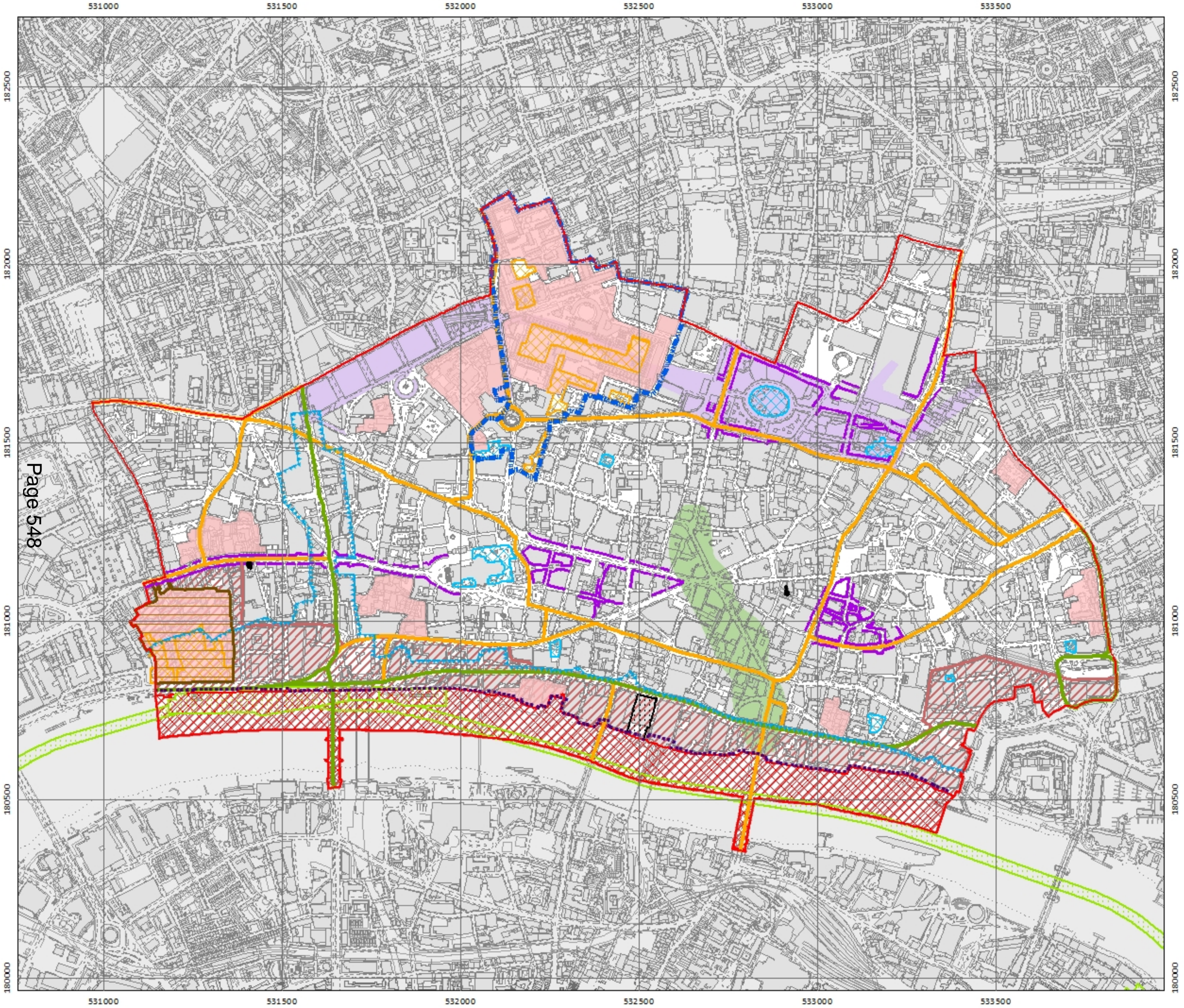


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













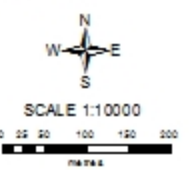
Page 548

CITY OF LONDON  
**LOCAL PLAN**  
**PROPOSED SUBMISSION DRAFT**  
**POLICIES MAP B**  
 March 2024  
**Key City Places**

**KEY**

	Administrative Boundary of the City of London	
	Thames Policy Area	Policy No. S17
	Thames Tideway Tunnel Safeguarding Area	S17
	Riverside Walk	S17
<b>Culture and Visitors</b>		
	Assets of Community Value	S6 CV1
<b>Transport and Servicing</b>		
	Crossrail Safeguarding Area	S9
	Bank Station Northern Line Upgrade Safeguarding Area	S9
	London Access	S9
	City Access	S9
<b>Open Spaces and Green Infrastructure</b>		
	Site of Metropolitan Importance for Nature Conservation	OS3
	Site of Borough Importance for Nature Conservation	OS3
	Site of Local Importance for Nature Conservation	OS3
<b>Climate Resilience and Flood Risk</b>		
	City Flood Risk Area	S15 CR2
<b>Circular Economy and Waste</b>		
	Safeguarded Wharf	S16 & S17 VT4
<b>Retail</b>		
	Principal Shopping Centre	S5 RE1
<b>Housing and Neighbourhoods</b>		
	Identified Residential Areas	S3
	The Temples	TP1
	Babylon and Golden Lane Neighbourhood Area	S23

This Policies Map is one of four covering the City of London. See also Policies Maps A, C and D.




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CITY OF LONDON  
**LOCAL PLAN**  
**PROPOSED SUBMISSION DRAFT**  
**POLICIES MAP C**  
 March 2024


City Cluster Tall Buildings Area

**KEY**

 Administrative Boundary of the City of London

Tall Buildings contours (m AOD)

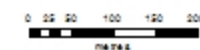
-  75
-  80
-  90
-  100
-  120
-  140
-  160
-  180
-  200
-  220
-  240
-  260
-  280
-  300

 Dashed line represents contours that overlap, with labels showing the heights of the highest contour and lowest contour.

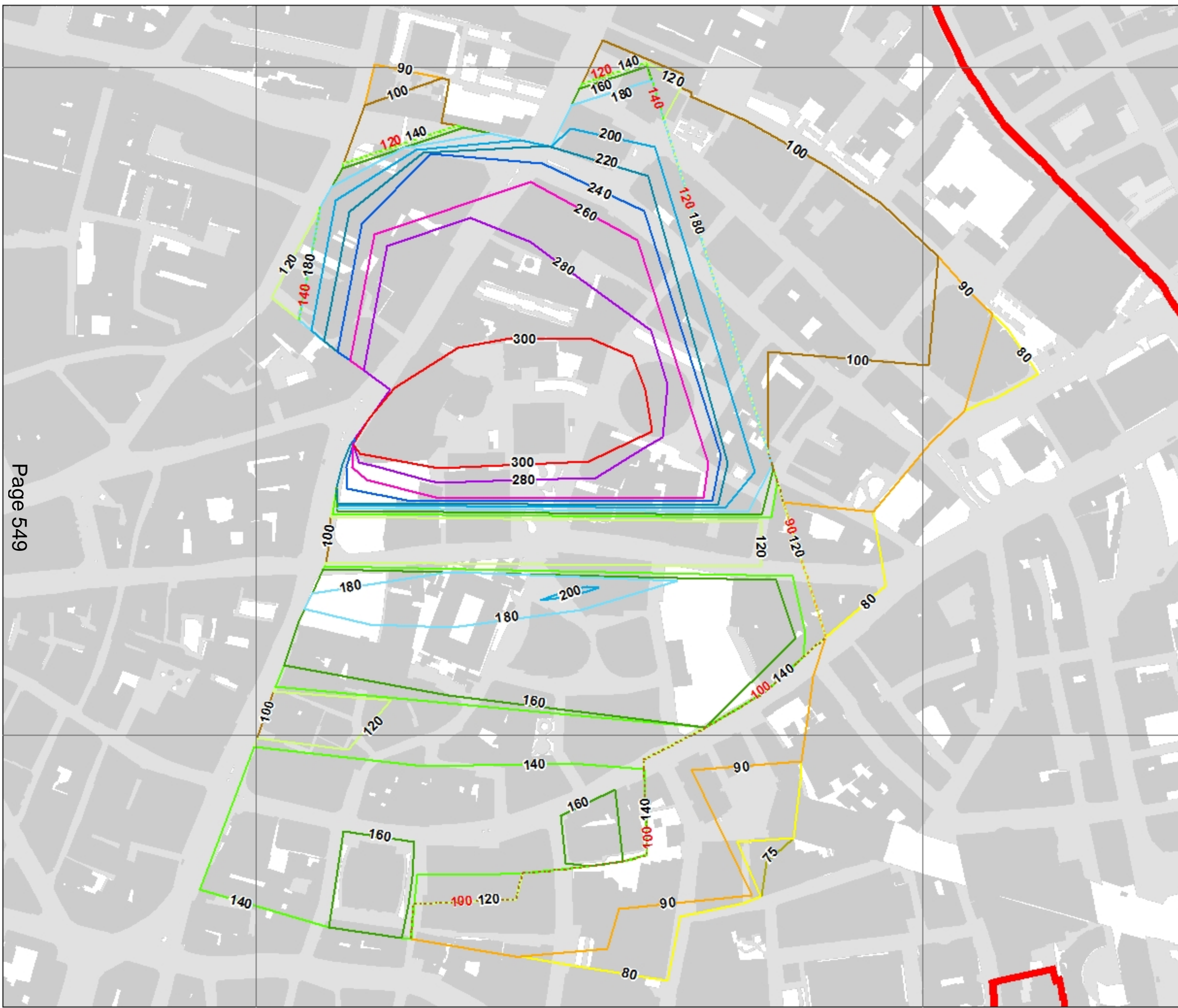
This Policies Map is one of four covering the City of London. See also Policies Maps A, B and D.



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CITY OF LONDON  
**LOCAL PLAN**  
**PROPOSED SUBMISSION DRAFT**  
**POLICIES MAP D**  
 March 2024

Fleet Valley Tall Buildings Area

**KEY**

 Administrative Boundary of the City of London

**Tall Buildings contours (m AOD)**

 75

 80

 90

181500

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This Policies Map is one of four covering the City of London.  
See also Policies Maps A, B and C



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# Equality Impact Assessment

Local Plan Review

City Plan 2040

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DECEMBER 2023

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# 1 Introduction

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- 1.1 This Equality Impact Assessment (EqIA) considers the potential equality effects of the policies of the City Plan 2040. The main objective of the EqIA is to provide the City Corporation with information about the impact on the protected characteristics identified in the 2010 Equality Act, to support its decision-making process in adopting the Local Plan. This Report has been prepared by Quod.

