Public Document Pack

Planning and Transportation Committee

SUPPLEMENTARY PACK

AGENDA ITEM 4

CITY PLAN MAIN AND ADDITIONAL MODIFICATIONS

Date: **TUESDAY, 21 OCTOBER 2025**

Time: 10.30 am

Venue: **OLD LIBRARY - GUILDHALL**

4. **CITY PLAN MAIN AND ADDITIONAL MODIFICATIONS**

Report of the Executive Director Environment.

For Decision
(Pages 3 - 418)

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Committee(s)	Dated:
Local Plans Sub Committee Planning and Transportation Committee Policy and Resources Court of Common Council	9/10/2025 21/10/2025 13/11/2025 4/12/2025
Subject: City Plan Main and Additional Modifications	**Public report:** For decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **Provides statutory duties**	This report relates to the statutory planning function
Does this proposal require extra revenue and/or capital spending?	**No**
If so, how much?	**n/a**
What is the source of Funding?	**n/a**
Has this Funding Source been agreed with the Chamberlain's Department?	**n/a**
Report of:	Katie Stewart, Executive Director of Environment
Report author:	Gudrun Andrews, Head of Planning Policy

Summary

The City Plan was submitted for Independent Examination in August 2024. The formal examination hearings have now concluded and a list of Main and Additional Modifications to the plan has been prepared in collaboration with the Planning Inspectors. These amendments require formal consultation for a period of six weeks. This report seeks member approval to commence this consultation and provide a City Corporation response to the matters raised within the consultation. This will then be sent back to the Planning Inspectors to be considered in their Final Report. Once the Inspector's Report has been received the City Corporation will be free to commence the governance process for adoption. The City Plan will then form part of the Development Plan for decision making purposes.

Recommendation

Members of the Local Plans Sub-committee are asked to:

- RECOMMEND approval of a six-week consultation period on the Main and Additional Modifications to the City Plan (Appendix 1 and 2), the Sustainability Appraisal Review (Appendix 3) and the changes to the Policies Map (Appendix 4)

Members of Planning and Transportation Committee are asked to:

- APPROVE a six-week consultation period on the Main and Additional Modifications to the City Plan (Appendix 1 and 2), the Sustainability Appraisal Review (Appendix 3) and the changes to the Policies Map (Appendix 4)
- DELEGATE authority to the Director of Planning and Development, in liaison with the Chair and Deputy Chair of the Planning and Transportation Committee to provide a City Corporation response to the consultation responses received

Members of Policy and Resources Committee are asked to:

- RECOMMEND to the Court of Common Council the Main and Additional Modifications to the City Plan 2040 within Appendix 1 and 2 as amendments to City Corporation corporate strategy

Main Report

Background

1. The City Plan was last brought to Planning and Transportation Committee on 31 January 2024. This report detailed the previous rounds of consultation and engagement, background evidence and the form and content of the Regulation 19 version of the City Plan. The report sought approval to consult on the Regulation 19 'Proposed Submission' version of the City Plan 2040 and to then submit the City Plan to the Secretary of State for independent examination. It also sought authorisation of the Planning and Development Director, in liaison with the Chair and Deputy Chair of the Planning and Transportation Committee, to compile a list of further changes to the City Plan in response to public representations and submit these to the Secretary of State. This report was also taken to Policy and Resources on 22 February and Court of Common Council on 7 March 2024.

2. The Regulation 19 consultation took place between 18 April and 17 June 2024 and was submitted, in line with the proposed timetable on 29 August 2024. Following submission the plan is termed 'at examination' which includes all the process including the formal hearings until the receipt of the Inspectors' Final Report. The formal hearings concluded on 12 June 2025.
   .

Examination progress

3. The City Corporation submitted the City Plan for examination on 29 August 2024. From this point onwards the timetable is driven by the Inspectors in line with the regulations and procedures rather than the City Corporation. The role of the appointed Planning Inspectors is to determine whether the City Plan is 'sound' and 'legally compliant'.

4. The dedicated examination page at https://www.cityoflondon.gov.uk/services/planning/planning-policy/city-plan-

2040-examination-in-public includes all the information, submissions and correspondence relating to the City Plan examination. This includes the Inspectors' Main Matters, Issues and Questions (MIQs) which were received in February 2025 and the Matter Statements prepared by the City Corporation and other parties in response. The MIQs formed the basis of the discussions at the hearing sessions.

5. The hearing sessions initially commenced with a focus on matters of legal compliance (Matter 1). As the Inspectors can only seek to address matters of soundness, any substantial issues regarding legal compliance would have arisen at this stage, potentially leading to a pause in the examination. However, no significant matters were raised, allowing the examination to proceed to matters of 'soundness'. Subsequent hearings explored the strategic priorities and spatial strategy before detailed topic-based discussions around housing, office floorspace, retail and culture. The third week focussed on heritage and tall buildings matters which attracted the greatest number of comments and participants at the hearings. The recordings of the hearing sessions are available on the examination website.

6. A series of new documents were produced by the City Corporation during the course of the hearings at the Inspectors' requests. Most notably further Heritage Impact Assessment of the proposed amendments to the tall building contours at the southern edge and the inclusion of a new Broadgate tall building area (ED-HTB36-40). All participants were invited to submit addenda to their previous matter statements to reflect this. Other additional submissions included an updated note on housing delivery and the Corporation's opening and closing statements.

7. In September officers received confirmation of the 'Main Modifications' which the Inspectors are recommending to the City Corporation to make the plan 'sound'. These modifications need to be put out to formal consultation on behalf of the Inspectors. For completeness the 'Additional' modifications which are more minor amendments, which do not relate to soundness will also be consulted upon. Only when this has been concluded and the Inspectors' Final Report received can the City Corporation proceed to adopt its plan to replace the Local Plan 2015 as the local plan for the City, at which point it gains full weight in decision-making on planning applications.

Approach to modifications

8. As highlighted above, the Planning Inspectors only have powers to address matters of soundness through the examination and a failure in relation to legal compliance in plan preparation cannot be rectified. However, a local plan can be amended on the direction of the Inspectors, and there are opportunities to put forward some suggested changes to the Inspectors during the examination

process. Each potential change then needs to be agreed by the Inspectors and 'recommended' back to the Corporation by the Inspectors in their report. The agreement of main and additional modifications is a normal part of the examination process.

9. The City Corporation has proposed changes under examination document (LD26), through Statements of Common Ground (SOCG1A, SOCG9-24), but also through the examination hearings. At the formal hearings it was made clear that any proposed changes would be subject to later member confirmation through the main modifications and adoption processes. Throughout the examination hearings members were kept informed of topics discussed through regular briefings and actions, and the sessions were recorded for future review.

10. The Inspectors have now agreed the lists of Main and Additional Modifications. These total 178 changes to the City Plan, of which 68 are considered to relate to soundness. The Main Modifications are proposed by the Inspectors without prejudice, and will remain unconfirmed until the receipt of the Inspectors' Final Report. This report seeks authorisation for the consultation to take place.

11. As the examination hearings were officially closed by the Inspectors on 12 June and the Main Modifications agreed by the Inspectors, there is no further scope to reopen the debates through further amendments to the MMs, or to propose alternative changes. The only alternative to taking forward the modifications to consultation stage would be to withdraw the plan from examination and restart the plan-making process. Given the transition period to a new plan-making system as set out in Annex 1 of the NPPF it would not be possible to commence plan-making again until late 2026. Adoption under the new approach would take approximately 30 months so adoption would not be until mid-2029.

Main Modifications

12. The Main Modifications to the City Plan are included at Appendix 1 to this report. It makes clear, with reference to the tests of soundness (justified, effective or positively prepared) why each modification is required. The Inspectors have approved these modifications (without prejudice) and are recommending these changes back to the City Corporation. The Inspectors consider the Main Modifications to be required to make the plan 'sound', ie without these changes the City Plan would be considered 'unsound' and the City Corporation could not proceed to adoption. Therefore, at this stage this list is finite and cannot be amended by the Corporation.

13. Many of the changes relate to changes to the heritage and tall buildings chapter (MM41-56), including:

    - clarifications on the need to preserve (and where possible) enhance the Conservation Areas (MM41, 42)
    - use of the St Paul's Setting Study in assessments (MM44)
    - how the Outstanding Universal Value of the Tower of London should be utilised and interpreted

- changes to the contours at the southeastern corner of the City Cluster and to include a new tall building site at Broadgate (MM2, MM51-53, 56)- see updated Figure 15 in Appendix C.

14. A majority of the changes in Appendix 1 are as proposed post submission, or through discussions at the examination. One exception is a change proposed within Statements of Common Ground with Historic England (examination document SOCG9A) and the Bevis Marks Synagogue (SOCG24A). The Inspectors have considered this change and have informed the City Corporation that this is not required for soundness reasons as the identified heritage assets already have legislative and policy protection. They consider that the apparent elevation of the Bevis Marks Synagogue could have unintended consequences in relation to proposals relating to other designated heritage assets, with ambiguity for the decision maker. Therefore, the whole of the proposed additional text at paragraph 11.2.1a of the City Plan is no longer being taken forward as a modification. This text had been drafted as follows:

    "It should be noted that the contribution that any part of the totality of a setting makes to the significance of a designated heritage asset is afforded protection by relevant legislation, national policy and Policy HE1. This would include consideration of impacts on sky space in views, where this enables aspects of their significance to be appreciated. The identification of the immediate settings of the Monument and Bevis Marks synagogue in policy is therefore intended to further strengthen their protection."

15. Other notable Main Modifications are:

    - the articulation of a 'Vision' for the City Plan (MM1)
    - additional information relating to the expected housing completions, including within a new Appendix to the Plan (MM10-14)
    - inclusion of the minimum office requirement in GIA (in addition to NIA) (MM17, 18)
    - further explanation of the cultural contributions from developments of different scales (MM21)
    - infrastructure provider engagement through the development process (MM23)
    - exceptional circumstances where lower long-stay on-site cycle provision may be acceptable (MM38-40)

Additional Modifications

16. Other more minor 'Additional Modifications' have also been proposed during the examination (see Appendix 2). These do not go to the heart of soundness and include minor amendments to text or figures, correction of typographical errors or factual update only. The Inspectors have agreed that these amendments do not relate to soundness but will be consulted upon for completeness.

Consultation and procedure

17. As set out above, following submission Main Modifications can only be made on the recommendation of the Inspectors to address soundness matters.

18. Members are asked to recommend to Court of Common Council the approval of consultation on the Main Modifications to the City Plan as at Appendix 1, the Sustainability Appraisal Review (Appendix 3) and the Habitats Regulation Assessment Matrix (Appendix 5) as part of the formal examination process into soundness and legal compliance. For completeness members are also asked to approve consultation on the Additional Amendments as at Appendix 2 and the Policies Map 'Atlas of Change' (see Appendix 4) however these do not fall within the scope of the examination process. A tracked changes version of the City Plan is included in Appendix 6. The documents will then be put out to public consultation for a period of six weeks. This presents an opportunity for all interested parties, including (but not limited to) those who took part in the examination hearings to put forward their views on the implications of the changes and whether they consider the modifications to be sound and/or legally compliant.

19. The responses will then be collated and sent back to the Inspectors with a brief City Corporation response. The Inspectors will then consider the consultation responses in drawing together conclusions within their report. If the plan is then found 'sound' and legally compliant the City Corporation is then free to commence with the governance process of adoption. At that stage members will asked to make the decision to adopt the plan including the final modifications that will be included within the Inspector's Report.

Additional appraisals

20. A Sustainability Appraisal of the Regulation 19 City Plan was undertaken as part of the preparation process. The Main Modifications have also been subject to additional Sustainability Appraisal screening and assessment to determine whether they have any significant or cumulative effects. This assessment is also included in Appendix 3 and will be subject to the six-week consultation. It concludes that the changes to the City Plan are likely to have uncertain or positive impacts. The mitigation measures included within the City Plan policies remain.

21. The City Plan is also accompanied by Habitats Regulations Assessment (HRA), which assessed the impact of policies in the City Plan on the identified European sites at Epping Forest, Lee Valley, Richmond Park and Wimbledon Common. This concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites. The main modifications propose only limited changes to the scope of the policies which are identified as having an impact upon the sites, and the mitigation measures contained within the policies as identified remain unchanged. This HRA Review Matrix is included in Appendix 5 and will be subject to the six-week consultation.

22. An Equalities Impact Assessment was also undertaken to support the City Plan. This found the impacts to be broadly positive. This is discussed in more detail below, however, it is not considered that the Main Modifications amend these positive conclusions.