## The City Plan 2040

- 1.2 The new City Plan 2040, sets out the Corporation's vision, strategic objectives and planning framework to guide future development and decision making in the City of London area ("the City") for the upcoming years to the year 2040. The City Plan 2040 replaces the Local Plan 2015 adopted in January 2015.
- 1.3 The Local Plan has been built on the principles of sustainable development in line with the National Planning Policy Framework (NPPF) objective for the planning system to deliver economic, social and environmental change.
- 1.4 The **economic objectives** build on the City's existing role as a national and global economic centre and support the continued economic and employment growth. The City Plan 2040 sets out to:
- Deliver sustainable economic growth, including a minimum of 1.2 million sqm net additional office floorspace by 2040;
  - Ensure new and refurbished office space meets the environmental, social and governance (ESG) priorities of occupiers and their workforces;
  - Provide flexible and adaptable workspace that meets the needs of different sectors and business sizes, supporting specialist business clusters and promoting a range of complementary uses including education;
  - Create a more vibrant and diverse retail economy;
  - Enhance the City's evening and weekend economies;
  - Create new and enhanced culture, leisure and visitor attractions;
  - Deliver the accommodation, facilities, attractions and infrastructure required for a leading destination;
  - Ensure development plays a significant role in enhancing the life of the Square Mile and the capital as a whole, both through the uses and design of development and through appropriate planning contributions; and
  - Help to facilitate the infrastructure requirements of the Square Mile.
- 1.5 The **social objectives** aim to reimagine the City as a 24 hour 7 day a week destination and diversify the uses in the City through:

- Delivering new, inclusive open spaces and enhancing the City's public realm for everyone;
- Enhancing the City's riverside for everyone through the delivery of new and improved public realm and greater vibrancy;
- Enhancing and transforming seven Key Areas of Change where significant change is expected and providing a policy framework to guide sustainable change in those areas;
- Engaging with the City's communities including workers and residents and other stakeholders;
- Creating a more inclusive, healthier, and safer City for everyone;
- Delivering additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City; and
- Enhancing the City's social infrastructure and creating new sports and recreation opportunities across the Square Mile.

1.6 The **environmental objectives** aim to ensure that residents, workers and visitors in the City enjoy a good living environment by:

- Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development;
- Delivering urban greening and greater biodiversity;
- Celebrating, protecting and enhancing the City's unique heritage assets;
- Enhancing the City's distinctive and iconic skyline while preserving strategic views of St Paul's Cathedral and the Tower of London World Heritage Site;
- Ensuring exemplary design of development;
- Promoting greater use of the river Thames for passenger and freight transport, increased enjoyment of the City's riverside and reductions in the risk of flooding; and
- Ensuring development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.

### Assessment Summary

1.7 This Equality Impact Assessment provides the City Corporation with information about potential impacts on the protected characteristics identified in the 2010 Act, to inform the decision making in adopting the new City Plan.

1.8 The EqIA has not found any potential negative impacts arising from the policies of the City Plan 2040 on people with protected characteristics under the 2010 Equality Act.

1.9 The assessment considers that the policies of the City Plan will have a positive impact on people in general, with differential and disproportionate beneficial impacts identified on people with some particular protected characteristics.

## 2 Methodology

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### Legislative Context

- 2.1 In considering the Local Plan, the City Corporation is required to consider potential equality effects under the 2010 Equality Act (“the 2010 Act”) as part of the Public Sector Equality Duty (PSED) stated in the 2010 Act.
- 2.2 Guidance<sup>1</sup> for local authorities published by the Government Equalities Office clarifies that the 2010 Act does not impose a legal requirement to conduct an Equality Impact Assessment, but it emphasises the importance of consciously considering the aims of the PSED in decision making.
- 2.3 The 2010 Act forms the basis of anti-discrimination law in Great Britain. The 2010 Act (Section 4) defines the protected characteristics which are covered by the Act:
  - Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Sex
  - Sexual orientation
- 2.4 The requirement for public authorities to have due regard to equality considerations when exercising their functions is stated in Section 149 of the 2010 Act. This Public Sector Equality Duty (PSED) requires public authorities to have due regard for the need to:
  - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 2.5 As set out in Section 149 (3) of the 2010 Act, the need to advance equality of opportunity includes the need to:

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<sup>1</sup> Government Equalities Office, 2011. Equality Act 2010: Public Sector Equality Duty What do I need to know? A quick start guide for public sector organisations.

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

## Approach

- 2.6 The City Plan policies will have an impact on residents, workers and visitors in the City of London. Each of these will have some protected characteristics as defined by the 2010 Act, and there will be varying degrees of intersectionality (such as age, race and sex).
- 2.7 The purpose of this EqIA is to identify where there may be a differential equality effect, where people with a protected characteristic are impacted differentially to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- 2.8 Therefore, policies were assessed against their potential to differentially affect people with particular protected characteristics as a result of those protected characteristics. In some instances, a disproportionate effect could be likely where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
- 2.9 The scale and significance of such impacts cannot always be quantified. Therefore, the consideration of equality effects includes a descriptive analysis of the potential impacts and identifying their nature – whether such impacts are adverse or beneficial.
- 2.10 In many cases, the actual equality effect will in practice depend on the detail of implementation of policies, and therefore where possible this EqIA focuses on the effects attributable to the adoption of those policies themselves. Individual decisions taken under these policies, including decisions on whether to grant planning permissions, will themselves also need to meet the PSED, within the framework set by the City Plan.



## 3 Local Context

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3.1 This section of the EqIA provides relevant baseline information in relation to protected characteristics, to understand if the demographics of the local population have any particular protected characteristics that may be affected by the Local Plan.

### Methodology

3.2 The EqIA's baseline analysis has been informed by a range of datasets and sources, comprising:

- Census 2021<sup>2</sup>;
- Census 2011<sup>3</sup>;
- Annual Population Survey 2021<sup>4</sup>; and
- Live Births 2021<sup>5</sup>.

3.3 The City as a whole has a small residential population as it is a largely commercial area of London. Therefore, the workplace population is significantly higher and this has been captured in this baseline analysis. Data on the protected characteristics of City's workplace is not available for all protected characteristics, thus the data included in this assessment has been limited by availability.

3.4 Because of the close employment and community relations between the City and its neighbouring boroughs (as shown in **Figure 3.1**), a baseline analysis of the neighbouring boroughs has also been included for the purpose of this assessment.

3.5 The data at the basis of this context analysis is presented in **Annex 1**.

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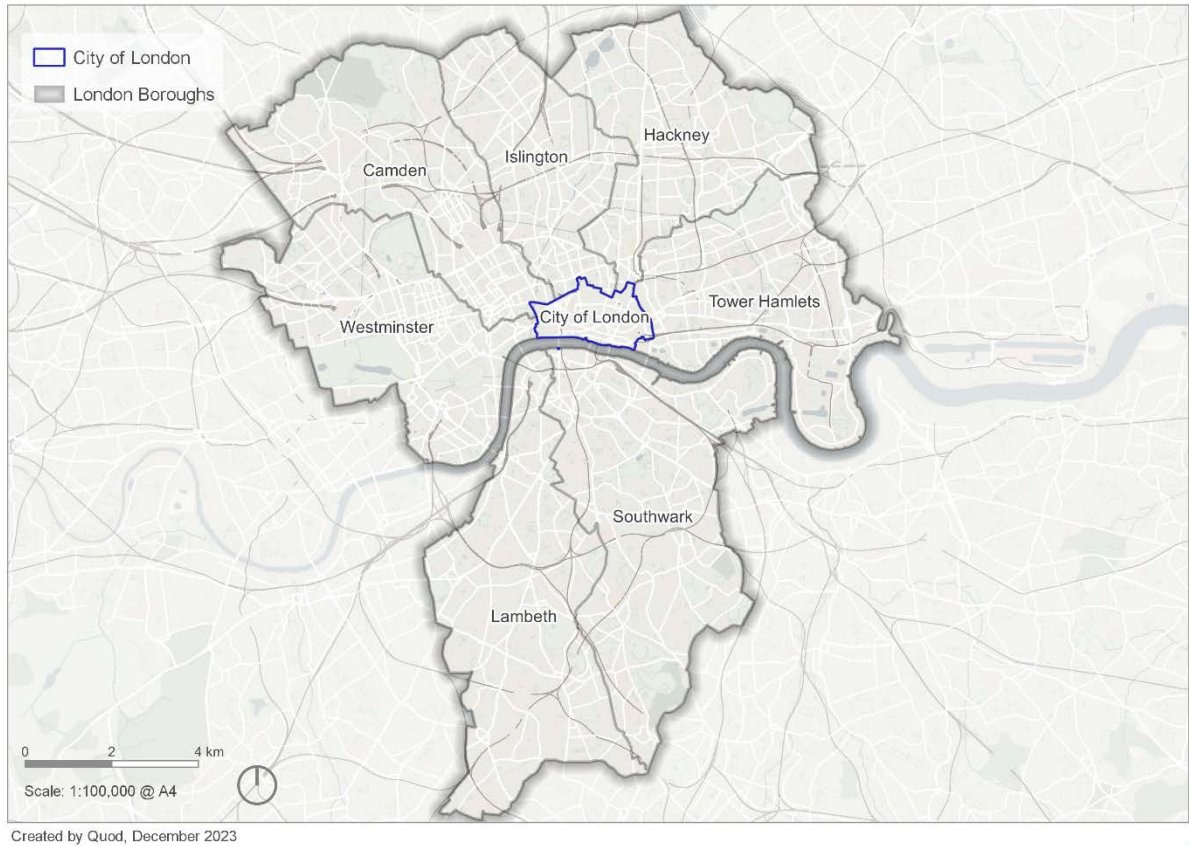
<sup>2</sup> Office for National Statistics, 2021. Census.

<sup>3</sup> Office for National Statistics, 2011. Census.

<sup>4</sup> Office for National Statistics, 2021. Annual Population Survey.

<sup>5</sup> Office for National Statistics, 2021. Live Births.

Figure 3.1 – Study Areas



[Map showing the London boroughs of Westminster, Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth and the City of London.]

### Population Context

- 3.6 The City has a total residential population of 8,600 people. Between 2011 and 2021, the population has grown by 16% - twice the growth rate seen in London and the majority of the neighbouring boroughs. Camden saw a similar growth rate in the same period. Tower Hamlets had a slightly higher growth rate of 22%. Approximately 1 in 5 Londoners live across the seven boroughs and the City.
- 3.7 Given the nature of the City as an employment and commercial area, the workday population is considerably larger than the resident population. The working population of the City is approximately 615,000 people<sup>67</sup>.

<sup>6</sup> Office for National Statistics, 2022. Business Register and Employment Survey.

<sup>7</sup> Workplace estimates vary with the Annual Population Survey (2022) suggesting it could be as high as 770,000.

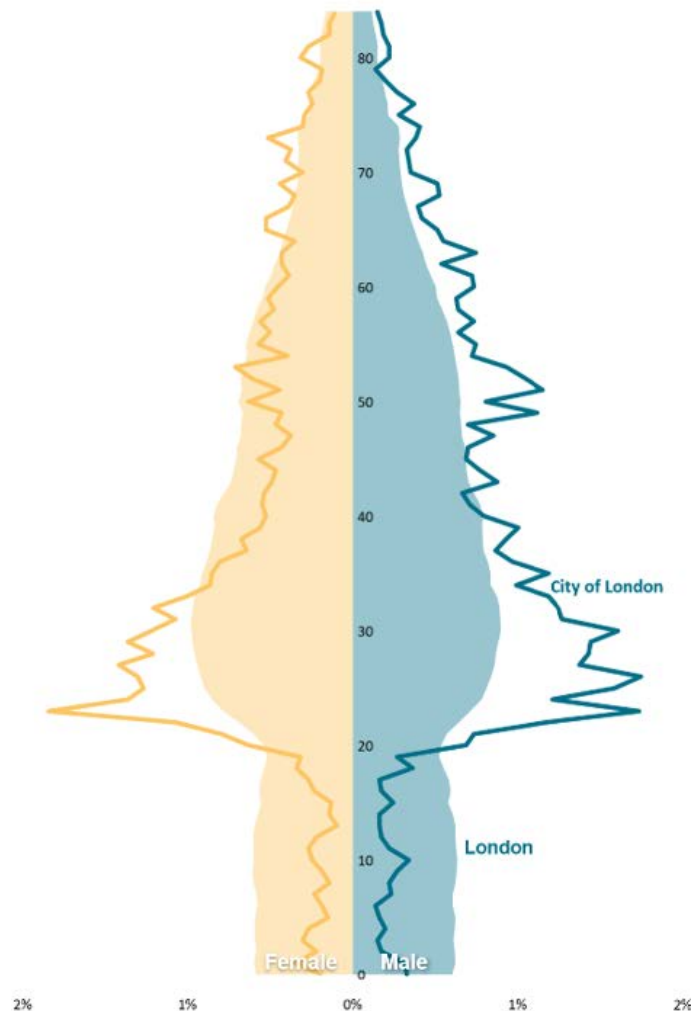
## Protected Characteristics

- 3.8 The following section provides baseline data on the demographics of the local population with respect to the protected characteristics as defined by the 2010 Act where available data exists.

### Age

- 3.9 Across the City and the eight neighbouring boroughs, the proportion of working age residents is higher than the average for London. The City has a significantly lower proportion of residents under the age of 20 and a higher proportion of working age residents, particularly aged between 20 and 30, compared to London, as shown in **Figure 3.2**.

Figure 3.2 – Comparison between the Population Structure in City of London and London (2021 Census)



[Population pyramid showing the population structure in the City of London compared to London overall.]

- 3.10 The City's workforce is younger than the London average, with 4 in 5 workers aged under 50 years old. Across the surrounding boroughs, Camden and Hackney have a slightly older workforce than the London average.
- 3.11 The data does not indicate that there is a particularly sensitive age profile in the City among the residents. However, individuals within different age groups can be more sensitive to changes. For example, certain policies such as those that promote improvements to public realm and building accessibility can impact the elderly, so may differentially affect this age group.

### Sex

- 3.12 The sex split of residents and workers in the City is weighted more towards the male sex compared to the average for London. As shown in **Figure 3.2**, the proportion of both female and male residents declines after the age of 35, although the decline is sharper for female residents. There are more men over the age of 35 than women living in the City.
- 3.13 Across the eight surrounding boroughs, the sex split is more similar to the London average. This is true for both residents and workers. Camden is the only borough where the proportion of female workers is higher than the proportion of male workers.

### Gender Reassignment

- 3.14 A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex (2010 Act, Section 7).
- 3.15 To be protected from gender reassignment discrimination, one does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing your physiological or other gender attributes is a personal process rather than a medical one. You can be at any stage in the transition process – from proposing to reassign your gender, to undergoing a process to reassigning your gender, or having completed it (as per the Equality and Human Rights Commission).
- 3.16 According to the 2021 Census, the proportion of residents aged 16 years or over across the eight boroughs who indicated that they have a gender identity different from their sex registered at birth is broadly in line with the London average. The proportion is slightly lower in the City.

### Sexual Orientation

- 3.17 A person's sexual orientation includes their sexual behaviour, sexual attraction and sexual identity. Sexual orientation is a protected characteristic to allow individuals to choose how to express their sexual orientation without discrimination. This includes discrimination in the provision of goods, facilities and services on grounds of sexual orientation.

- 3.18 Discrimination towards sexual orientation is possible in various forms including: discrimination arising from one's self-perceived sexual identity; one's perceived sexual orientation (discrimination by perception); or one's links to other individuals and their sexual orientation (discrimination by association).
- 3.19 The City and surrounding boroughs have a higher proportion of the population aged 16 years or over that identified as gay, lesbian or bisexual than across London (2021 Census).

### Marriage and Civil Partnership

- 3.20 According to the 2021 Census, across the City and the eight surrounding boroughs, the proportion of residents who were never married or in a registered partnership is higher than across London. Conversely, the proportion of residents who are married is lower. The proportions of residents who are separated, divorced, formerly in a civil partnership, or widowed are broadly in line with the London average for all nine spatial areas.

### Pregnancy and Maternity

- 3.21 The ONS does not provide statistics on the number of people who are pregnant. Therefore, this baseline analysis considered live birth data as a proxy. The general fertility rate (GFR), measured as number of live births in a year per 1,000 women aged 15 to 44 years, is lowest in the City when compared to all spatial levels. Hackney is the only borough where the GFR is broadly in line with London, whereas all other boroughs experience a lower GFR than the London average.

### Race

- 3.22 A person's race can include a number of personal characteristics. As defined in the 2010 Act race includes colour, nationality and ethnic or national origins. Therefore, this baseline assessment has considered a range of data sources including ethnicity, place of birth and language spoken to provide a baseline analysis of the study area with respect to race.

### Ethnicity

- 3.23 London is a diverse city – 54% of residents identify as White, 21% as Asian/Asian British, 14% as Black/African/Caribbean/Black British and 12% identify as Mixed/Multiple Ethnic Groups or Other Ethnic Group (2021 Census).
- 3.24 The ethnic diversity is mirrored across the City and the surrounding boroughs. However, Tower Hamlets has a significantly higher proportion of Asian/Asian British residents and Lambeth and Southwark have higher proportions of Black/African/Caribbean/Black British residents.

3.25 While a detailed breakdown is not available, it is estimated that 37% of the City's workforce is of Black, Asian or a minority ethnic origin<sup>8</sup>.

#### *Place of Birth*

3.26 The 2021 Census [provides data on place of birth. In London, 59% of residents were born in the UK; 16% were born in the rest of Europe; 13% were born in the Middle East and Asia; 7% were born in Africa; 4% were born in the Americas and Caribbean, and 1% were born in Australasia.

3.27 Half of the residents in the City were born in the UK. In contrast with London as a whole, a higher proportion of residents were born in Europe. In Tower Hamlets, a higher proportion of residents were born in Asia or the Middle East than across all spatial levels.

3.28 The City has an international workforce, with 42% of workers born outside the UK – 14% from the European Economic Area and 27% from the rest of the world<sup>9</sup>.

#### *Language*

3.29 Language has been defined in the 2021 Census as an individual's 'main language', which is considered "a person's first or preferred language". The proportion of residents who indicated that English is their preferred language is broadly similar across all spatial areas.

#### *Religion or Belief*

3.30 A smaller proportion of City residents proactively identify themselves as belonging to a religion than across all spatial levels (2021 Census). Across the eight boroughs, Tower Hamlets and Westminster had the higher proportions of residents that proactively identify themselves as belonging to a religion, at a similar rate with London.

3.31 The City is home to a number of places of worship, including 45 Christian churches and chapels and one Synagogue.

#### *Disability*

3.32 The 2021 Census asked residents to self-assess their health. The proportion of residents in the City who have self-assessed their general state of health as "very good" and "good" is higher than across all spatial levels. Across all spatial levels, the highest proportion of residents who self-assessed their health as "bad" and "very bad" is in Islington. The proportion of residents who indicated they are disabled under the Equality Act (2010) is broadly in line across all spatial levels.

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8 City of London (2023) City of London Factsheets – February 2023. Available at:

<https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf> [Accessed 23/11/2023]

9 City of London (2023) The role of financial and professional services in the UK – November 2023. Available at:

<https://www.cityoflondon.gov.uk/assets/Business/city-stats-factsheet-2023.pdf>.



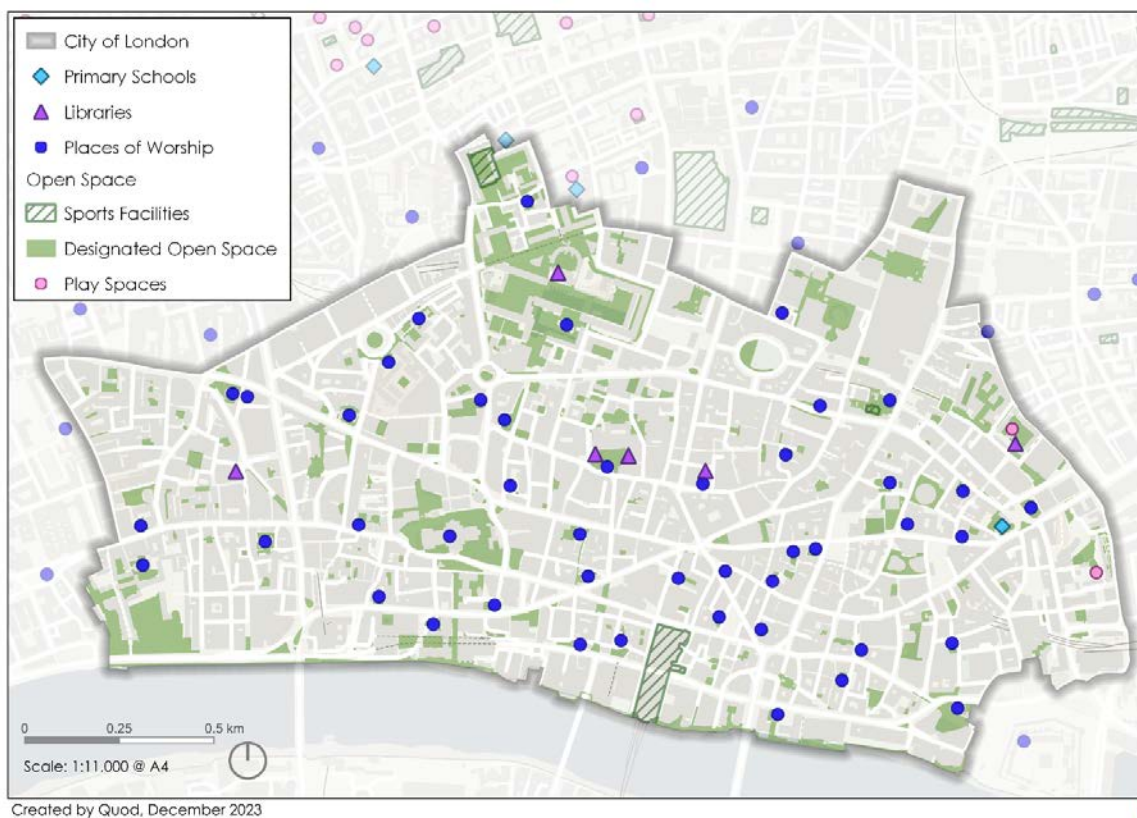
## Visitors to the City of London

- 3.33 The City of London is not just a home and a place for work. Millions of visitors come to the City yearly for business, leisure and other activities from across London, the UK and the whole world. While it is not possible to statistically represent the characteristics of these people, it is acknowledged that they will have a range of protected characteristics.
- 3.34 The City Plan 2040 includes strategic design policies for the City to continue to attract and even increase high visitor numbers, therefore it is important to acknowledge that some will also be impacted by the equality effects of the Local Plan.