Next steps

23. Following approval, the Main and Additional Modifications will be consulted upon for 6 weeks, to be concluded by the end of January 2026. The responses will be collated and sent back to the Inspectors in February 2026. The next stages will be the receipt of the Inspectors' Fact Check Report anticipated in April 2026, followed by the Final Report in May 2026.

24. Following receipt of the report the City Plan 2040 will be brought back to Planning and Transportation Committee, Policy and Resources and Court of Common Council to seek approval for adoption. Once adopted it will form part of the Development Plan for the Square Mile and will have full weight in planning decisions.

Corporate & Strategic implications

25. The preparation of the City Plan will contribute to the implementation of the Corporate Plan (2024-2029). It will support the delivery of key Corporate priorities, along with proposals to ensure a sufficient supply of business space and complementary uses to meet future needs. Preparation of the revised City Plan is being undertaken alongside the adopted Transport Strategy and the revised end date of the City Plan (2040) will align with the key net zero target in the Climate Action Strategy.

Financial implications

26. The City Plan is a statutory function that the Corporation are required to deliver. While the many of the costs of drafting and consulting on the City Plan are met through existing budgets, additional reserve funds were made available to cover the costs of the examination hearings. As we now progress to the latter stages of plan-preparation these can again be covered through existing budgets, including the costs of the main modifications consultation. There are no immediate unfunded financial barriers to continuing the process toward plan adoption.

Resource implications

27. All work associated with the main modifications consultation is being carried out in-house by the Development Plans Team, working alongside and supported by Development and Design colleagues in the planning service and by other services as appropriate.

Legal implications

28. The City Plan has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. It has also been supported by additional assessments required or informed by other legislation, including the Habitats Regulations, Environment Assessment of Plans and Programmes, 2004, and the Equality Act 2010.

29. Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

30. The City Plan 2040 is a material consideration to be taken into account in determining planning applications within the Square Mile. The weight to be given to the plan will increase as it advances through main modifications consultation, Report and adoption stages. On adoption the City Plan will have full weight in decision-making in accordance with paragraph 48 of the NPPF.

Risk implications

31. Officers continually review and report on the risk assessment process associated with the preparation of the City Plan 2040. The risks of not adopting the City Plan according to this timetable would be that the City Corporation would need to continue to determine proposals in accordance with the Local Plan 2015 and the 2021 London Plan for the foreseeable future. The amount of weight to be given to these policies would depend on the degree of consistency with the National Planning Policy Framework and would likely diminish over time.

Equalities implications

32. The City Corporation has had due regard to the Public Sector Equality Duty (PSED) in its plan-preparation processes. Several policy amendments were included within the Regulation 19 version of the City Plan to take account of the impacts on protected groups and were assessed as positive within the Equality Impact Assessment (EQIA). This assessment demonstrated that the effects of the plan as a whole will be broadly positive. There are no major negative impacts as a result of the City Plan.

33. The City Corporation has undertaken a review of the Main Modifications to the policies against the conclusions of the appraisal as set out in Part 4 of the Assessment. As set out in the Sustainability Appraisal review at Appendix 3, the only significant changes to policies relate to AT3 and cycle parking and the amendments to the tall buildings contours. These changes do not result in any change to conclusions within the EQIA.

34. The PSED is a continuing and ongoing duty. The broadly positive outcomes of the policies contained within the City Plan also apply to decision-making points in the processes to adoption.

Climate implications

35. The City Plan is one of the key mechanisms for achieving the targets in the Climate Action Strategy that relate to the Square Mile, in particular the net zero target for the Square Mile by 2040, and tackling climate resilience. Many policies in the Plan seek to address climate issues, particularly policies on sustainable development and the retention of existing buildings, including for offices.

Security implications

36. Policies in the City Plan seek to ensure the Square Mile remains resilient to security requirements, especially as new developments come forward in the City.

Conclusion

37. The report seeks authorisation for formal consultation on the Main Modifications to the City Plan 2040, as agreed with the Planning Inspectorate. It also seeks consultation on the Sustainability Appraisal Review of the Main Modifications, the Additional Modifications, and the changes to the Policies Map. The City Plan will be brought back to all committees in Summer 2026 to seek approval for adoption.

Appendices

- Appendix 1- Main Modifications
- Appendix 2- Additional Modifications
- Appendix 3- Sustainability Appraisal Review
- Appendix 4- Policies Map ‘Atlas of Change’
- Appendix 5- HRA Review matrix
- Appendix 6- Tracked Changes version of the City Plan

Report author

Gudrun Andrews
Head of Planning Policy

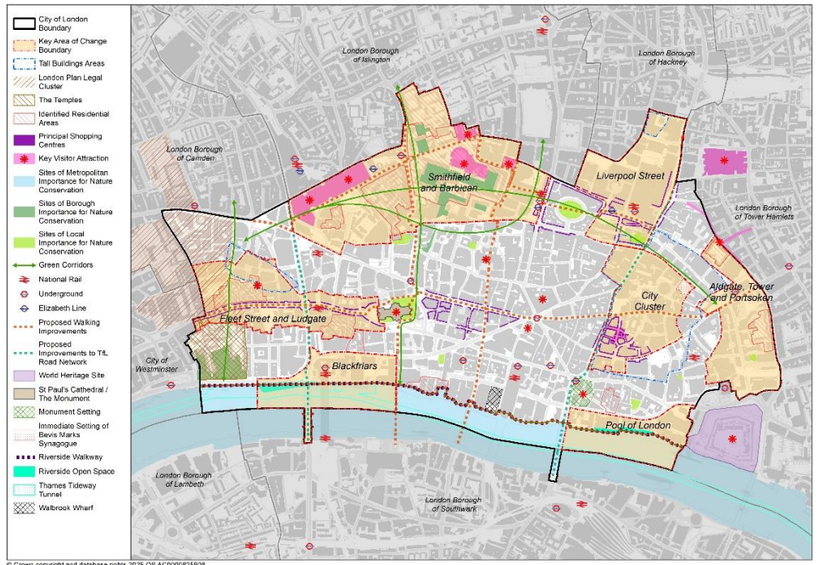
E: gudrun.andrews@cityoflondon.gov.uk

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Appendix 1 Main Modifications

Table 1: Main modifications

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	By 2040 the City of London will have become: 1. **A stronger, more vibrant and competitive economy.** The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. **A 7-day-a-week destination.** The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. **A more sustainable city-** The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. **A more inclusive and healthier city-** the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. **A place where heritage and positive change are celebrated**-the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	*Change to include new Broadgate Tall Building Site on Key Diagram* 
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, ~~and~~ the Fleet Valley and the Broadgate tall building site, which are identified as areas suitable for tall buildings.
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	Effective	HL2 (1) Developers will be required to effectively manage ~~the~~ their proposal's impact ~~of their proposals~~ on air quality. Major developments must comply with the requirements of the Air Quality SPD ~~for~~ which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	Effective	HL7 (2) Existing ~~public~~ sport and recreational facilities will be protected in situ, unless:
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	Effective	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. However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	Effective	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phrase, 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. For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	Positively prepared	2. Ensuring sufficient affordable housing is provided. Incentivising affordable housing delivery to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land; b. 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 c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and where appropriate 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.
Chapter 4 Housing	4.1.12	MM9	Effective	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.~~ It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th></tr>
<tr><td>Chapter 4 Housing</td><td>New paragraph</td><td>MM10</td><td>Effective</td><td>
New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)

4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.

Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.

Table 1- Housing Delivery (Source City Corporation Monitoring data)
<table>
<tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr>
<tr><td>2019/20</td><td>296</td><td>Completions</td></tr>
<tr><td>2020/21</td><td>202</td><td>Completions</td></tr>
<tr><td>2021/22</td><td>433</td><td>Completions</td></tr>
<tr><td>2022/23</td><td>96</td><td>Completions</td></tr>
<tr><td>2023/24</td><td>0</td><td>Completions</td></tr>
<tr><td>2024/25</td><td>29</td><td>Completions</td></tr>
<tr><td>2025/26</td><td>41</td><td>Completions (projected)</td></tr>
<tr><td>2026/27</td><td>97</td><td>Completions (projected)</td></tr>
<tr><td>2027/28</td><td>580</td><td>Completions (projected)</td></tr>
<tr><td>2028/29</td><td>342</td><td>Completions (projected)</td></tr>
<tr><td></td><td>2,116</td><td></td></tr>
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<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th></tr>
<tr><td>Appendix 2</td><td>New appendix</td><td>MM11</td><td>Effective</td><td>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.

*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40

<table>
<tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr>
<tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr>
<tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr>
<tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr>
<tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr>
<tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr>
<tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>Total</td><td>1,706</td><td>2,430</td><td></td></tr>
</table></td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.8</td><td>MM12</td><td>Positively prepared</td><td>4.1.8 …. 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. Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.10</td><td>MM13</td><td>Effective</td><td>4.1.10 … 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 for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40…</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.11</td><td>MM14</td><td>Effective</td><td>4.1.11 ~~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.~~</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.15</td><td>MM15</td><td>Effective</td><td>4.1.15. …The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.</td></tr>
</table>

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th></tr>
<tr><td>Chapter 4 Housing</td><td>HS6 (2)</td><td>MM16</td><td>Effective</td><td>HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.</td></tr>
<tr><td>Chapter 5 Offices</td><td>S4 (1)</td><td>MM17</td><td>Effective</td><td>Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 NIA (1,600,000 m2 GIA) net during the period 2021 to 2040, phased as follows:
2021 – 2026 500,000m2 NIA (666,666m2 GIA)
2026 – 2031 400,000m2 NIA (533,333m2 GIA)
2031 – 2036 200,000m2 NIA (266,666m2 GIA)
2036 – 2040 100,000m2 NIA (133,333m2 GIA)</td></tr>
<tr><td>Chapter 5 Offices</td><td>5.1.1</td><td>MM18</td><td>Effective</td><td>The minimum requirement of ~~overall office floorspace target of~~ 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040…</td></tr>
<tr><td>Chapter 5 Offices</td><td>5.3.9</td><td>MM19</td><td>Effective</td><td>5.3.9…Where a change ~~in~~ of use is proposed from office floorspace to another use,…

….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. Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. ….</td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>7.1.5</td><td>MM20</td><td>Effective</td><td>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. When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>New paragraph after 7.3.3</td><td>MM21</td><td>Effective</td><td>New paragraph 7.3.4

Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.

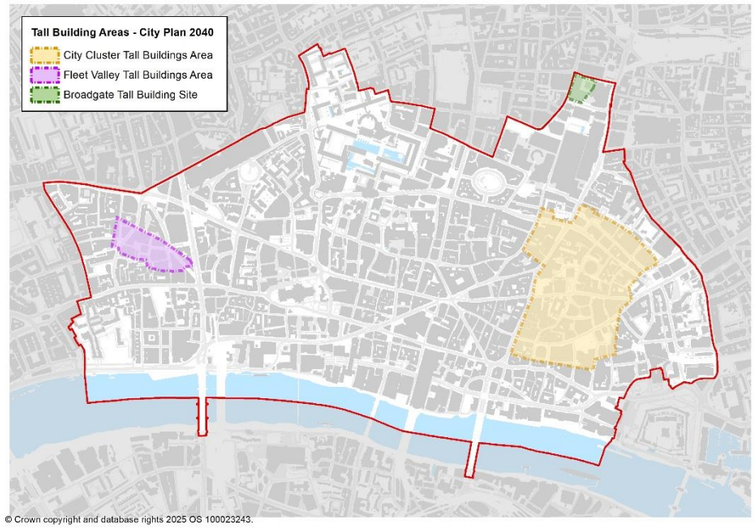
<table><tr><td></td><td>On Site</td><td>Off Site</td></tr><tr><td>> 10,000sqm gross floorspace</td><td>Yes. Provision will be commensurate with the scale of development</td><td>Not acceptable</td></tr><tr><td>< 10,000sqm gross floorspace</td><td>Preferred. Provision will be commensurate with the scale of development</td><td>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</td></tr></table></td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>CV4 (2)</td><td>MM22</td><td>Effective</td><td>CV4 (2) Do not result in unacceptable adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts</td></tr>
</table>

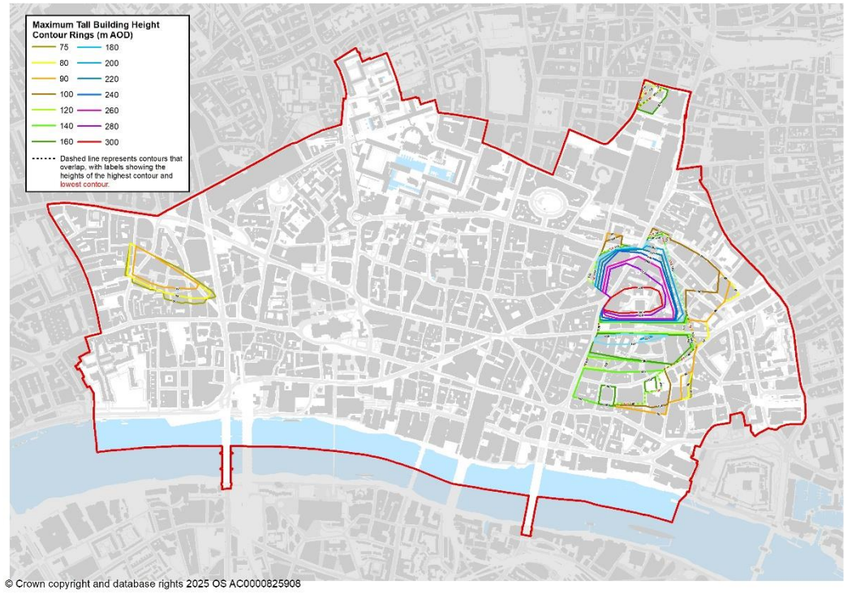
Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 8 Infrastructure	IN2	MM23	Effective	1. Development must not lead to capacity or reliability issues in the surrounding area and should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers ~~capacity projections must take into account the impacts of climate change which will influence future infrastructure demand~~. 2. Developers are required to ~~demonstrate, through effective engagement with~~ provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development. 3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, ~~which may require the provision of~~ and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades. *Policy clauses 2 and 3 renumbered.*
Chapter 9 Design	9.1.0	MM24	Effective	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, retrofitted and refurbished buildings.
Chapter 9 Design	9.1.3	MM25	Effective	9.1.3 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 life-cycle carbon of different development approaches.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental sustainability benefits for the site, its context and the whole City before considering ~~the many wider~~ other 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.
Chapter 9 Design	9.1.5	MM27	Effective	9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.
Chapter 9 Design	DE1 (1)	MM28	Effective	DE1 (1) Development proposals should ~~follow~~ adopt a retrofit first approach~~, thoroughly exploring the potential for retaining and retrofitting.~~ At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.
Chapter 9 Design	DE1 (3)	MM29	Effective	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment at planning stage and post construction.
Chapter 9 Design	DE1 (7)	MM30	Effective	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. Retention, refurbishment, retrofit and reuse ~~Reuse, refurbishment and retention~~ of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 9 Design	DE1 (8)	MM31	Effective	DE1 (8) Proposals for major development will be required to: a. 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.~~ The adaption to climate change credit Wst 05 must be achieved in the waste category; ~~b. Commit to achieving a minimum NABERS UK rating of 5 stars;~~ Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); c. Demonstrate that London Plan guidance on operational carbon emissions and air quality requirements have been met on site.
Chapter 9 Design	9.2.0	MM32	Effective	9.2.0 Materials – ~~retaining~~ reducing embodied carbon emissions from new build construction through retrofit and ~~in existing buildings and materials, and improving~~ resource efficiency.
Chapter 9 Design	9.2.9	MM33	Effective	9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) 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. - A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period. - 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~~ be at least Air Quality Neutral, in line with the City of London Air Quality SPD. - Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole. ~~which has been incorporated to address environmental challenges.~~ - 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. - Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options…
Chapter 9 Design	9.2.9	MM34	Effective	9.2.9 **~~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. • For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.
Chapter 9 Design	DE4 (3)	MM35	Effective	3. Requiring all tall buildings ~~or major developments~~ to provide free to enter….
Chapter 10 Transport	VT3 (4)	MM36	Effective	4. All off-street non-residential bays for car parking facilities must be equipped with active electric vehicle charging points usable from the outset.
Chapter 10 Transport	AT1 (c)	MM37	Effective	AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 10 Transport	AT3 (2)	MM38	Effective	AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
Chapter 10 Transport	10.10.1	MM39	Effective	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.
Chapter 10 Transport	10.10.2	MM40	Effective	10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises. *Existing wording in 10.10.2 to move to 10.10.3, etc.*
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	Effective	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~~ sought where appropriate;
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area. 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.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	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 historic environment, townscape and skyscape, including their cumulative effects.
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	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 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 s thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance. Applicants should draw reference to the Character Areas Study and the Setting Study (where appropriate) to understand their site's significance and the key attributes of significance they should consider
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	Effective	11.3.8 On sites where significant archaeological artefacts or features 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.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	Effective	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application that shows how the OUV of the Tower of London has been interpreted.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	Effective	11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 (City Cluster, Fleet Valley and Broadgate site) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	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 respects both heritage significance and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and their ~~immediate and wider~~ settings.
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	For the purposes of Policy D9 of the London Plan, the ~~The~~ tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building Site 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 new 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, new tall buildings, particularly on sites where there is no tall building currently, would be likely to have 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.
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	11.5.6 The heights of the buildings in the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building site 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~~ These 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.~~

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	*Change to show new Broadgate Tall Building Site as an area suitable for tall buildings* 
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	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 historic environment, townscape and skyscape, including their cumulative effects.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	*New paragraph after 11.5.12 (and renumber after)* On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.

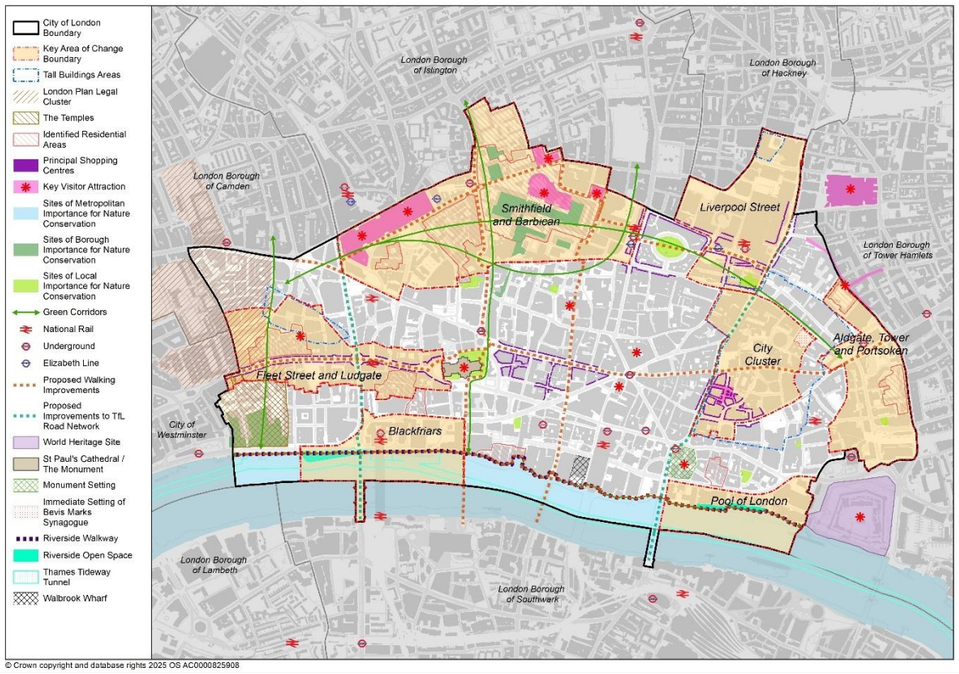
Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	*Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours* 
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	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 and the settings of historic City landmarks and skyline features;
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	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 and appropriate, including through the design of public realm and sustainable drainage systems. This can ~~Can~~ take many forms and require careful design, installation and regular maintenance.
Chapter 13 Climate Resilience	S15	MM59	Effective	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 address the impacts of the urban heat island effect; ~~2.~~ 3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding; ~~3.~~ 4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and ~~4.~~ 5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.
Chapter 13 Climate Resilience	13.1.2-3	MM60	Effective	13.1.4 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. 13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 13 Climate Resilience	CR1	MM61	Effective	2. ~~Building designs should minimise any contribution to the urban heat island effect.~~ Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.
Chapter 13 Climate Resilience	13.2.2	MM62	Effective	~~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.~~ 13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	Effective	6. Ensuring development proposals have regard to the ~~immediate~~ setting of Bevis Marks Synagogue (~~as set out in the Policy Map~~).
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	Effective	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;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	Effective	~~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;~~
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	Effective	12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	Effective	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.
Chapter 15 Implementation	Policy S26	MM68	Effective	(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations. *Renumber parts 2 and 3.*

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Appendix 2 LD33 Additional Modifications

Table 1: Additional Modifications

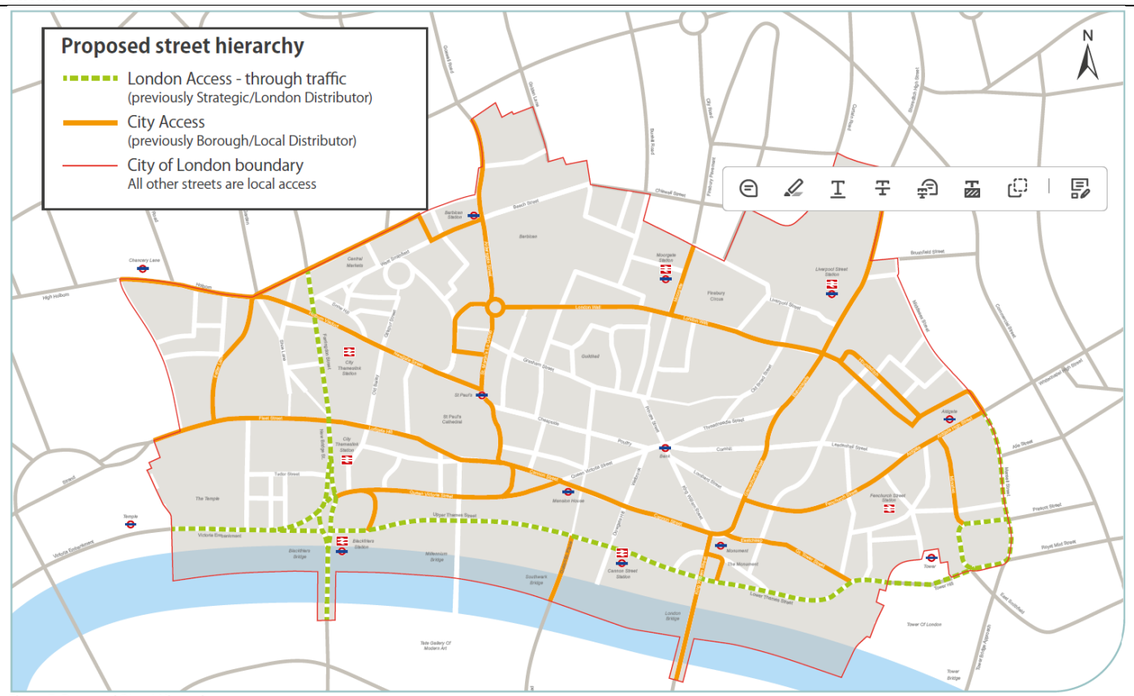
Chapter	Paragraph	AM Number	Amended text
Chapter 1 Strategic Priorities	1.1.0	AM1	1 Vision and Strategic Priorities 1.1.0 The City Plan sets out the City Corporation's strategic priorities for planning the Square Mile~~,~~. The strategic priorities form the Vision for the City over the plan period to 2040 and set a framework for the Strategic Policies and other policies under each chapter. T~~t~~ogether ~~with policies that~~ they will guide decisions on planning applications.
Chapter 1 Strategic Priorities	1.1.1	AM2	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.
Chapter 1 Strategic Priorities	1.1.2	AM3	1.1.2- As set out in paragraph 8 of the National Planning Policy Framework (NPPF)….. *Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies*
Chapter 1 Strategic Priorities	1.2 Economic Objective	AM4	Delivering sustainable economic growth, including a minimum of 1.2 million sqm NIA (1.6 million GIA) net additional office floorspace by 2040
Chapter 2 Spatial Strategy	2	AM5	*Page 12- corrections to numbering to follow sequentially, eg 2.1, 2.2*
Chapter 2 Spatial Strategy	Figure 1	AM6	*Amendment to Figure 1 Key Diagram as follows:* Green Corridors ~~Links.~~ *Add reference to LB Hackney and Islington.*  © Crown copyright and database rights 2025 OS AC0000825908
Chapter 3 Health, Inclusion and Safety	3.3.0	AM7	3.3.0…Due to its location at the heart of London and the density of development, the City of London has historically experienced high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the