## Community Infrastructure

- 3.35 The City is home to historic places of worship and open spaces which support the community uses such as schools, libraries and play spaces. An overview of the community infrastructure is presented in **Figure 3.3**, with a focus on those with particular relevance to protected characteristics. This is not intended to be comprehensive – there is a wide range of definitions of infrastructure, and some, such as places of worship, may be informal and unregistered. It is indicative of the range of places that may be affected by the City Plan.

Figure 3.3 – Community Facilities<sup>10</sup> within the City of London



<sup>10</sup> This figure includes sports facilities which are owned by or in partnership with local authorities or are charities or social enterprises. The City has numerous privately owned sports facilities.

[Map showing the community facilities (schools, libraries, places of worship, open spaces, playspaces and sports facilities) in the City of London.]

## Summary

- 3.36 The City's resident population is generally comprised of younger working age residents and with proportionately fewer children living here. There are disproportionately more men living in the City compared to women (this is also true of the workday population).
- 3.37 The City's resident population includes a high proportion of residents not born in the UK, including a high proportion of residents born in Europe and the Americas and Caribbean. The City also has an international workforce.
- 3.38 The purpose of the baseline is to provide an overview of the demographic characteristics of the population living and working in the City and the eight surrounding boroughs, where data is available. The potential impacts of the Local Plan will be considered on each protected characteristic, independent of it being disproportionately represented across the nine spatial areas.
- 3.39 Following the baseline analysis, **Table 3.1** sets out the protected characteristics that are considered could potentially be disproportionately affected by the City Plan because of their prevalence in the local population, workers or visitors. The potential disproportionate effects will be considered in the assessment section where relevant.

Table 3.1 – Groups identified in baseline for consideration for potential disproportionate effects

Protected Characteristic	Potential for a Disproportionate Effects	Comments
Age	Yes	High proportion of young adults in both the resident and working population
Sex	Yes	High proportion of men in both the resident and working population
Gender Reassignment	No	No disproportionate representation identified
Sexual Orientation	Yes	High proportion of local population identified as gay, lesbian or bisexual
Marriage & civil partnership	No	No disproportionate representation identified
Pregnancy and maternity	No	No disproportionate representation identified
Race	Yes	The City and surrounding boroughs have an ethnically diverse population



Religion or belief	Yes	There are numerous places of worship across the City
Disability	No	No disproportionate representation identified

## 4 Assessment

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- 4.1 The main objective of an Equality Impact Assessment is to provide the City Corporation with information, particularly with regard to their impact on the protected characteristics identified in the 2010 Act, to inform their decision making. The tables set out in this section cover each chapter of the City Plan, with a row for each proposed policy, a column for each protected characteristic, and notes explaining the assessment. Positive or negative effects are considered, and a single +/- signifies a general effect, while a double symbol ++/-- signifies an effect that may have a particular differential effect with respect to a specific protected characteristic.
- 4.2 The assessment didn't identify any likely significant negative equality effects from the City Plan policies. The assessment divided them into areas where there are general positive effects irrespective of protected characteristics (shown as "+") and those with specific beneficial effects related to a particular protected characteristic (shown as "++").

### Health, Inclusion and Safety

#### Strategic Policy S1: Healthy and Inclusive City

- 4.3 Strategic Policy S1 supports an inclusive living and working environment, setting out requirements for development to achieve this. The policy is likely to have a positive impact for all, including those with particular protected characteristics, through promoting an inclusive environment and by requiring inclusivity principles to be embedded in the design of buildings and spaces.
- 4.4 The policy considers the provision of training and skills development to facilitate employment, particularly for those in the City and neighbouring boroughs. This will have a beneficial impact for everyone, including those with particular protected characteristics, by increasing opportunities for employment.
- 4.5 The policy supports and encourages the provision of nursery and childcare facilities, which will particularly have a positive impact on those with "Pregnancy and maternity" as a protected characteristic.
- 4.6 The detailed policies under Strategic Policy S1 are assessed below in **Table 4.1**.

Table 4.1 – Strategic Policy S1: Healthy and Inclusive City Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HL1: Inclusive building and spaces	+	+	+	+	+	+	+	+	<p>Policy HL1 requires buildings and spaces to be designed with inclusive principles and promote equity, diversity and social inclusion. This is likely to have a positive impact on everyone and particularly beneficial to people with particular protected characteristics by requiring inclusive principles to be embedded from design stage.</p> <p>The policy requires Equality Impact Assessments to be submitted with major planning applications to demonstrate how this is achieved. This is likely to have a positive impact on equality matters.</p>
Policy HL2: Air Quality	+	+	+	+	+	+	+	+	<p>Policy HL2 sets air quality standards for future developments. This policy will have a beneficial impact for all, including those with particular protected characteristics. Some groups may be particularly sensitive to air quality, therefore this policy is likely to</p>

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									have a positive impact on "Age", "Disability" and "Pregnancy and maternity" protected characteristics.
Policy HL3: Noise	+	+	+	+	+	+	+	+	Policy HL3 sets out noise standards for future developments and the requirement for noise mitigation measures to be implemented during construction. This policy will have a beneficial impact for all, including those with particular protected characteristics. Some groups may be particularly sensitive to noise, therefore this policy is likely to have a positive impact on "Age", "Disability" and "Pregnancy and maternity" protected characteristics.
Policy HL4: Contaminated land and water quality	+	+	+	+	+	+	+	+	Policy HL4 requires site investigations to be carried out to establish land contamination during ground works and creation of open spaces. This policy will have a beneficial impact for all, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HL5: Location and protection of social and community facilities	+	+	+	+	+	+	+	+	Policy HL5 supports the provision of social and community facilities and protects existing infrastructure. Some community uses (for example, places of worship) are used by certain groups with particular protected characteristics. While it is considered that this policy will have a beneficial impact for all, the impact will be disproportionately beneficial to those with particular protected characteristics who might use community facilities that are particular to their protected characteristic.
Policy HL6: Public toilets	+	+	+	+	+	+	+	+	Policy HL6 supports the provision of publicly accessible toilets and free 'Changing Places'. This policy will be beneficial for everyone, and particularly beneficial to those with 'Age', 'Disability', 'Pregnancy and Maternity' and 'Sex' as a protected characteristic.
Policy HL7: Sport and recreation	+	+	+	+	+	+	+	+	Policy HL7 supports the provision of sports facilities and recreation facilities that are accessible to all. This policy

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									will have a beneficial impact for all, including those with particular protected characteristics.
Policy HL8: Play areas and facilities	+	+	+	+	+	+	+	+	Policy HL8 supports the provision of play space facilities. This is likely to have a beneficial impact on all and particularly benefit children and parents, having a differential impact on 'Age' and 'Pregnancy and Maternity'.
Policy HL9: Health Impact Assessment (HIA)	+	+	+	+	+	+	+	+	Policy PH9 requires development to undertake a Health Impact Assessment in line with the adopted City Corporation's Health Impact Assessment guidance note. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.

## Strategic Policy SP2: Safe and Secure City

- 4.7 Strategic Policy S2 supports a secure and safe environment within the City mitigating the potential for crime, the fear of crime, anti-social behaviour and terrorism by requiring development to include design measures which will design-out crime and encourage natural surveillance. This policy will have a beneficial impact for all, and differentially impact those with particular protected characteristics such as women and girls, (Sex), young and older (Age) and disabled people (Disability).
- 4.8 The detailed policies under Strategic Policy S2 are assessed below in **Table 4.2**.

Table 4.2 – Strategic Policy S2: Safe and Secure City Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy SA1: Publicly accessible locations	+	+	+	+	+	+	+	+	Policy SA1 sets out the requirements to address the risk of terrorism in publicly accessible locations. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.
Policy SA2: Dispersal routes	+	+	+	+	+	+	+	+	Policy SA2 requires mitigation measures to be undertaken to reduce over-crowding, noise nuisance and anti-social behaviour in areas with night-time uses. This policy will have a beneficial impact on all, including those with particular protected characteristics. This policy will likely have a differential beneficial impact on groups who are more at risk of during night-time and in big crowds such as women



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									(Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability).
Policy SA3: Designing in Security	+	+	+	+	+	+	+	+	Policy SA3 sets out the security principles to be undertaken in proposals to ensure public safety and that accessibility barriers to the public realm are minimised. This policy will have a beneficial impact for all, but differential impact those with particular protected characteristics such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability), who have a higher risk of threat of feeling unsafe in public spaces or who might experience difficulties in navigating the public realm.

## Housing

### Strategic Policy S3: Housing

- 4.9 Strategic Policy S3 sets out the minimum housing provision for the City of London at a minimum of 1,998 net new homes between 2023/24 and 2039/40. Housing development is encouraged in or near identified residential areas. Affordable housing, co-living, build to rent, hostels, sheltered and extra-care housing should be prioritised. This policy will have a beneficial impact for all, including those with particular protected characteristics.
- 4.10 A minimum provision of 50% affordable housing is expected on public sector land and 35% of private sector land with the potential for 10 or more units. The provision of affordable housing is likely to have a differential impacts on groups who are more vulnerable to changes in housing circumstances such as women (Sex, Pregnancy and maternity), disabled people (Disability), young and old (Age).
- 4.11 The policy requires at least 10% of the new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. This is likely to have a positive differential impact on those with "Disability" as a protected characteristic.
- 4.12 The detailed policies under Strategic Policy S3 are assessed below in **Table 4.3**.

Table 4.3 – Strategic Policy S3: Housing Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HS1: Location of New Housing	+	+	+	+	+	+	+	+	Policy HS1 sets out the principles for choosing a suitable location for housing. This policy will have a beneficial impact for all, including those with particular protected characteristics.
Policy HS2: Loss of housing	+	+	+	+	+	+	+	+	Policy HS2 protects existing housing provision. This policy is likely to have a beneficial impact to all, including those with particular protected characteristics.
Policy HS3: Residential environment	+	+	+	+	+	+	+	+	Policy HS3 protects residential uses from noise disturbance from new development and seeks to ensure privacy for overlooking. This policy will likely have a beneficial impact for all, including those with particular protected characteristics.
Policy HS4: Housing quality standards	+	+	+	+	+	+	+	+	Policy HS4 sets out the housing quality standards for new development to facilitate health and wellbeing of occupants. This policy will likely have a beneficial impact for all, including those with particular protected characteristics.
Policy HS5: Short term residential letting	+	+	+	+	+	+	+	+	Policy HS5 restricts the provision of short term letting to protect the existing housing stock and residents. This policy will likely have a beneficial impact for all,

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									including those with particular protected characteristics.
Policy HS6: Student accommodation and hostels	+	+	+	+	+	+	+	+	Policy HS6 sets out the principles for Purpose-Build Student Accommodation provision. This policy is likely to have a beneficial impact for all and differential beneficial impact on students (Age).
Policy HS7: Older persons housing	+	+	+	+	+	+	+	+	Policy HS7 sets out the principles for older person housing. This policy is likely to have a beneficial impact for all, and is differentially beneficial impact for older people (Age).
Policy HS8: Self and custom housebuilding	+	+	+	+	+	+	+	+	Policy HS8 encourages the provision of self and custom built units. This policy will likely have a beneficial impact for, including those with particular protected characteristics.