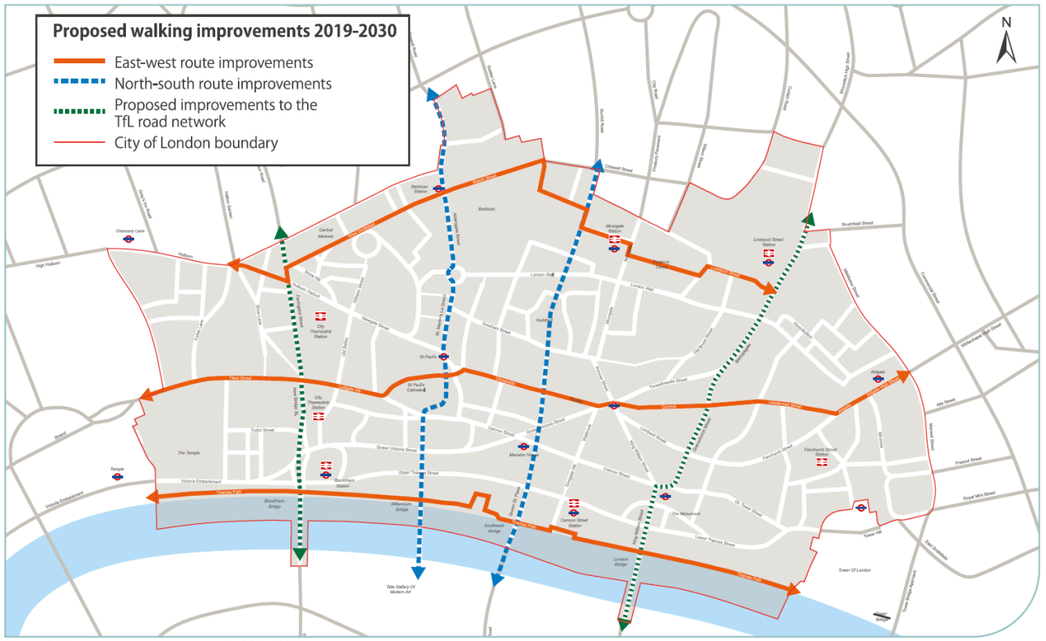
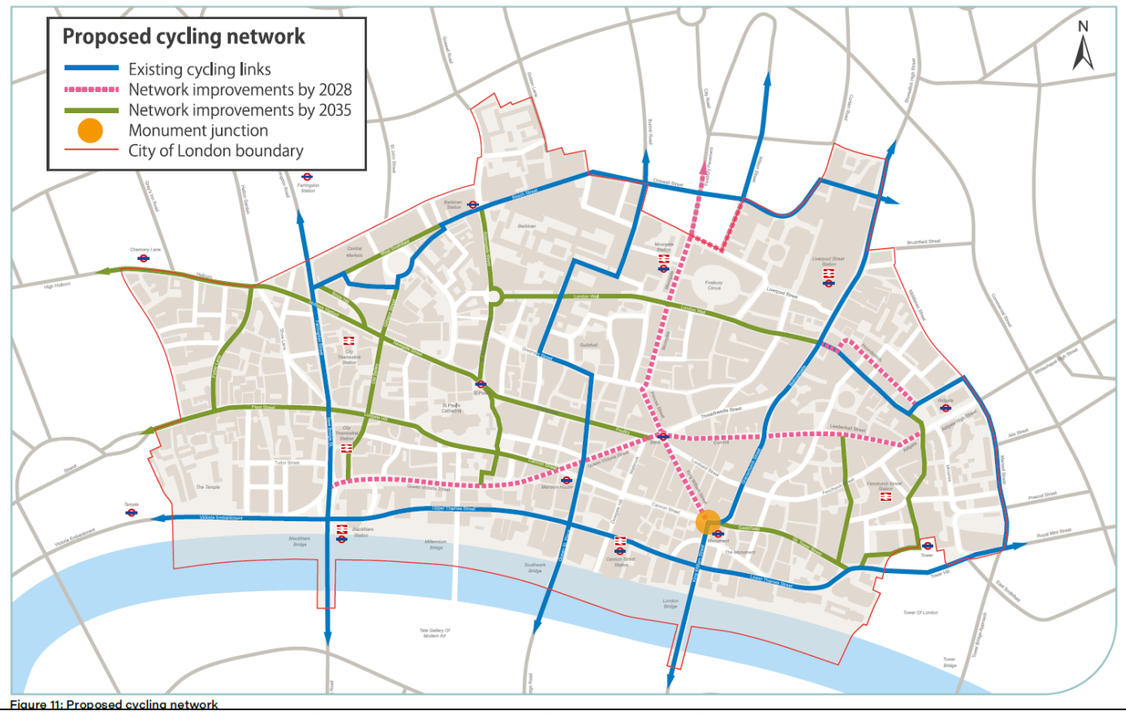
Chapter	Paragraph	AM Number	Amended text
			incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area and has been implementing actions to improve air quality through its Air Quality Strategies.
Chapter 3 Health, Inclusion and Safety	3.3.1	AM8	3.3.1…The City Corporation's ~~Draft~~ Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets an annual average of 30µg/m^3 NO_2 by 2030. ~~the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO_2 by the beginning of 2025. Limits set for particulate matter (PM_{10}) are generally met, although the national target for $PM_{2.5}$ 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_{10} and $PM_{2.5}$ by 2030".~~ The City Corporation works with a wide range of organisations to improve air quality. Although air quality has been improving, it remains at a level that still impacts on health. The City Corporation's 2025 to 2030 Air Quality Strategy sets a pathway to achieving the 2021 World Health Organisation Air Quality Guidelines for nitrogen dioxide(NO2), and particulate matter PM10 and PM2.5.
Chapter 3 Health, Inclusion and Safety	Infographic, page 23	AM9	90% of the Square Mile to meet an annual average of 30µg/m^3 for NO_2 by 2030. ~~90% of the Square Mile to meet WHO air quality guidelines for NO_2 by 2025.~~
Chapter 3 Health, Inclusion and Safety	HL3 (1)	AM10	HL3 (1) - A noise assessment will be required where noise sensitive uses may be impacted ~~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 such as housing, hospitals, schools, nurseries, places of worship, and quiet open spaces, including churchyards.
Chapter 3 Health, Inclusion and Safety	3.1.3	AM11	3.1.3… The City Corporation will work with the ~~City and Hackney~~ North East London Integrated Care Board and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.
Chapter 3 Health, Inclusion and Safety	New paragraph 3.1.5	AM12	3.1.5a The City's many churches other faith communities and their buildings, including Bevis Marks Synagogue, make a highly significant contribution to the life of the City and its built environment. The churches and places of worship play an important social, faith, community and civic role, throughout the week. The church buildings and synagogue are a significant part of the architectural and historic character of the Square Mile, are visitor destinations that provide cultural experiences, as well as providing many of the City's open spaces.
Chapter 3 Health, Inclusion and Safety	3.1.6	AM13	3.1.6 Outdoor spaces and the public realm, including churchyards, provide places for relaxation, amenity, well-being and leisure.....
Chapter 3 Health, Inclusion and Safety	3.4.2	AM14	3.4.2 Noise sensitive uses and developments in the City include residential developments, hotels and serviced apartments, health facilities, schools and childcare provision, places of worship, and certain open spaces, including churchyards.
Chapter 3 Health, Inclusion and Safety	HL6 (1)	AM15	HL6 (1) Requiring the provision of a range of directly accessible public toilet facilities suitable for ~~a range of users~~ all within the community including…
Chapter 3 Health, Inclusion and Safety	3.7.2	AM16	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 provision of new publicly accessible toilets should also meet the relevant London Plan (Policy S6) and Building Regulations (Part T) requirements. The scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.
Chapter 3 Health, Inclusion and Safety	HL9	AM17	HL9 - An HIA may also be required for developments considered to have particular health impacts~~, including those involving~~. The impact on sensitive uses such as education, health, leisure or community facilities, places of worship, publicly accessible open space including churchyards, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent should be taken into consideration.
Chapter 3 Health, Inclusion and Safety	SA2	AM18	SA2 - 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 antisocial behaviour, particularly in residential areas and near noise sensitive uses and developments such as health facilities, ~~and~~ schools, places of worship and churchyards.
Chapter 4 Housing	4.1.2	AM19	4.1.2…Other residential areas are ~~located~~ in Smithfield, the Temple~~s~~…
Chapter 4 Housing	4.2.11	AM20	4.2.11 …On public sector owned land, the higher 50% target will be applied as set out in the London Plan, except where, in accordance with London Plan policy H4, there is a portfolio agreement with the Mayor of London.
Chapter 4 Housing	4.2.15	AM21	2.2.15 …Both the ~~The~~ City's SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the Square Mile, it is considered ~~and~~ that social rented units ~~would~~ will often 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~~, considering ~~having regard to~~ evidence of need (as set out in the SHMA and its Supplement) in the City and London Plan requirements.

Chapter	Paragraph	AM Number	Amended text
Chapter 4 Housing	4.4.0	AM22	The net loss of existing housing units, including to other residential products such as student or co-living, will be resisted because of the limited opportunities to replace it in the City.
Chapter 4 Housing	HS3	AM23	The amenity of existing residents will be protected by: 1. Resisting ~~resisting~~ uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements *(new numbering proposed)*
Chapter 4 Housing	HS3	AM24	*Amend numbering so that the first sentence of the policy wording reads as its own clause rather than an introductory clause, ie:* 1. 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. *Amend numbering of clauses 1, 2 and 3 (to 2, 3 and 4) and change semicolons to full stops at the end of clauses 2 and 3.*
Chapter 4 Housing	HS4	AM25	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; and 3. Maximises opportunities for providing communal open and leisure space for residents~~;~~.
Chapter 4 Housing	HS6 (3)	AM26	HS6 (3) 35% of student ~~accommodation~~ rooms ~~on a site~~ should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
Chapter 4 Housing	4.8.3	AM27	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. In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.
Chapter 5 Offices	5.1.2	AM28	The minimum requirement ~~demand target~~ is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central figure ~~target~~ is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
Chapter 6 Retail	RE2(3)	AM29	3. New retail provision will be encouraged in active frontages and the ~~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.
Chapter 7 Culture and Visitors	S6	AM30	S6 …enhance the City of London's cultural infrastructure… S6 (2) ….a wide range of cultural infrastructure, and leisure, ~~and~~ recreation and visitor… S6 (3)…areas of cultural infrastructure ~~significance~~ including cultural buildings and leisure, ~~and~~ recreation and visitor facilities… S6 (5)…seeking opportunities to embed heritage in the cultural infrastructure ~~offer~~… S6 (7)… supports the City's cultural infrastructure or businesses ~~primary business or cultural role of the City~~… S6 (8)… especially in areas of night-time activity and around cultural infrastructure, including ~~and~~ tourist… S6 (9)…Maintaining the City's cultural infrastructure, including existing artworks…
Chapter 7 Culture and Visitors	7.1.0	AM31	7.1.0…..in the streets and informal spaces in between and to recognise this the plan takes forward a 'cultural ecosystem' approach deployed in the Cultural Planning Framework. ~~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.~~ Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed. This includes production in creative education, workspaces, studios, livery halls and places of worship; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, performance venues and places of worship. Churches and other places of worship, often open for free every day of the year, are deeply embedded in the fabric of the city and are key locations for the production and consumption of culture and provide a key role in educating and understanding the history of the City and its role in the nation. ~~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.~~ Cultural contributors are complementary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas and tourism facilities…