## Offices

### Strategic Policy S4: Offices

4.13 Strategic Policy S4 encourages the provision of office floorspace to increase the City's office floorspace stock by a minimum of 1,200,000 m<sup>2</sup> net between 2021 and 2040. New floorspace should be designed to be flexible to allow the transformation and

adaptation of space to support new uses, different layouts and configurations, different types and sizes of occupiers, and to meet the needs of SMEs, start-up companies, creative industries and those requiring move-on accommodation.

- 4.14 Retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation is also encouraged. Where appropriate, the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City is also supported.
- 4.15 This policy supports employment creation and therefore is likely to have a beneficial impact for all, including for those with particular protected characteristics. The detailed policies under Strategic Policy S4 are assessed below in **Table 4.4**.

Table 4.4 – Strategic Policy S4: Offices Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy OF1: Office Development	+	+	+	+	+	+	+	+	Policy OF1 sets out the design standards for office space provision, including the inclusion of design measures which promote health and wellbeing. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy OF2: Protection of Existing Office Floorspace	+	+	+	+	+	+	+	+	Policy OF2 sets out principles to protect existing office floorspace. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy OF3: Temporary 'Meanwhile' Uses	+	+	+	+	+	+	+	+	Policy OF3 sets out the principles when temporary uses are encouraged. Meanwhile uses promote social cohesion and inclusion, and activate construction

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									spaces, contributing to a sense of safety. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

## Retail

### Strategic Policy S5: Retail and Active Frontages

- 4.16 Strategic Policy S5 encourages the provision of a greater mix of retail, leisure, entertainment, experience, culture and other appropriate uses across the City. The quantity and quality of retailing and the retail environment is particularly promoted across City’s four Principal Shopping Centres. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
- 4.17 The detailed policies under Strategic Policy S5 are assessed below in **Table 4.5**.

Table 4.5 – Strategic Policy S5: Retail and active frontages Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy RE1: Principal Shopping Centres	+	+	+	+	+	+	+	+	Policy RE1 protects existing Principal Shopping Centres and active frontages. This is likely to have a beneficial impact for all, including those with particular protected characteristics. Active frontages contribute to personal perception of safety. Therefore, this policy will likely have a differential beneficial impact on groups who are more likely to feel unsafe in public spaces such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability).
Policy RE2: Active Frontages	+	+	+	+	+	+	+	+	Policy RE2 encourages the provision of active frontages at ground floor levels. This is likely to have a beneficial impact for all, including those with particular protected characteristics. Active frontages contribute to personal perception of safety. Therefore, this policy will likely have a differential beneficial impact on groups who are more likely to feel unsafe in public spaces such as women (Sex), young and older (Age) and disabled people (Disability).



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy RE3: Specialist Retail Uses and Clusters	+	+	+	+	+	+	+	+	Policy RE3 supports retail uses and clusters in areas that are culturally and historically significant. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy RE4: Markets	+	+	+	+	+	+	+	+	Policy RE4 supports the provision of temporary markets and retail pop-ups to enhance the vitality of existing retail centres. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

## Culture and Visitors

### Strategic Policy S6: Culture and Visitors

4.18 Strategic Policy S6 encourages the enhancement of the cultural offer, visitor experiences and infrastructure, and the City's evening and weekend economy to support a vibrant environment. This will contribute to creating a sense of social cohesion and providing means for interaction. This is likely to have a beneficial impact for all, including those with particular protected characteristics.

4.19 The detailed policies under Strategic Policy S6 are assessed below in **Table 4.6**.

Table 4.6 - Strategic Policy S6: Culture and Visitors Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	+	+	+	+	+	+	+	+	Policy CV1 protects existing visitor, arts and cultural facilities. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV2: Provision of Arts, Culture and Leisure Facilities	+	+	+	+	+	+	+	+	Policy CV2 encourages the provision of new visitor, arts and cultural facilities to encourage visitor to the City. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV3: Provision of Visitor Facilities	+	+	+	+	+	+	+	+	Policy CV3 encourages the provision of facilities that meet the needs of visitors in new cultural developments, including children's play areas, seating, accessible toilets and well-designed signage. Whilst this is likely to have a beneficial impact for all, including those with particular protected characteristics, it is likely to have a differential beneficial impact for children (Age), people with a disability and the elderly who may require seating (Disability), people with prams (Pregnancy and Maternity) and those with visual impairment (Disability).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CV4: Hotels	+	+	+	+	+	+	+	+	Policy CV4 sets out the principles where hotels and visitor accommodation are permitted. This is likely to have a beneficial impact for all, including those with particular protected characteristics.
Policy CV5: Evening and Night-Time Economy	+	+	+	+	+	+	+	+	Policy CV5 sets out the principles where evening and night-time economy uses can be provided to minimise the impact on residential uses. This is likely to have a beneficial impact for all.
Policy CV6: Public Art	+	++	+	++	++	++	+	+	Policy CV6 supports the provision of public art to enhance local identity. The policy requires that the location must take in consideration pedestrian safety, particularly disabled people. This is likely to have a beneficial impact for all, and a differential beneficial impact for disabled people (Disability). The policy aspires to provide inclusive and diverse artworks. This is likely to have a differential beneficial impact on those with "Race", "Religion and belief" and "Sex" as a protected characteristic by diversifying the art offer.

## Infrastructure

### Strategic Policy S7: Infrastructure and Utilities

- 4.20 SP7 ensures the new development facilitates the transition towards a zero carbon and climate resilient city. This is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.21 The detailed policies under Strategic Policy S7 are assessed below in **Table 4.7**.

Table 4.7 – Strategic Policy S7: Infrastructure and Utilities Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy IN1: Infrastructure provision and connection	+	+	+	+	+	+	+	+	Policy IN1 sets out the infrastructure requirements. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy IN2: Infrastructure Capacity	+	+	+	+	+	+	+	+	Policy IN2 sets out the infrastructure capacity requirements. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy IN3: Pipe Subways	+	+	+	+	+	+	+	+	Policy IN3 requires developments to use pipe subway routes where these are available. This is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to have a

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									differential positive effect on those with reduced mobility as it would improve pedestrian accessibility, and therefore impact those with "Age", "Disability" and "Pregnancy and maternity" as a protected characteristic.

## Design

### Strategic Policy S8: Design

- 4.22 Strategic Policy S8 sets out the requirements for sustainable design in new developments to build a net zero carbon City. The policy aims to secure vibrancy, inclusion and wellbeing through design measures that support a mix of uses and place people at the heart of the design.
- 4.23 The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity, this policy is likely to have a especially beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups have during the design process of spaces and requires the anticipation their uses.
- 4.24 The detailed policies under Strategic Policy S8 are assessed below in **Table 4.8**.

Table 4.8 – Strategic Policy S8: Design Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy DE1: Sustainable Design	+	+	+	+	+	+	+	+	Policy DE1 states that development should take a retrofit first approach to existing buildings and support the most sustainable and suitable approach for the Site. The policy supports circular economy design measures and commitments to sustainability standards. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE2: Design Quality	++	++	++	++	++	++	++	++	Policy DE2 sets out the design standards for new development, including the requirement to enhance pedestrian permeability and to ensure that buildings and public spaces are inclusive and accessible for everyone. The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity of building design, this policy is likely to have a differential beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups could have during the design process.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy DE3: Public Realm	+	+	+	+	+	+	+	+	Policy DE3 requires development to provide high quality, inclusive, welcoming, well designed, safe and functional public realm. The policy is likely to have a beneficial impact for everyone, including those with particular protected characteristics. By focusing on inclusivity of the public realm, this policy is likely to have a differential beneficial impact on those with particular protected characteristics as it supports the consideration of specific needs these groups could have during the design process.
Policy DE4: Terraces and Elevated Public Spaces	+	+	+	+	+	+	+	+	Policy DE4 requires all tall buildings and major developments to provide free-to-enter, publicly accessible elevated spaces, such as roof gardens. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE5: Shopfronts	+	+	+	+	+	+	+	+	Policy DE5 requires shopfronts to be designed at a high standard and promote active frontages. This is likely to be beneficial for everyone, including those with particular protected characteristics. The requirement to provide accessible entrance is likely to have a differential impact those with "Age", "Disability", and



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									"Pregnancy and maternity" as a protected characteristic.
Policy DE6: Advertisements	+	+	+	+	+	+	+	+	Policy DE6 sets out the conditions for advertising displays. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy DE7: Daylight and sunlight	+	+	+	+	+	+	+	+	Policy DE7 requires development to demonstrate appropriate daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces. This is likely to be beneficial for everyone, including those with particular protected characteristics but will likely have a differential beneficial effect on 'Age', 'Disability', 'Pregnancy and Maternity' and 'Religion or Belief'.
Policy DE8: Lighting	+	+	+	+	+	+	+	+	Policy DE8 sets out the requirements for internal and external lighting design. Improvements to the outdoor lighting conditions will also improve the safety and accessibility of public spaces. This policy will have a

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									beneficial impact for all, but differential impact those with particular protected characteristics such as women (Sex), young and older (Age), those who belong to a certain ethnic group or religion (Race, Religion or belief), LGBT groups (Sexual orientation & gender reassignment) and disabled people (Disability), who may have a higher risk of threat of feeling unsafe in public spaces

## Transport

### Strategic Policy S9: Transport and Servicing

4.25 Strategic Policy S9 sets out how transport infrastructure will be maintained and improved, including promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations, and river piers. This is likely to be beneficial for everyone, including those with particular protected characteristics. Improvements to accessibility will likely have a beneficial differential effect on those with restricted mobility (“Age”, “Disability” and “Pregnancy and Maternity”).

4.26 The detailed policies under Strategic Policy S9 are assessed below in **Table 4.9**.

Table 4.9 – Strategic Policy S9: Transport and Servicing Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy VT1: The Impacts of Development on Transport	+	+	+	+	+	+	+	+	Policy VT1 sets out the requirement to mitigate identified negative impacts on transport as a result of development. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT2: Freight and Servicing	+	+	+	+	+	+	+	+	Policy VT2 sets out the requirements to mitigate freight and servicing trips as a result of development. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT3: Vehicle Parking	+	++	+	+	+	+	+	+	Policy VT3 sets out the requirement for car-free developments with the exception of designated Blue Badge parking. This is likely to be beneficial for everyone, including those with particular protected characteristics, but will be particularly beneficial for those with 'Disability' as a protected characteristic.
Policy VT4: River Transport	+	+	+	+	+	+	+	+	Policy VT4 sets out the ambition to improve the riverside and the associated infrastructure. This is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy VT5: Aviation landing facilities	+	+	+	+	+	+	+	+	Policy VT5 forbids heliports in the City and allows for helipads where they are essential for emergency or

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									security purposes. This is likely to be beneficial for everyone, including those with particular protected characteristics.

Strategic Policy S10: Active Travel and Healthy Streets

- 4.27 Strategic Policy S10 sets out the requirement to improve the quality and permeability of the public realm to enhance inclusivity and accessibility. The policy gives great consideration to the needs of wheelchair and disabled users. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to be particularly beneficial for those with "Age", "Disability" and "Pregnancy and Maternity" as a protected characteristic as it requires inclusive design.
- 4.28 The detailed policies under Strategic Policy S10 are assessed below in **Table 4.10**.

Table 4.10 – Strategic Policy S10: Active Travel and Healthy Streets Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	+	+	+	+	+	+	+	+	Policy AT1 sets out the requirement for development to contribute to the improvement of pedestrian permeability. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy is likely to be differentially beneficial for those with "Age", "Disability" and "Pregnancy and Maternity" as a protected characteristic as it requires an inclusive design of the public realm.
Policy AT2: Active Travel including Cycling	+	+	+	+	+	+	+	+	Policy AT2 sets out the requirement for developments to encourage active travel. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy requires suitable access to be delivered from pedestrian routes to accommodate to all mobility needs and therefore it is likely to be differentially beneficial to those with "Disability" as a protected characteristic.
Policy AT3: Cycle Parking	+	+	+	+	+	+	+	+	Policy AT3 sets out the requirement for developments to provide cycle parking spaces. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

# Heritage and Tall Buildings

## Strategic Policy S11: Historic Environment

4.29 Strategic Policy S11 sets out the vision for heritage-led regeneration which brings wider social, cultural, economic and environmental benefits. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

4.30 The detailed policies under Strategic Policy S11 are assessed below in **Table 4.11**.

Table 4.11 – Strategic Policy S11: Historic Environment Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy HE1: Managing Change to the Historic Environment	+	+	+	++	++	+	+	+	Policy HE1 sets out the conditions to be considered when developing heritage assets. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. A large majority of City's historic buildings are places of worship. The policy specifically safeguards the space around Bevis Marks Synagogue in order to preserve or enhance, where possible, the elements that contribute to its setting. By considering the impact on places of worship in the City, this policy is likely to have a beneficial impact on

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Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									those with "Race" and "Religion and belief" as protected characteristics.
Policy HE2: Ancient Monuments and Archaeology	+	+	+	+	+	+	+	+	Policy HE2 sets out the requirement to protect sites with archaeological potential and ancient monuments. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy HE3: Setting of the Tower of London World Heritage Site	+	+	+	+	+	+	+	+	Policy HE3 sets out the requirement to protect the Tower of London World Heritage Site. The Tower of London World Heritage Site. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

### Strategic Policy S12: Tall Buildings

- 4.31 Strategic Policy S12 sets out the considerations that need to be taken into account when building tall buildings (having a height of over 75m) in order to protect the City skyline and ensure quality of the design. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.



Strategic Policy S13: Protected Views

4.32 Strategic Policy S13 sets out the requirement to protect and enhance significant City and London view of important buildings, townscape and skylines. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure

4.33 Strategic Policy S14 sets out the ambition to provide a greener City by protecting and enhancing existing open spaces and providing new green infrastructure. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

4.34 The detailed policies under Strategic Policy S14 are assessed below in **Table 4.12**.

Table 4.12 – Strategic Policy S14: Open Spaces and Green Infrastructure Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy OS1: Protection and provision of open space	+	+	+	+	+	+	+	+	Policy OS1 sets out the requirements to protect existing publicly accessible open spaces and increase the provision through development. The policy requires open spaces to be designed for all communities in the City and to be free, accessible, welcoming and inclusive. This policy is likely to be beneficial for

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									everyone, and it is likely to have a differential beneficial impact on those with particular protected characteristics by ensuring spaces are inclusive and accessible.
Policy OS2: Urban Greening	+	+	+	+	+	+	+	+	Policy OS2 requires that the provision of urban greening should be integral to the design and layout of buildings, delivering an Urban Greening Factor of 0.3 as a minimum. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS3: Biodiversity	+	+	+	+	+	+	+	+	Policy OS3 requires development to incorporate measures that enhance biodiversity. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS4: Biodiversity Net Gain	+	+	+	+	+	+	+	+	Policy OS4 sets out the requirement for major developments to deliver Biodiversity Net Gain to conserve and enhance biodiversity. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy OS5: Trees	+	+	+	+	+	+	+	+	Policy OS5 sets out the ambition to increase the number of trees and their overall canopy in the City. The policy is likely to be beneficial for everyone,

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									including those with particular protected characteristics.

### Climate Resilience

#### Strategic Policy S15: Climate Resilience and Flood Risk

- 4.35 Strategic Policy S15 sets out the requirement for Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.36 The detailed policies under Strategic Policy S15 are assessed below in **Table 4.13**.

Table 4.13 – Strategic Policy S15: Climate Resilience and Flood Risk Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CR1: Overheating and Urban Heat Island Effect	+	+	+	+	+	+	+	+	Policy CR1 sets out the requirement to demonstrate that their developments have been designed to reduce the risk of overheating through design. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The very young and old are more likely to have a health risk due to overheating, therefore the policy is likely to have a differential positive impact on those with "Age" as a protected characteristic.
Policy CR2: Flood Risk	+	+	+	+	+	+	+	+	Policy CR2 sets out the requirement for developments to consider flood risk. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy CR3: Sustainable drainage systems (SuDS)	+	+	+	+	+	+	+	+	Policy CR3 sets out the requirement for all development, transportation and public realm proposals to consider SuDs principles in the design of the schemes. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CR4: Flood protection and flood defences	+	+	+	+	+	+	+	+	Policy CR4 sets out the requirement for development to protect and enhance where possible the effectiveness of structures intended to minimise flood risk. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Strategic Policy S16: Circular Economy and Waste

- 4.37 Strategic Policy S16 sets out the vision for City Corporation to support businesses and residents moving towards a Zero Waste City. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
- 4.38 The detailed policies under Strategic Policy S16 are assessed below in **Table 4.14**.

Table 4.14 – Strategic Policy S16: Circular Economy and Waste Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy CE1: Sustainable Waste Facilities and Transport	+	+	+	+	+	+	+	+	Policy CE1 requires all development proposals to incorporate waste facilities. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Policy CE2: New waste management sites	+	+	+	+	+	+	+	+	Policy CE2 sets out the design and management requirements for new facilities for waste management, handling and transfer. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

The Temples, the Thames Policy Area and the Key Areas of Change

- 4.39 The following section presents an assessment for Strategic Strategies that refer to a spatial area within the City. The assessment is presented in **Table 4.15**.

Table 4.15 – Spatial Strategic Policies Assessment

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Policy TP1: The Temples	+	+	+	+	+	+	+	+	Policy TP1 sets out the ambition for the City Corporation to continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy also supports improvements to accessibility within buildings and therefore it is likely to have a differential positive effect on those with "Disability" as a protected characteristic.
Strategic Policy S17: Thames Policy Area	+	+	+	+	+	+	+	+	Strategic Policy S17 sets the requirement to enhance the unique character of the City riverside for transport and recreation. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. The policy requires improvements to the pedestrian routes by widening the riverside walk which is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristics).



Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Strategic Policy S18: Blackfriars	+	+	+	+	+	+	+	+	<p>Strategic Policy S18 sets out the requirements to enhance the character and amenities of the Blackfriars Key Area of Change, including supporting redevelopment and refurbishment of existing post-war buildings and enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside.</p> <p>The policy is likely to be beneficial for everyone, including those with particular protected characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristics).</p>
Strategic Policy S19: Pool of London	+	+	+	+	+	+	+	+	<p>Strategic Policy S19 sets out the requirement to refurbish and redevelop the building stock and public realm around the Pool of London Key Area of Change to contribute to a vibrant, welcoming and accessible environment.</p> <p>The policy is likely to be beneficial for everyone, including those with particular protected</p>

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristic).
Strategic Policy S20: Aldgate, Tower and Portsoken	+	+	+	+	+	+	+	+	Strategic Policy S20 sets out the strategic vision of Aldgate, Tower and Portsoken Key Area of Change to provide a mixed-use area that supports commercial, residential, education and hotel uses. The policy also supports enhancing the public realm and open spaces in various area by improving permeability. The policy is likely to be beneficial for everyone, including those with particular protected characteristics. By delivering improvements to the accessibility of buildings and public spaces, the policy is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy of Maternity" as a protected characteristic).

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
Strategic Policy S21: City Cluster	+	+	+	+	+	+	+	+	<p>Strategic Policy S21 sets out the strategic vision for the City Cluster Key Area of Change to accommodate significant growth in the office floorspace and complementary land uses to support employment growth. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.</p> <p>The policy safeguards the immediate settings of Bevis Marks Synagogue to protect and enhance the historical elements of the Synagogue. This is likely to be particularly beneficial for users of the Synagogue, therefore impact the "Religion or belief" and "Race" protected characteristic.</p> <p>The policy also requires the improvement of streets, spaces and the public realm to improve connectivity and accessibility. This is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy or Maternity" as a protected characteristic).</p>
Strategic Policy S22: Fleet Street and Ludgate	+	+	+	+	+	+	+	+	Strategic Policy S22 sets out the strategic vision for the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related businesses a royal and

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									state processional route and a Principal Shopping Centre. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S23: Smithfield and Barbican	+	+	+	+	+	+	+	+	Strategic Policy S23 sets out the strategic vision to improve the Smithfield and Barbican Area and encourage culture-led mixed use development to complement existing uses. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S24: Smithfield	+	+	+	+	+	+	+	+	Strategic Policy S24 sets out the strategic vision to protect and enhance the mixed-use historic character of Smithfield. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.
Strategic Policy S24: Liverpool Street	+	+	+	+	+	+	+	+	Strategic Policy S25 sets out the strategic vision for Moorgate-Liverpool Street Area to support the development of flexible office space, additional retail and leisure opportunities to establish a destination area. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

Local Plan Strategic Policy	Protected Characteristics								Comments
	Age	Disability	Pregnancy & Maternity	Race	Religion or belief	Sex	Sexual Orientation & Gender reassignment	Marriage & Civil Partnership	
									The policy also supports improved wayfinding, pedestrian connection, improved pedestrian routes in and around bus stations, provision of seating and overall improvements to the accessibility and capacity of Liverpool Street Station. This is likely to have a differential beneficial impact on those with restricted mobility ("Age", "Disability" and "Pregnancy or Maternity" as a protected characteristic).

### Implementation

#### Strategic Policy S26: Planning Contributions

4.40 Strategic Policy S26 sets out the conditions for seeing appropriate contributions from developers to manage and mitigate the impact of development through the Community Infrastructure Levy and Section 106 planning obligations. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

#### Strategic Policy PC1: Viability Assessment

4.41 Policy PC1 requires development proposals to carry out viability assessments to demonstrate the financial viability of the scheme. The policy is likely to be beneficial for everyone, including those with particular protected characteristics.