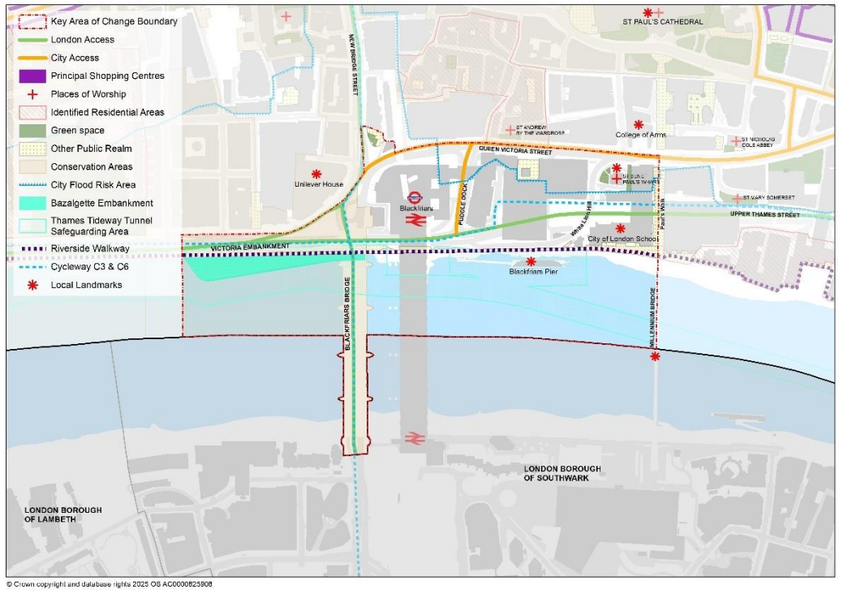
Chapter	Paragraph	AM Number	Amended text
Chapter 7 Culture and Visitors	7.1.4	AM32	7.1.4…and changes of use to protect existing cultural infrastructure, and leisure, recreation and visitor~~, arts and cultural~~ facilities…
Chapter 7 Culture and Visitors	CV1	AM33	CV1 *(Title)* Protection of Existing Cultural Infrastructure, and Leisure, Recreation and Visitor ~~Arts and Cultural~~ Facilities. CV1 (1)…. loss of existing cultural infrastructure, and leisure, recreation and visitor~~, arts, and cultural~~ facilities…. CV1 (2)…. Proposals resulting in the loss of cultural infrastructure, and leisure, recreation and visitor ~~arts and cultural~~ facilities…. …Loss of facilities will only be permitted where this would facilitate the overall enhancement of cultural, leisure, recreation or visitor, ~~arts or cultural~~ provision…….an alternative cultural, leisure, recreation or visitor, ~~arts or cultural~~ use at reasonable terms for such a use….
Chapter 7 Culture and Visitors	7.2.0	AM34	7.2.0….accommodate these uses. In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption…..
Chapter 7 Culture and Visitors	7.2.2	AM35	7.2.2….applicants will be required to demonstrate that ~~an~~ existing cultural infrastructure, and leisure, recreation and visitor~~, arts or cultural facility has~~ facilities have been marketed….
Chapter 7 Culture and Visitors	CV2	AM36	CV2 (Title) Policy CV2: Provision of Cultural Infrastructure, ~~Arts, Culture and~~ Leisure, Recreation and Visitor Facilities CV2 …provide new cultural infrastructure, leisure, recreation and visitor ~~arts, cultural and leisure~~ facilities… CV2 (2)…on-site for cultural infrastructure, ~~arts, culture or~~ leisure, recreation or visitor facilities; CV2 (3)…make provision for cultural infrastructure, ~~arts, culture or~~ leisure, recreation or visitor facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards cultural infrastructure, ~~arts, culture and~~ leisure, recreation or visitor facilities ~~and infrastructure~~. CV2 (4)…provision of cultural infrastructure, ~~arts, culture and~~ leisure, recreation or visitor facilities…
Chapter 7 Culture and Visitors	7.3.0	AM37	7.3.0…The provision of cultural infrastructure, ~~arts, culture and~~ leisure, recreation and visitor facilities….
Chapter 7 Culture and Visitors	7.3.2	AM38	7.3.2…including the type and scale of the cultural infrastructure, ~~arts, culture or~~ leisure, recreation or visitor offer…
Chapter 7 Culture and Visitors	7.3.3	AM39	7.3.3 Cultural infrastructure, ~~Arts, culture and~~ leisure, recreation and visitor facilities…
Chapter 7 Culture and Visitors	7.3.4	AM40	7.3.4…management requirements of cultural infrastructure and leisure, recreation or visitor facilities provided in new developments prior to approval. ~~A robust management~~ An outline plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage, to be completed in detail at application stage.
Chapter 7 Culture and Visitors	CV3	AM41	CV3 The provision of facilities that meet the needs of visitors ~~in~~ within new cultural infrastructure ~~developments~~ and in nearby open spaces…
Chapter 7 Culture and Visitors	CV 3 (2)	AM42	1. Structures and landscaping to enable children's play ~~and provide facilities for school groups~~ 2. Facilities for school groups
Chapter 7 Culture and Visitors	New paragraph 7.4.1	AM43	*New paragraph 7.3.4* Churches and other places of worship are a key component of the overall visitor experience and help create the distinctive look and feel of the City. They provide many of the facilities that visitors require such as: calm green spaces to stop and rest; shelter that is free to access; cafes and toilets; and activities for school groups. They also attract visitors with a diverse cultural, historical and religious offer.
Chapter 7 Culture and Visitors	CV6 (1)	AM44	CV6 (1)…public and private land and buildings; b. protecting existing works of art, statues, memorials and other objects of communal and cultural significance;… e. encouraging the use of new emerging artists, and those from under-represented groups and public art programmes
Chapter 8 Infrastructure	IN2	AM45	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. Where capacity problems are identified, developers should work collaboratively with utility providers to find a solution. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.
Chapter 9 Design	S8 (4)	AM46	S8 (4) Delivers world class sustainable buildings that are adaptable ~~and informed by~~, designed with best practice circular economy principles and ~~that~~ treat materials as a valuable resource.

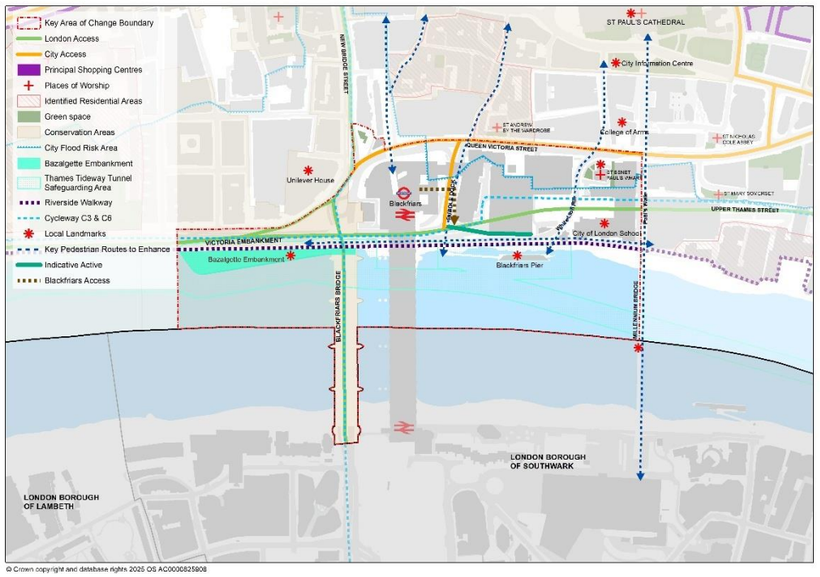
Chapter	Paragraph	AM Number	Amended text
Chapter 9 Design	S8 (5)	AM47	S8 (5) Embeds climate resilience into the early design concept to ~~and~~ contribute~~s~~ to the resilience of the Square Mile; and..
Chapter 9 Design	S8 (6)	AM48	S8 (6) Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial embodied carbon emissions.
Chapter 9 Design	S8 (8)	AM49	S8 (8) Delivers buildings and spaces that have ~~the right~~ an appropriate 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.
Chapter 9 Design	S8 (9)	AM50	S8 (9) Optimises pedestrian movement by maximising permeability at street level, 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, squares, courts and alleys;
Chapter 9 Design	9.1.1	AM51	9.1.1 Retrofitting existing buildings will in many cases result in lower ~~whole lifecycle~~ upfront embodied carbon emissions (~~in total, and~~ per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials.
Chapter 9 Design	DE1 (2)	AM52	DE1 (2) All major development must undertake an assessment of the feasible options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, ~~and should use this process to establish~~ to inform the most sustainable and suitable approach for the site.
Chapter 9 Design	9.2.3	AM53	9.2.3 Proposals for substantial demolition and reconstruction should have regard to the ~~whole-life carbon~~ whole life-cycle carbon impact, resource and energy use, when compared to the existing building.
Chapter 9 Design	9.2.9	AM54	An energy assessment in line with the Mayor of London's Energy ~~Planning~~ Assessment Guidance.
Chapter 9 Design	DE3 (7)	AM55	DE3 (7) ~~The need~~ Opportunities to integrate high quality public art as part of the public realm design;
Chapter 9 Design	9.6.5/9.6.6	AM56	*New paragraph number* 9.6.6 Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all.
Chapter 9 Design	DE7 (1)	AM57	DE7(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 including churchyards, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.
Chapter 9 Design	DE8 (1)	A58	DE8(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, places of worship, relevant open spaces including churchyards 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.
Chapter 10 Transport	S9 (4)(h)	AM59	S9 (4)(h) Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, ~~Cycling Promotion Plans~~ and Delivery and Servicing Plans
Chapter 10 Transport	Figure 7	AM60	Figure 7: Temple~~s~~

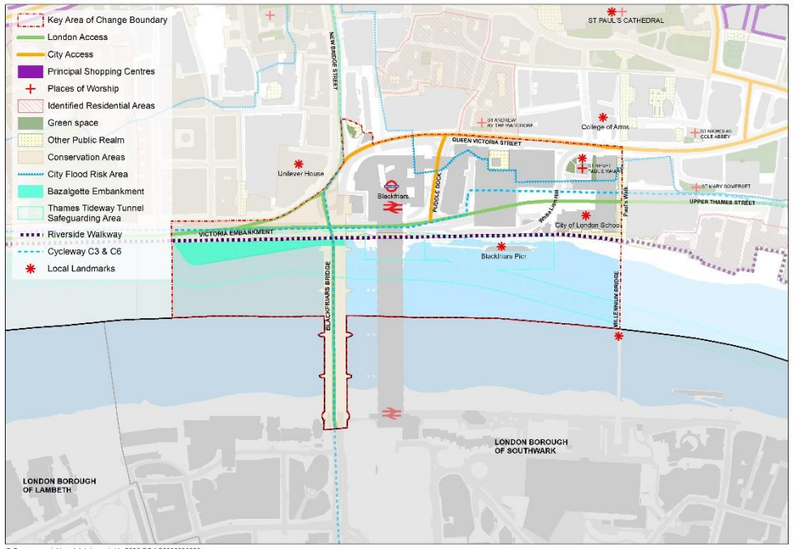
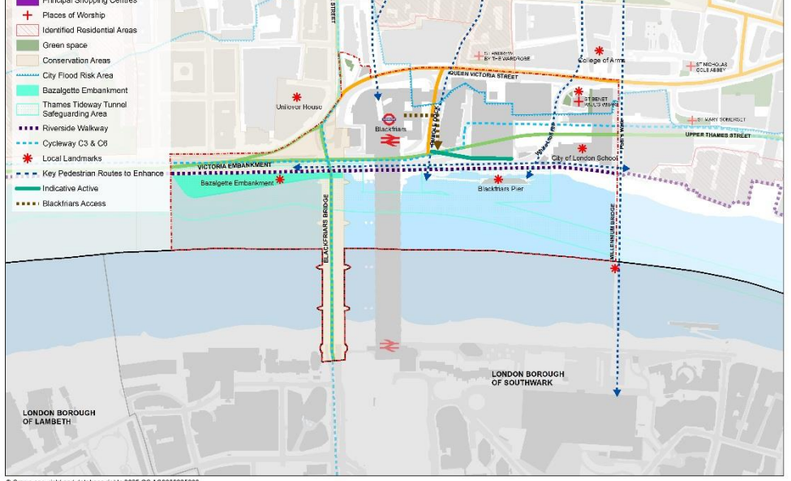
Chapter	Paragraph	AM Number	Amended text
			 Figure 7: Proposed Street Hierarchy
Chapter 10 Transport	10.1.6	AM61	10.1.6 The City Corporation will work with TfL and Network Rail to prioritise investment in accessibility improvements to underground, DLR and mainline rail stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
Chapter 10 Transport	10.2.7	AM62	10.2.7…. Applicants should work with relevant stakeholders such as TfL and Network rail and 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.
Chapter 10 Transport	10.3.0 to 10.3.5	AM63	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. Noise from freight vehicles moving on City streets and movements within servicing bays can impact the amenity of residents and workers. 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.
Chapter 10 Transport	10.7.4	AM64	10.7.4 Healthy Streets Plans will be developed by the City Corporation, working jointly with neighbouring boroughs where appropriate, 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.'
Chapter 10 Transport	Figure 10	AM65	Figure 10: Temple~~s~~

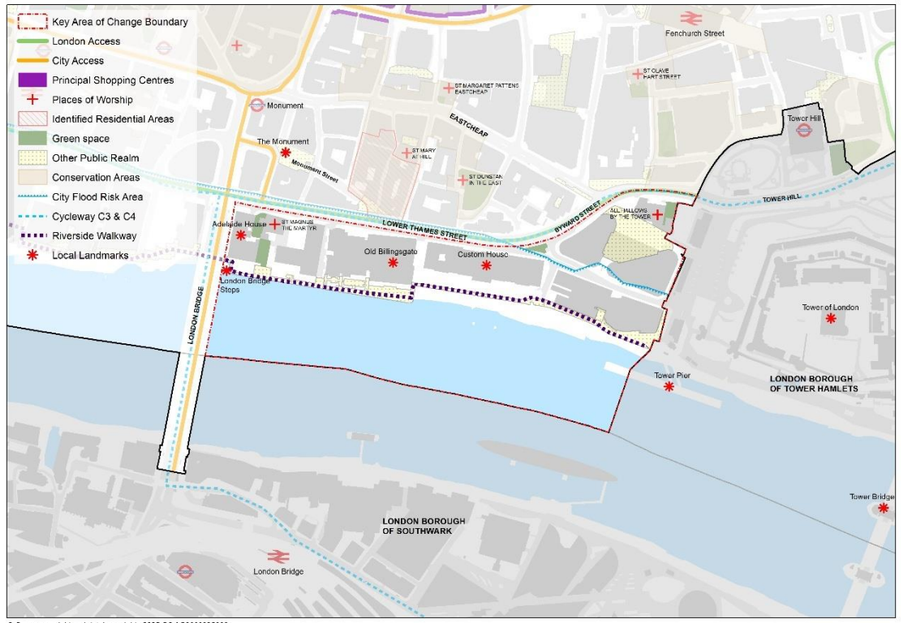
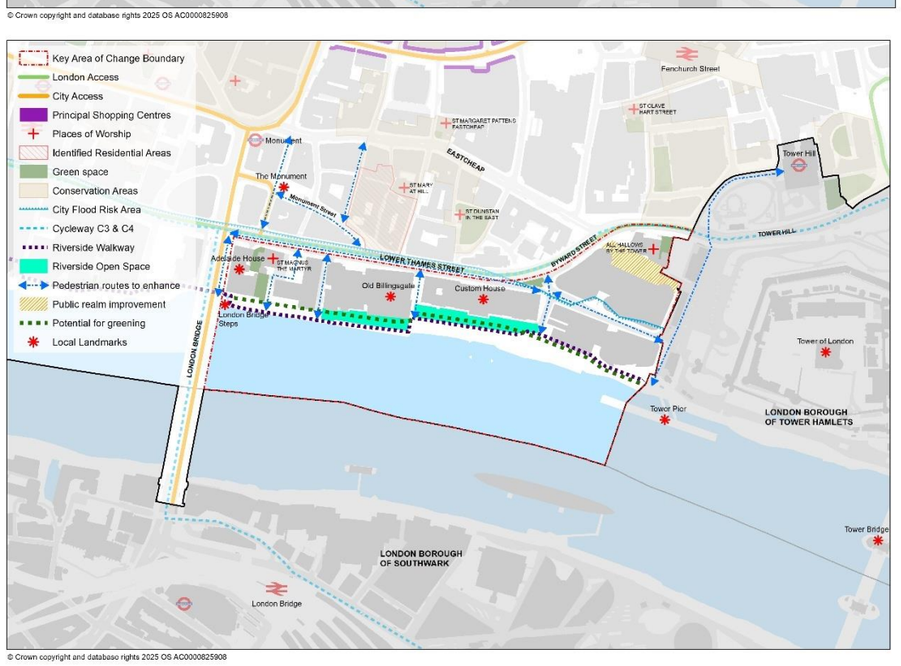
Chapter	Paragraph	AM Number	Amended text
			 Figure 10: Proposed walking improvements (2019-2030)
Chapter 10 Transport	Figure 11	AM66	Figure 11: Temple~~s~~  Figure 11: Proposed cycling network
Chapter 10 Transport	10.9.1	AM67	10.9.1 "TfL Cycleways and the TfL cycle hire scheme…will be prioritised."

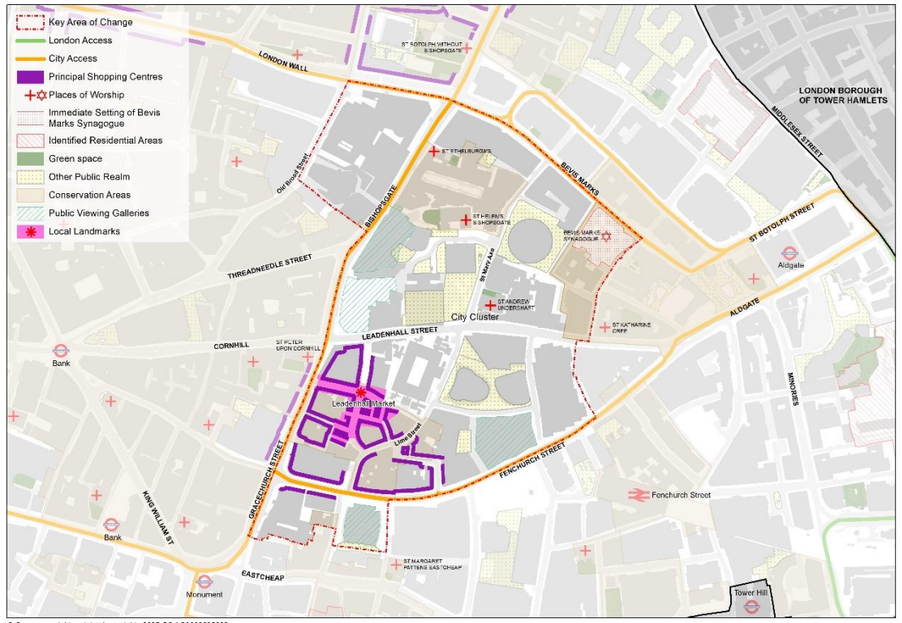
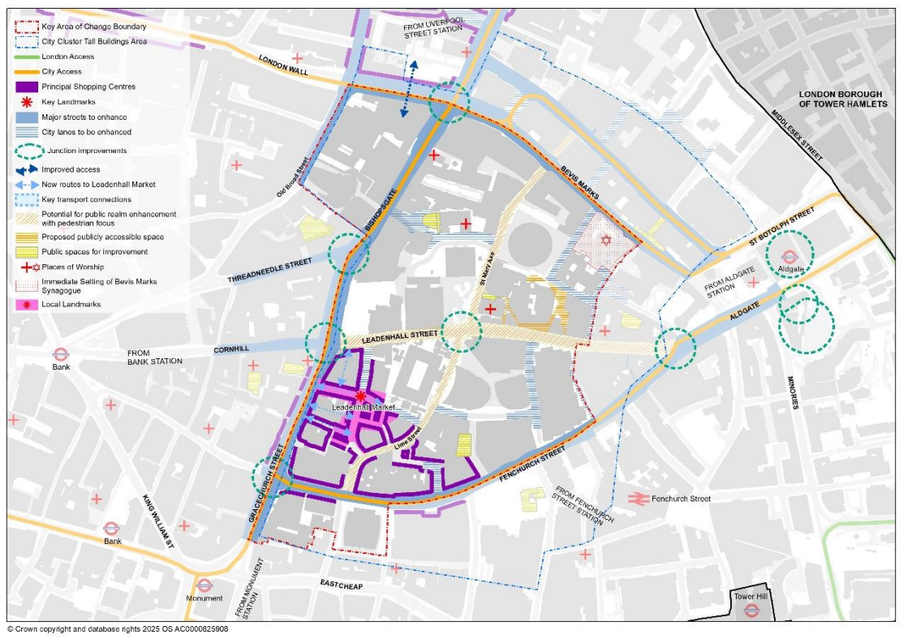
Chapter	Paragraph	AM Number	Amended text
Chapter 10 Transport	AT2	AM68	… incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards or similar future standard.
Chapter 10 Transport	AT3 (5)	AM69	AT3 (5) Opportunities to provide space for dockless parking and TfL cycle hire docks should be explored where development would create or have an impact on existing public realm.
Chapter 11 Heritage and Tall Buildings	HE1 (8)	AM70	8. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument ~~should~~ will be carefully managed to preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets
Chapter 11 Heritage and Tall Buildings	S12 (5)	AM71	5. The suitability of sites for tall buildings within the identified areas will depend on the sensitivity of the relevant context to such proposals. Their ~~and their~~ design, height, scale and massing should ensure that they ~~take into consideration local~~ preserve and enhance the significance of heritage assets and take into consideration other ~~localised~~ factors relating to townscape character and microclimate.
Chapter 11 Heritage and Tall Buildings	11.5.1	AM72	11.5.1…These areas include relatively small parts of Smithfield, Fleet Street and the Temple~~s~~...
Chapter 11 Heritage and Tall Buildings	11.5.2	AM73	The City contains many tall buildings; some are located in clusters or as standalone features, and unusually some are also heritage assets. 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. Taking into account the policies of the plan as a whole, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.
Chapter 11 Heritage and Tall Buildings	11.5.13	AM74	Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings including a number of conservation areas partially within the Cluster itself. The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on all 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.
Chapter 11 – Heritage and Tall Buildings	S13	AM75	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
Chapter 11 Heritage and Tall Buildings	11.6.6 (a)	AM76	A revised and updated Protected Views Supplementary Planning Document (SPD) will be produced by the City Corporation, and will be informed by both public consultation and the evidence and views gathered as part of the plan making process.
Chapter 12 Open Spaces and Green Infrastructure	12.4.2	AM77	12.4.2. Barbican Estate, ~~and~~ St Alphage~~'s~~ Garden and Barber Surgeons' Garden.
Chapter 12 Open Spaces and Green Infrastructure	12.4.5	AM78	12.4.5. Biodiversity Metric (~~D~~BM) ~~4.0~~.
Chapter 13 Climate Resilience	13.2.0	AM79	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. Building design, including orientation, materiality, building servicing and greening can manage heat risk and address the urban heat island effect. 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).
Chapter 13 Climate Resilience	13.3.7	AM80	13.3.7 fitting non-return valves, positive pump devices or similar on plumbing to prevent sewer surcharge within the building.
Chapter 13 Climate Resilience	13.5.0	AM81	13.5.0 The Thames Estuary 2100 (TE2100) ~~project~~ plan and City of London Riverside Strategy recognises the need for the raising of flood defences by up to 0.5m by 2050 and ~~1m~~ a further 0.5m by 2100.
Chapter 13 Climate Resilience	13.5.1	AM82	13.5.1 Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate an appropriate and adequate minimum set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.