# Appendix 1 – Baseline Data

Measure		Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London
Resident Population (Census 2021)										
<i>Total Population</i>										
Population 2011 Census		220,300	246,270	206,125	303,086	206,125	254,096	8,170,000	<b>7,375</b>	8,170,000
Population 2021 Census		8,600	259,148	216,587	317,662	216,587	310,303	8,800,000	<b>8,583</b>	8,800,000
Population Growth		16%	5%	5%	5%	5%	22%	8%	<b>16%</b>	8%
<i>Age</i>										
Age Structure 2021 Census	Aged 0-15	15%	19%	15%	15%	17%	19%	13%	<b>7%</b>	19%
	Aged 16-74	79%	78%	81%	81%	80%	79%	81%	<b>87%</b>	75%
	Aged 75+	5%	3%	4%	4%	3%	2%	5%	<b>6%</b>	5%
<i>Sex</i>										
Male/ Female		55%/ 45%	49%/ 51%	52%/48%	52%/48%	52%/48%	50%/50%	49%/ 51%	<b>55%/ 45%</b>	49%/51%
<i>Marriage and Civil Partnership Status</i>										
Never married and never registered a civil partnership		56%	60%	62%	62%	60%	58%	54%	<b>57%</b>	46%
Married		31%	27%	25%	25%	26%	32%	32%	<b>29%</b>	40%
In a registered civil partnership		1%	0%	1%	1%	1%	0%	0%	<b>1%</b>	0%
Separated, but still legally married or still legally in a civil partnership		2%	3%	2%	3%	3%	2%	2%	<b>2%</b>	2%

Measure	Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London	
Divorced or civil partnership dissolved	7%	7%	7%	7%	7%	5%	8%	<b>7%</b>	7%	
Widowed or surviving civil partnership partner	3%	3%	3%	3%	3%	3%	3%	<b>3%</b>	4%	
<i>Gender Reassignment</i>										
Gender identity different from the one registered at birth	0.8%	1.1%	0.9%	0.9%	1.2%	1.0%	0.7%	<b>0.5%</b>	0.9%	
Not Answered	8%	10%	7%	7%	7%	8%	9%	<b>7%</b>	8%	
<i>Sexual Orientation</i>										
Gay, Lesbian or Bisexual	6%	7%	7%	8%	7%	6%	5%	<b>10%</b>	4%	
Not Answered	11%	13%	10%	9%	9%	10%	11%	<b>10%</b>	10%	
<i>Pregnancy and Maternity</i>										
General Fertility Rate	40.6	54.4	42.4	40.0	42.0	45.9	39.1	<b>27.7</b>	52.9	
<i>Race</i>										
Ethnicity	White	60%	53%	62%	55%	51%	39%	55%	<b>65%</b>	54%
	Mixed/Multiple	7%	7%	7%	8%	7%	5%	7%	<b>5%</b>	6%
	Asian/Asian British	18%	10%	10%	7%	10%	44%	17%	<b>17%</b>	21%
	Black/Black British	9%	21%	13%	24%	25%	7%	8%	<b>3%</b>	14%
	Other	7%	9%	7%	6%	6%	4%	13%	<b>6%</b>	6%
Place of Birth	UK	55%	60%	60%	61%	59%	53%	44%	<b>50%</b>	59%
	Europe (excluding UK)	18%	17%	18%	15%	14%	16%	23%	<b>22%</b>	16%
	Africa	6%	8%	6%	9%	11%	4%	7%	<b>4%</b>	7%



Measure		Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London
	Middle East and Asia	14%	7%	7%	5%	7%	22%	17%	<b>14%</b>	13%
	Americas and Caribbean	6%	7%	6%	9%	8%	4%	7%	<b>7%</b>	4%
	Antarctica and Oceania	1%	2%	2%	1%	1%	1%	1%	<b>2%</b>	1%
Main Languages	English	79%	80%	81%	82%	82%	73%	74%	<b>78%</b>	78%
	European (EU)	10%	9%	10%	12%	11%	10%	13%	<b>13%</b>	10%
	European (Non-EU)	2%	5%	3%	1%	1%	1%	3%	<b>2%</b>	2%
	South Asian	2%	2%	1%	1%	1%	12%	2%	<b>1%</b>	6%
	East Asian	3%	1%	2%	1%	2%	2%	3%	<b>4%</b>	1%
	African	1%	1%	2%	2%	2%	1%	1%	<b>0%</b>	1%
	West/Central Asian	1%	1%	1%	0%	1%	0%	2%	<b>0%</b>	1%
	Other	0%	0%	0%	0%	0%	0%	0%	<b>1%</b>	1%
<i>Religion and Belief</i>										
Christian		31%	31%	35%	44%	43%	22%	37%	<b>35%</b>	41%
Buddhist		1%	1%	1%	1%	1%	1%	1%	<b>1%</b>	1%
Hindu		2%	1%	1%	1%	1%	2%	2%	<b>2%</b>	5%
Jewish		5%	7%	1%	0%	0%	0%	3%	<b>2%</b>	2%
Muslim (Islam)		16%	13%	12%	8%	10%	40%	20%	<b>6%</b>	15%
Sikh		0%	1%	0%	0%	0%	0%	0%	<b>0%</b>	2%
Other religion		1%	2%	1%	1%	1%	1%	1%	<b>1%</b>	1%
No religion		35%	36%	41%	38%	36%	27%	26%	<b>44%</b>	27%
Not Answered		9%	9%	8%	8%	7%	7%	9%	<b>9%</b>	41%

Measure		Camden	Hackney	Islington	Lambeth	Southwark	Tower Hamlets	Westminster	CoL	London
<i>Health and Disability</i>										
Self-Assessed Health	Very good & Good	85%	85%	84%	86%	86%	85%	85%	<b>89%</b>	85%
	Fair	10%	10%	10%	10%	10%	10%	10%	<b>8%</b>	10%
	Bad & Very Bad	5%	5%	6%	4%	4%	5%	5%	<b>3%</b>	4%
Disability under the Equality Act	Day-to-day activities limited a lot	7%	6%	7%	5%	6%	6%	6%	<b>3%</b>	6%
	Day-to-day activities limited a little	8%	8%	9%	8%	8%	7%	7%	<b>7%</b>	7%
<b>Workday Population (Annual Population Survey, July 2022 to June 2023)</b>										
<b>Total Workday Population</b>		<b>191,000</b>	<b>129,000</b>	<b>144,000</b>	<b>172,000</b>	<b>381,000</b>	<b>223,000</b>	<b>374,000</b>	<b>770,000</b>	5,040,000
Sex	Female	52%	43%	44%	45%	41%	43%	42%	<b>39%</b>	46%
	Male	48%	57%	56%	55%	59%	57%	58%	<b>61%</b>	54%
Age	Aged 16 – 19	2%	n/a	1%	n/a	1%	2%	2%	<b>2%</b>	1%
	Aged 20 – 24	3%	10%	7%	5%	9%	8%	6%	<b>7%</b>	7%
	Aged 25 - 49	62%	63%	73%	71%	66%	72%	72%	<b>70%</b>	68%
	Aged 50 +	38%	29%	22%	27%	26%	21%	21%	<b>22%</b>	27%

21 Soho Square  
London  
W1D 3QP

0203 597 1000  
hello@quod.com



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<b>Committee(s)</b>	<b>Dated:</b>
Planning and Transportation Committee	31/01/2024
<b>Subject:</b> City Plan 2040	<b>Public</b>

Representations

Representations have been received in relation to Item 5 (City Plan 2040) from following organisations: the City Property Association, Bevis Marks Synagogue, 20 Gracechurch Street and SAVE Britain's Heritage. The representations are set out below.

REDACTED  
Planning and Development Director  
Department of the Built Environment  
City of London Corporation  
London EC2P 2EJ

**By email only: REDACTED**

30 January 2024

**RE: Updated City Plan 2040 and engagement**

Dear REDACTED,

I am writing on behalf of the City Property Association (CPA), the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. A list of the 150+ member companies we represent can be viewed [here](#).

We are aware that in the forthcoming Planning & Transportation Committee meeting on 31 January, Members will decide whether to consult on the updated draft of the City Plan 2040. CPA welcomes the opportunity to review the proposed updated draft Plan and fully engage with the City Corporation accordingly. On behalf of our members, we look forward to reviewing the draft Plan as part of the formal Regulation 19 consultation and providing comments and feedback, as part of a transparent and equitable process for all interested parties in accordance with national policy.

It is clear from the City Corporation's recent report [Future of Office Use](#) that the City Cluster and Key Areas of Change have an important role to play in accommodating further jobs and demographic growth that will in turn generate economic and social prosperity. Policies to support this will be critically important going forward, including enabling the further densification of the area. Not only is this a more sustainable approach to the delivery of new uses but the City's limited and narrow geographical area means that this is likely to be required and should be supported if the City of London is to continue to uphold its unique and unrivalled contribution to the UK's economy.

I would be happy to discuss any of the points raised in our letter and look forward to working with you and your colleagues on the City Plan 2040 going forward during the formal Regulation 19 consultation process.

Yours faithfully,

REDACTED

**REDACTED / Chief Executive**  
**City Property Association**

REDACTED

**From:** REDACTED

**Sent:** Tuesday, January 30, 2024 2:30:00 PM

**To:** REDACTED

**Subject:** Please Protect Bevis Marks Synagogue

Dear REDACTED,

I hope this message finds you well.

I'm writing to you ahead of this Wednesday's P&T committee meeting where you will be asked to approve the draft local plan and send it to consultation. Unfortunately, the draft contains several policies that seem intentionally crafted to undermine Bevis Marks Synagogue's planning protections, just weeks after you approved a new Conservation Area to preserve it! In fact, the owners of 31 Bury st to our immediate south have curiously now submitted a new proposal for a very tall building, despite your committee's refusal of a similar one just a few years ago.

---

It is important that these new policies are not allowed to remain into the consultation phase where they will begin to gain weight. We are therefore asking that you support/ put forward a measure to make three reasonable and necessary amendments to it first.

1. To preserve the synagogue's sky-view backdrop
2. To include the synagogue's entire block in its immediate setting.
3. To retain the previous local plan's policy to prohibit tall buildings in Conservation Areas.

Attached you will find a short policy paper which explains all of this more fully. Please let me know if you have any questions or which to discuss further.

Thank you for your support in protecting Bevis Marks Synagogue.

Best,

REDACTED



## BEVIS MARKS SYNAGOGUE

### Protecting a major heritage and cultural asset through the City Plan 2040

#### BRIEFING FOR MEMBERS OF THE PLANNING & TRANSPORTATION COMMITTEE

##### Important amendment to the draft City Plan

The proposed drafting of new Local Plan seeks to limit the duty to preserve or enhance the setting of the Grade 1 Listed Synagogue only to its "immediate" setting. The statutory provisions, however, provide that local planning authorities are under a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area as a whole. The policy therefore is at odds with the statutory requirements imposed upon the City of London.

The Synagogue calls on Planning & Transportation Committee members to require this very unsatisfactory situation to be corrected before the draft Plan goes out to consultation.

As a minimum, Policy HE1 should be amended at point 9 to read "*Development in the defined immediate setting of Bevis Marks Synagogue and The Monument and development that affects their wider setting (including views out and in) should preserve and where possible enhance the elements that contribute to the significance of their setting.*"

This should be accompanied by an amendment to the map at Appendix 4 to show the protected view from the Synagogue in exactly the same way as has already been done for the Monument. The amended map should look approximately like this, where the red dashed line defines the "immediate setting" and the blue lines show the extent of the sky view which is a fundamental part of the wider setting:



It would be desirable to make consequential amendments to other text within the Plan, but the above are the important ones, and are straightforward amendments Committee members could resolve to have made at the 31 January meeting without affecting the consultation timetable.

A further amendment, which would be welcomed throughout the heritage sector, would be to reintroduce the sentiment from the existing Local Plan that "*planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map*" will be refused. However, a reference to "**Bevis Marks Synagogue**" should be added next to the wording about The Monument. It may be said by officers that this statement would sit uncomfortably with the Mayor's requirement

for the Plan to plan specifically for where tall buildings will be permitted. However, there is no inconsistency between what the Mayor requires and the statement set out above.