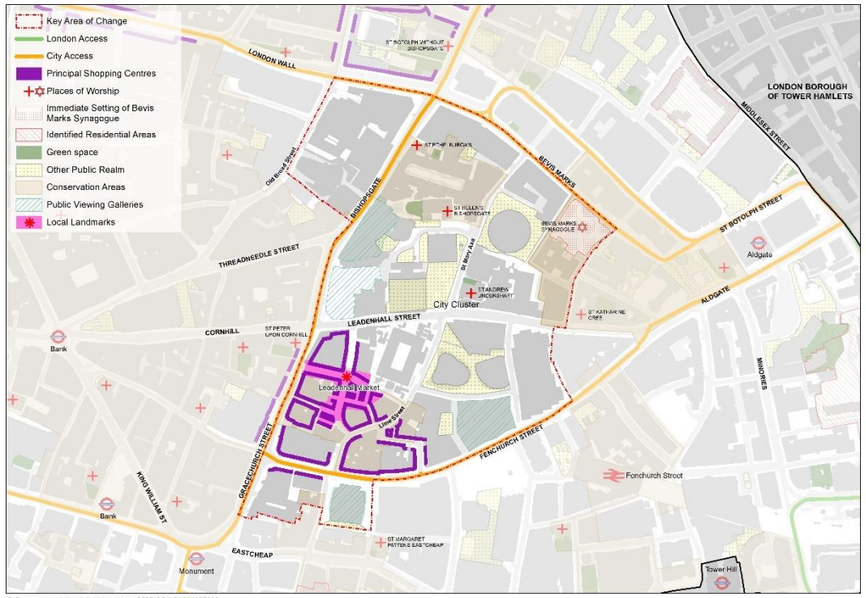
Chapter	Paragraph	AM Number	Amended text
Chapter 13 Climate Resilience	13.5.2	AM83	13.5.2 A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls in line with TE2100 requirements. Riparian owners are responsible for the maintenance ~~and enhancement~~ of flood defences.
Chapter 13 Climate Resilience	13.6.4	AM84	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. It will continue to work with the GLA, the Environment Agency and other waste planning authorities to improve waste planning, including where any surplus capacity is identified. The City Corporation will monitor waste movements to waste locations outside London and share the data with the GLA regularly.
Chapter 13 Climate Resilience	13.7.7	AM85	13.7.7 The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation, the Thames Estuary Partnership 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, and with Network Rail for any potential movement by rail.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figure 21 and Figure 22	AM86	*Amendment to Figures 21 and 22 to update the City Flood Risk Area as per latest Environment Agency data.* 

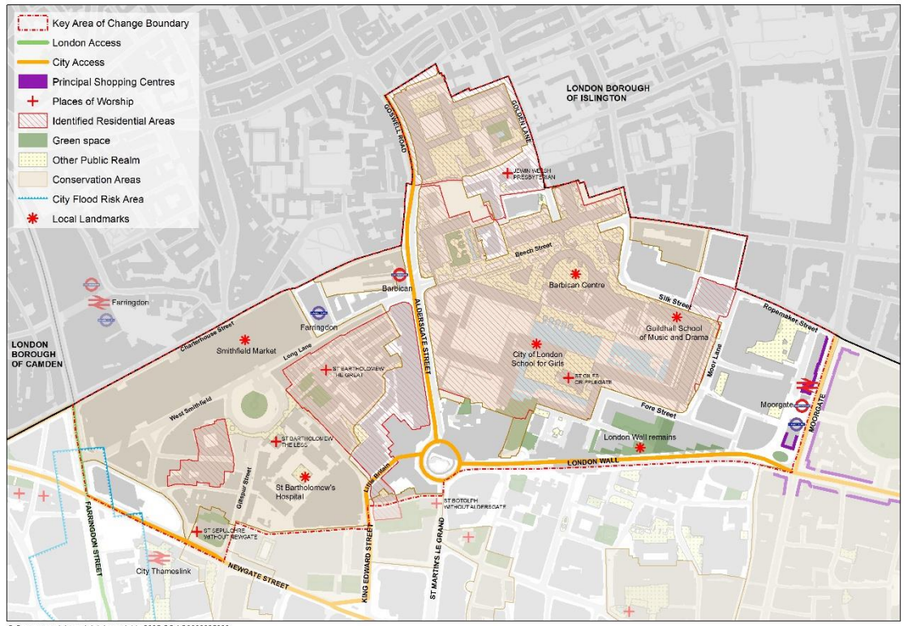
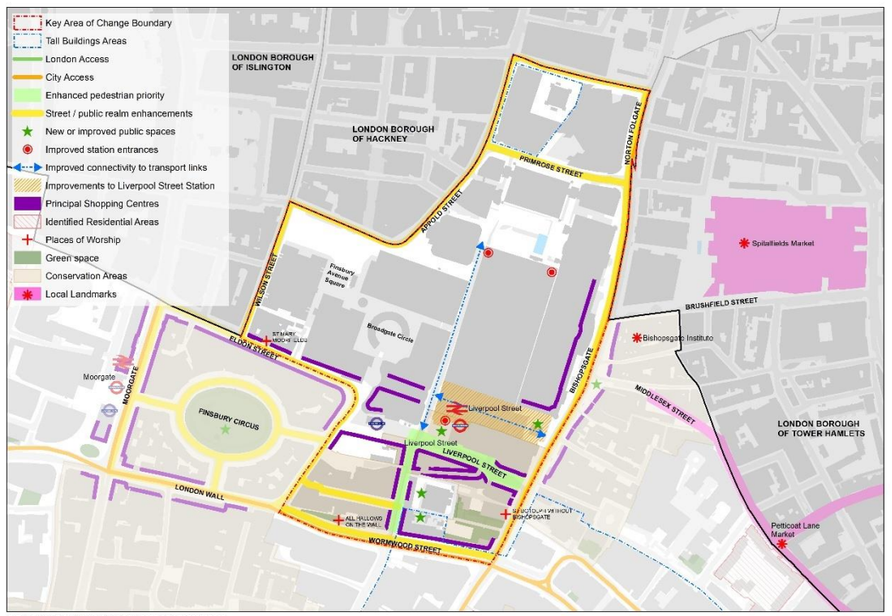
Chapter	Paragraph	AM Number	Amended text
			
Chapter 14 Temple, Thames Policy Area and KOAC	TP1	AM87	TP1 The City Corporation will continue to support the unique functions of the Inner and Middle Temples~~s~~ as places of education and training and providers of common and collegiate facilities for barristers and students, including providing professional accommodation f~~or barristers~~ <u>to support the Bar and maintain the Temple area</u>.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	TP1	AM88	Within the Temple, ~~adjustments~~ <u>changes of use</u> 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.
Chapter 14 Temple, Thames Policy Area and KOAC	14.1.1	AM89	14.1.1 The Inner and Middle Temple has a strong collegiate atmosphere due to the mix of workspaces, residential, commercial and communal uses. <u>Temple Church makes a significant contribution to the history and character of the Temple</u>. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.
Chapter 14 Temple, Thames Policy Area and KOAC	14.2.3	AM90	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, <u>the Thames Estuary Partnership</u>, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.
Chapter 14 Temple, Thames Policy Area and KOAC	14.5.2	AM91	14.5.2…while there have been significant improvements~~, most notably the removal of the Aldgate Gyratory~~ and…
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figures 21-24	AM92	*Figures 21-24 to make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches:* • *St Mary Somerset, Upper Thames Street – Figures 21 and 22 (S18 Blackfriars)* • *St Dunstan-in-the-East, St Dunstan's Hill – Figures 23 and 24 (S19 Pool of London)* • *St Botolph without Bishopsgate – Figures 27 and 28 (S21 City Cluster)*

Chapter	Paragraph	AM Number	Amended text
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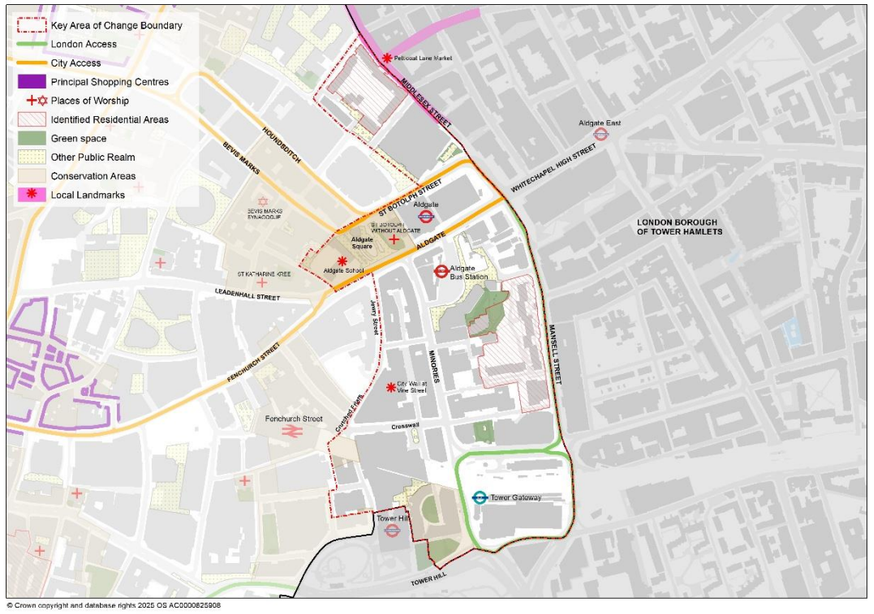
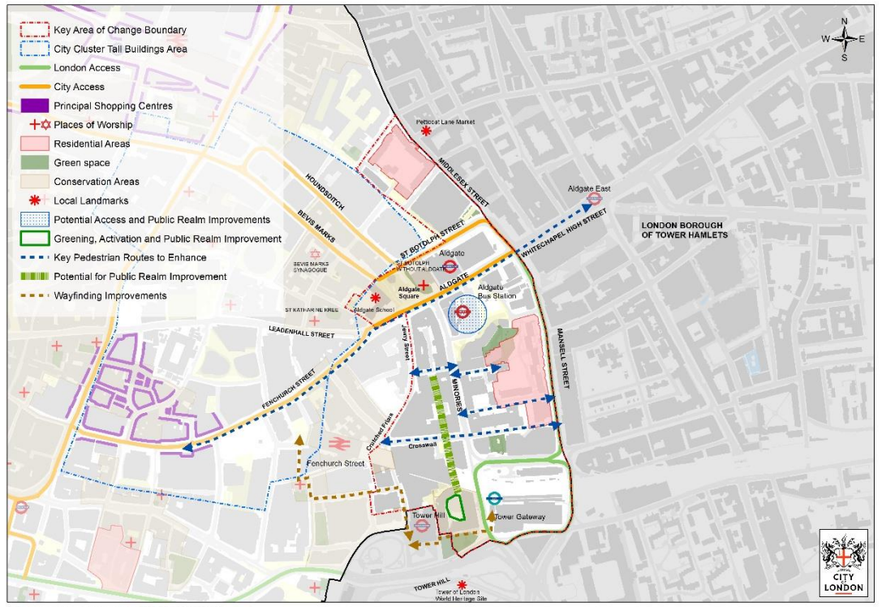
Chapter	Paragraph	AM Number	Amended text
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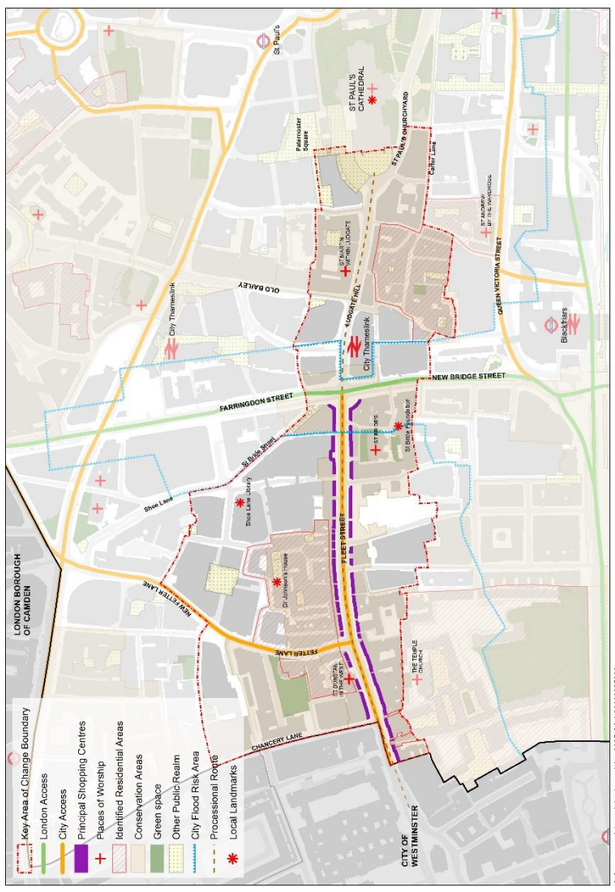
Chapter	Paragraph	AM Number	Amended text
			 
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 27	AM93	*Revise Figure 27: Fenchurch Street station is mislabeled as Cannon Street station*