## Background

Corporation members will be aware of the considerable feeling about the need to protect this unique Grade 1 Listed building which is to the Jewish community the equivalent of St Paul's Cathedral.

What remains of its sky view was threatened with obliteration by proposals for tall office towers at 31 Bury Street and 33 Creechurch in 2021. There was an unprecedented outpouring of protest from influential figures across the world and from Historic England and national heritage organisations. To its immense credit, the Planning & Transportation Committee decided to refuse 31 Bury Street, and the application for 33 Creechurch was withdrawn.



## The draft City Plan 2040

There have been discussions since about how the Synagogue's setting can be effectively protected by the planning system. This has led recently to the designation of the Creechurch Conservation Area, which is very welcome.

However, that positive step now stands to be undermined by the contents of the draft Reg. 19 City Plan 2040 ([draft City Plan 2040](#)).

The draft CP 2040 contains a policy (HE1) to "*conserve and enhance the immediate setting*" of the Synagogue, which is of course welcome. However, the "*immediate setting*" is very tightly drawn, and there is no policy protection for the wider setting, which is just as important to the heritage significance of the building. What remains of the sky view is of great intangible value, being of great religious and cultural importance. This is explained eloquently in the following paper by Professor Green of the University of Oxford: [Professor Green's paper](#).

Not only is there no policy protection for the wider setting, but the policy in the existing City Plan (CS14) is that tall buildings have no place in Conservation Areas. This policy is, without explanation, dropped in the draft new CP.

The treatment of the Synagogue is in marked contrast to the treatment of The Monument. The two are frequently bracketed as buildings of comparable historic and cultural importance. Yet The Monument has protected views in and out, whereas the Synagogue is granted no such protection.

The Synagogue's representatives have had discussions with officers about the situation, but it has not led to the draft Plan being amended.

## BEVIS MARKS SYNAGOGUE

### Protecting a major heritage and cultural asset through the City Plan 2040

#### BRIEFING FOR MEMBERS OF THE PLANNING & TRANSPORTATION COMMITTEE

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The Synagogue's representatives have had discussions with officers about the situation, but it has not led to the draft Plan being amended.

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**From:** REDACTED

**Sent:** Friday, January 26, 2024 2:54 PM

**To:** REDACTED; REDACTED; REDACTED

**Cc:** REDACTED

**Subject:** 20 Gracechurch Street

Dear REDACTED, REDACTED, REDACTED,

Thank you for your time on Tuesday. I attach the design presentation which has now been updated to include overlays of the existing building as you requested.

We hope the presentation served to illustrate the site's abundant potential and we look forward to developing our ideas further in due course, reflecting your constructive feedback.

With the right design, we are confident 20 Gracechurch Street can make a far greater contribution to the Square Mile than it does in its present form; enhancing the public realm around a key junction, supporting Destination City, delivering high-quality, flexible floorspace and introducing architecture that justifies its prominence on the western aspect of the City Cluster.

At this stage, and with the City Plan's Reg. 19 consultation approaching, our focus remains to ensure that we can work collaboratively to realise those opportunities within an appropriate and robust policy framework.

In that regard, and notwithstanding the significant weight that would be attached to the existence of a tall building on the site as a material consideration, we would encourage you to recognise the site's potential through inclusion in the City Cluster Tall Buildings Area. Without an amendment, when the site comes forward, it will constitute development of a tall building to be assessed against Policy D9 of the London Plan, which states that: 'tall buildings should only be developed in locations that are identified as suitable in Development Plans'.

Redevelopment of the site will further engage consideration of Historic England Advice Note 4: Tall Buildings (2022) - referenced extensively in the City's Tall Buildings Topic Paper – which states that: 'the presence of an existing tall building that has been proven to have harmful impacts will not necessarily justify its replacement with a new tall building of the same or greater scale.'  
(HEAN 4, para. 4.1)

As you will be aware, recent statutory amendments to Section 38 of the PCPA 2004 promise an even greater emphasis on the primacy of the development plan moving forward, reinforcing the importance of a plan-led approach to tall buildings advocated by the London Plan and HEAN 4. As



this site is contiguous with the draft tall buildings area and respects each of the 'Select Criteria' which informed initial modelling, we do believe an amendment would be the most logical step to bring clarity to future development of this key site and the City Cluster as a whole.

We would of course welcome your considered view on this suggestion, once you have had an opportunity to reflect further on Tuesday's presentation and the matters we discussed. In the meantime, if you require any further background information or material in relation to the site, please do not hesitate to contact me. We would be happy to talk through the policy position with REDACTED if helpful.

Kind regards,

REDACTED

Partner

Tel. REDACTED  
Mobile. REDACTED  
REDACTED

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**From:** REDACTED

**Sent:** Tuesday, January 30, 2024 5:06 PM

**To:** REDACTED emails

**Subject:** City Plan 2040 amendments

THIS IS AN EXTERNAL EMAIL

Dear Members of the Planning & Transportation Committee,

Please find attached a letter on behalf of SAVE Britain's Heritage setting out our comments and concerns regarding the draft City Plan 2040 amendments set to be debated by the committee when it meets tomorrow morning, 31<sup>st</sup> January 2024.

I would be happy to answer any queries you may have in the meantime, and we welcome the City of London's ongoing work to preserve and enhance its unique heritage in the emerging City Plan.

Yours sincerely,

**REDACTED**

Senior Conservation Officer



REDACTED

Tel: REDACTED

Be our Friend and enjoy the benefits for just £36 a year by clicking [here](#).

[www.savebritainsheritage.org](http://www.savebritainsheritage.org)

@SAVEBrit

Members of the Planning & Transportation Committee  
City of London Corporation  
PO Box 270,  
Guildhall,  
London EC2P 2EJ

**By email**

Our reference: 24016

30<sup>th</sup> January 2024

Dear Members of the Planning & Transportation Committee,

**Amendments proposed to the City Plan 2040 – 31 January 2024**

Following consideration of the, SAVE Britain's Heritage writes to offer comments on the latest draft City Plan 2040, and to request members consider two amendments to the draft heritage policy before it is approved for Regulation 19 examination. These amendments relate to the coherence of policies with regard to Bevis Marks Synagogue and tall buildings in conservation areas and their consistency with national heritage policy. Our comments are accompanied by straightforward amendments to address each concern, intended to avoid any unnecessary delay to the ongoing local plan examination process scheduled for February and March 2024.

**The setting of Bevis Marks Synagogue**

Bevis Marks is amongst the most important synagogues in the country (if not Europe) and is accordingly listed at grade I on account of its exceptional historic and architectural significance. All parties are agreed that the synagogue draws a critical part of its significance from natural daylight, and that this daylight is drawn from a wider setting which is open to the sky and (currently) largely free from tall buildings. The adoption of the Creechurch Conservation Area earlier this month recognises this point and is intended to provide a new layer of planning legislation to protect the building and its setting.

The current wording and scope of draft City Plan 2040 Policy HE1 (managing change to the historic environment) risks undermining the clarity and coherence of this setting protection. The policy states the draft City Plan 2040 would only require that the 'Immediate setting' of the synagogue be protected, without defining clearly what the extent of immediate means. This wording risks leaving the extent of the synagogue's setting open to interpretation and its wider setting unprotected.

Limiting protection to just the immediate setting of a grade I listed building also conflicts with the provisions of the Planning (LBs & CAs) Act 1990 which states that Local Planning Authorities have a duty to protect the entire setting of listed buildings and the character and appearance of conservation areas as a whole.

*We would therefore suggest the following:*

1. The policy wording is amended to state that: "Development in the defined immediate setting of Bevis Marks Synagogue and The Monument and development that affects their wider setting (including views out and in) should preserve and where possible enhance the elements that contribute to the significance of their setting."

2. The policy map provided be amended to also show the wider setting zone and view corridors to and from the synagogue which are to be protected. This would afford planners and developers alike the clarity about where any potential new development is likely to be appropriate or inappropriate. This could also form the basis of a new Bevis Marks Views Study, much like the one prepared for The Monument in December 2020. Clarity at this point is critical if the application of this emerging policy is to be robust.

### **Tall buildings in conservation areas**

We call for the re-instatement of policy CS14 of the existing City Plan 2015 which states that tall buildings within inappropriate areas, including conservation areas, will be refused. This policy has been dropped without explanation in the draft City Plan 2040 and has left Bevis Marks Synagogue once again open to the threat of large-scale development within its setting. In the absence of this policy, doubts now arise over the inclusion of 31 Bury Street within the recently designated Creechurch Conservation Area. Under the current policy CS14, the inappropriateness of a tall building on this site (now within the conservation area) and the setting of the synagogue was clear. Without Policy CS14, this protection is now no longer as clear.

Parallels are frequently drawn between the complex settings of both Bevis Marks Synagogue and The Monument. However, The Monument is afforded extensive and detailed policy protection on its setting in its widest sense. Failing to achieve parity in the emerging policy detail for Bevis Marks Synagogue risks leaving the grade I listed building and new Creechurch Conservation Area as poorer relatives to The Monument, and at far greater risk of harmful and inappropriate development in the future.

This is especially the case in the context of approved plans for a 56 storey tower at 100 Leadenhall (one block to the south), and the plans awaiting determination for a 76 storey tower at 1 Undershaft (two blocks to the west west).

The loss of this policy also has wider implications for conservation areas and listed buildings across the Square Mile. The City of London has an unusually large number (28) of often small conservation areas and over 6000 listed buildings. In the context of well documented development pressure on almost every site (occupied or unoccupied), clarity over the appropriateness of tall buildings in these specific areas and their settings is critical if the special significance of the City's historic environment is to be preserved and its heritage policies robust enough to be enforceable. This should include a balanced approach to policy presumptions regarding areas which are appropriate for tall new development with obvious setting impacts and areas which are not. A truly constructive approach to policy should not preclude the use of clear and straightforward policy limitations such as the current Policy CS14.

*We would therefore suggest the following:*

1. That Policy CS14 is reinstated with regard to conservation areas alongside policies setting out positive plans for where tall buildings would be acceptable.
2. This would allow the City's traditional policy focus on protecting conservation areas from harmful development whilst also satisfying the London Plan's requirement around positive plan making for new development in local planning policy.

### **'Retrofit first' approach to design and reuse**

We welcome the City's commitment to policies requiring all future major development to consider retrofitting rather than demolishing existing buildings. Draft Policy OF1 (Office Development) seeks to prioritise retrofitting of existing buildings, in line with the 'retrofit first' approach set out in Chapter 9 of the City Plan. Policy DE1 (Sustainable Design) sets out a 'retrofit first' approach, requiring all major development to undertake an options appraisal to identify the most sustainable and suitable approach for the site.

Given the high-profile nature of this issue in planning practice and the construction industry at large, it is encouraging to see the City of London taking a lead in this area. This couldn't more timely given changing office needs, working habits and the sheer amount and variety of vacant office stock in the Square Mile, with many such buildings being of heritage significance.

## Conclusion

I trust these comments will be of assistance to members and we welcome the City of London's ongoing work to preserve and enhance its unique heritage in the emerging City Plan.

Yours sincerely,

REDACTED

## REDACTED

Senior Conservation Officer, SAVE Britain's Heritage

Cc: REDACTED City of London Corporation  
REDACTED