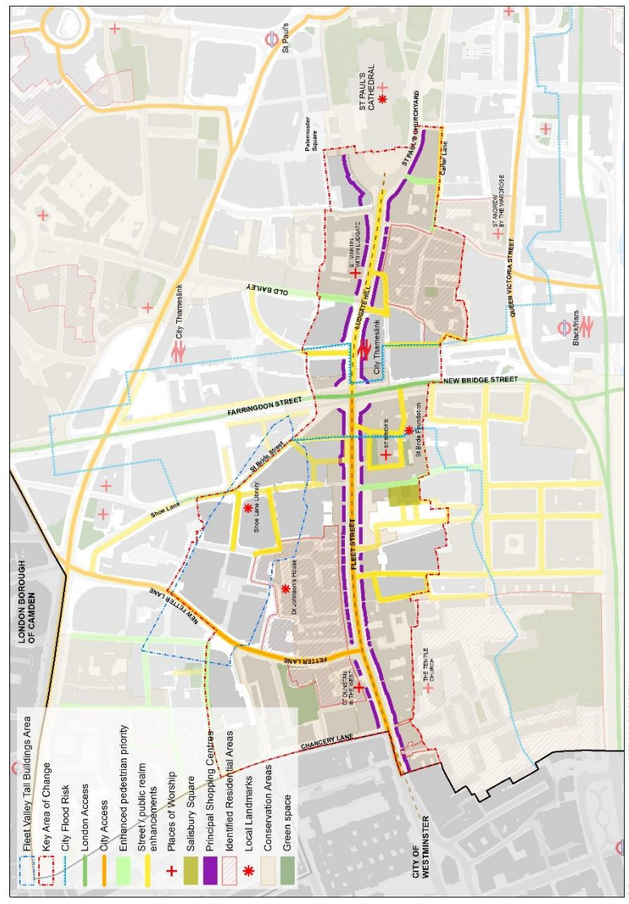
Chapter	Paragraph	AM Number	Amended text
			 © Crown copyright and database rights 2025 OS AC0000825908
Chapter 14 Temple, Thames Policy Area and KOAC	14.7.1	AM94	14.7.1 The area is an established legal cluster, focused on the Temples ~~s~~ in the City…
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (2)	AM95	2. Ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, and enhancements to wayfinding, legibility and accessibility in the Barbican area whilst seeking to preserve privacy, security and noise abatement for residents and businesses;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (9)	AM96	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
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (8)	AM97	8. Requiring improvements to pedestrian and cycle routes for all within and through the north of the City, including through improvements to wayfinding;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (11)	AM98	11. Encouraging a diverse leisure, retail, food and beverage offer, particularly along Long Lane ~~routes~~ between the London Museum and the Barbican;
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.2	AM99	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. The Forum is in the process of preparing a Neighbourhood Plan for the designated neighbourhood area.
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.7	AM100	14.8.7 …and will work closely with the Culture Mile BID to deliver public realm and cultural activation.
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 31	AM101	*Figure 31- Error correction in location of open space on Moor Lane*

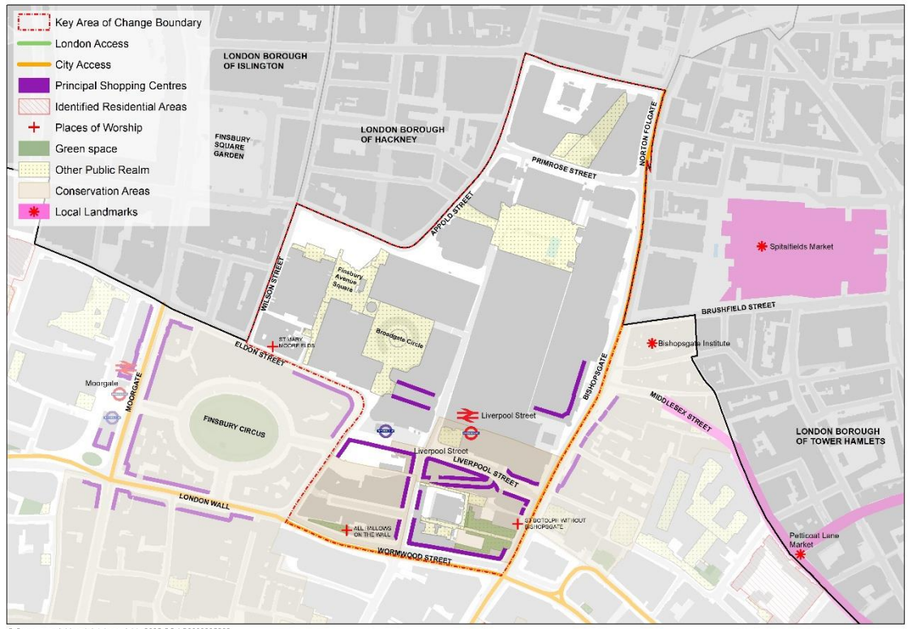
Chapter	Paragraph	AM Number	Amended text
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Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25 (10)	AM102	10. ~~Improving~~ Transforming the overall user experience, permeability, accessibility and capacity of Liverpool Street Station, and its surroundings in support of its role as a key element of national infrastructure and gateway to the City of London and driver of economic growth, including enhancing step free access and improving entry points…
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figure 34	AM103	*Add the Broadgate Tall Building Site*  © Crown copyright and database rights 2025 OS AC0000825908

Chapter	Paragraph	AM Number	Amended text
Chapter 15 Implementation	15.2.2	AM104	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 will be assessed on a site-by-site basis, in liaison with the City of London Police, particularly within and in close proximity to ~~measures in~~ the City Cluster, in line with the policies set out in this Plan.
Glossary		AM105	**City Landmarks** • Cannon Street Station (towers) • Central Criminal Court (dome), Old Bailey • Guildhall (roof and flêche), Guildhall Yard • Former Port of London Authority Building (tower), 10 Trinity Square • Royal Exchange (Tower) • Great Arthur House, Golden Lane Estate • Barbican Towers **Strategic Landmarks within the City** • St Paul's Cathedral • The Monument
Glossary	n/a	AM106	**Neighbourhood Forum -** a group which has been designated under the neighbourhood planning process for a specific designated neighbourhood area. A neighbourhood forum has the ability to prepare a Neighbourhood Plan. It is a statutory consultee on planning applications and depending on the status of the Neighbourhood Plan, will be consulted on the allocation of a proportion of Neighbourhood CIL receipts for applications permitted within its area.
Glossary	n/a	AM107	**Wider Environmental Sustainability benefits-** measures related to minimising carbon emissions or improving climate resilience that make a significant contribution towards the wider environmental sustainability of the City, going beyond what would otherwise be expected.
Appendices	n/a	AM108	*In the Table of Contents and within the section.* ~~Appendicies~~ Appendices
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change		AM109	*Amend Figures 25, 26, 29, 30, 33 to make reference to 'local landmarks' rather than 'key landmarks'*

Chapter	Paragraph	AM Number	Amended text
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St Paul's
ST PAUL'S CATHEDRAL
Paternoster Square
St Paul's Churchyard
Cathur Lane
ST ANDREW BY THE WARDROBE
QUEEN VICTORIA STREET
Blackfriars
OLD BAILEY
City Thameslink
NEW BRIDGE STREET
FARRINGDON STREET
St Bride Street
Shoe Lane
Shoe Lane Library
Dr Johnson's House
NEW FETTER LANE
FLEET STREET
St Dunstan in the West
The Temple
CHANCERY LANE
LONDON BOROUGH OF CAMDEN
CITY OF WESTMINSTER
Key Area of Change Boundary
London Access
City Access
Principal Shopping Centres
Places of Worship
Identified Residential Areas
Conservation Areas
Green space
Other Public Realm
City Flood Risk Area
Processional Routes
Local Landmarks
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St Paul's
ST PAUL'S CATHEDRAL
Paternoster Square
St Paul's Churchyard
Cathur Lane
ST ANDREW BY THE WARDROBE
QUEEN VICTORIA STREET
Blackfriars
OLD BAILEY
City Thameslink
NEW BRIDGE STREET
FARRINGDON STREET
St Bride Street
Shoe Lane
Shoe Lane Library
Dr Johnson's House
NEW FETTER LANE
FLEET STREET
St Dunstan in the West
The Temple
CHANCERY LANE
LONDON BOROUGH OF CAMDEN
CITY OF WESTMINSTER
Fleet Valley Tall Buildings Area
Key Area of Change
City Flood Risk
London Access
City Access
Enhanced pedestrian priority Street \ public realm enhancements
Places of Worship
Salisbury Square
Principal Shopping Centres
Identified Residential Areas
Local Landmarks
Conservation Areas
Green space
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Chapter	Paragraph	AM Number	Amended text
			

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Appendix 3- City Plan 2040: SA Addendum

September 2025

Introduction to this document

This SA addendum considers and assesses proposed changes made to the plan, known as Main Modifications which are considered necessary for soundness. It supplements the SA of the City Plan, January 2024: https://www.cityoflondon.gov.uk/assets/Services-Environment/SA-Main-Report-Reg-19b.pdf

This has been prepared to accompany the consultation on the Main and Additional modifications in December to January 2026.

Stage 1- Screening of Main Modifications to the City Plan 2040

All the modifications made to the draft City Plan 2040 have been screened to consider which changes need to be assessed in the tables below. Additional modifications are automatically screened out because by their nature they cannot make a material change to the plan's policies and therefore would not change any effects identified in the assessment.

The screening includes three broad outcomes:

- Further assessment is not considered necessary as this relates to a factual change or update.
- Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
- Further assessment required as the amendments relate to a change in the policy requirements (which may include the detailed policy text or the policy application text).

Further detail is provided against each main modification giving reasons for each conclusion reached.

Where further assessment is identified as being required this was included in the updated policy assessments in Section 2. The changes were then assessed against each sustainability objective and then the cumulative impacts.

Table 1- Screening of Main Modifications

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	By 2040 the City of London will have become: 1. **A stronger, more vibrant and competitive economy.** The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. **A 7-day-a-week destination.** The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. **A more sustainable city-** The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. **A more inclusive and healthier city-** the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. **A place where heritage and positive change are celebrated**-the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.	Further assessment is not considered necessary as the amendments add further detail to the vision, rather than amend the aims and objectives of the plan and therefore would not change the effects already identified in the assessment.
Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	*Change to include new Broadgate Tall Building Site on Key Diagram*	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, ~~and~~ the Fleet Valley and the Broadgate tall building site, which are identified as areas suitable for tall buildings.	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	Effective	HL2 (1) Developers will be required to effectively manage ~~the~~ their proposal's impact ~~of their proposals~~ on air quality. Major developments must comply with the requirements of the Air Quality SPD ~~for~~ which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	Effective	HL7 (2) Existing ~~public~~ sport and recreational facilities will be protected in situ, unless:	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	Effective	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. However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	Effective	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phrase, 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. For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	Positively prepared	2. Ensuring sufficient affordable housing is provided. Incentivising affordable housing delivery to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land; b. 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 c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and where appropriate 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.	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th><th>Screening Assessment</th></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.12</td><td>MM9</td><td>Effective</td><td>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.~~ It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</td><td>Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.</td></tr>
<tr><td>Chapter 4 Housing</td><td>New paragraph</td><td>MM10</td><td>Effective</td><td>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)

4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.

Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.

Table 2- Housing Delivery (Source City Corporation Monitoring data)

<table>
<tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr>
<tr><td>2019/20</td><td>296</td><td>Completions</td></tr>
<tr><td>2020/21</td><td>202</td><td>Completions</td></tr>
<tr><td>2021/22</td><td>433</td><td>Completions</td></tr>
<tr><td>2022/23</td><td>96</td><td>Completions</td></tr>
<tr><td>2023/24</td><td>0</td><td>Completions</td></tr>
<tr><td>2024/25</td><td>29</td><td>Completions</td></tr>
<tr><td>2025/26</td><td>41</td><td>Completions (projected)</td></tr>
<tr><td>2026/27</td><td>97</td><td>Completions (projected)</td></tr>
<tr><td>2027/28</td><td>580</td><td>Completions (projected)</td></tr>
<tr><td>2028/29</td><td>342</td><td>Completions (projected)</td></tr>
<tr><td></td><td>2,116</td><td></td></tr>
</table>
</td><td>Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.</td></tr>
</table>

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th><th>Screening Assessment</th></tr>
<tr><td>Appendix 2</td><td>New appendix</td><td>MM11</td><td>Effective</td><td>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.

*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40

<table>
<tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr>
<tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr>
<tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr>
<tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr>
<tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr>
<tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr>
<tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>Total</td><td>1,706</td><td>2,430</td><td></td></tr>
</table></td><td>Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.8</td><td>MM12</td><td>Positively prepared</td><td>4.1.8 …. 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. Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</td><td>Further assessment is not considered necessary as the amendments provide further clarity rather to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.10</td><td>MM13</td><td>Effective</td><td>4.1.10 … 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 for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40…</td><td>Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.</td></tr>
</table>

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 4 Housing	4.1.11	MM14	Effective	4.1.11 ~~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.~~	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	4.1.15	MM15	Effective	4.1.15. …The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	HS6 (2)	MM16	Effective	HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change clarifies the London Plan approach.
Chapter 5 Offices	S4 (1)	MM17	Effective	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 NIA (1,600,000 m2 GIA) net during the period 2021 to 2040, phased as follows: • 2021 – 2026 500,000m2 NIA (666,666m2 GIA) • 2026 – 2031 400,000m2 NIA (533,333m2 GIA) • 2031 – 2036 200,000m2 NIA (266,666m2 GIA) • 2036 – 2040 100,000m2 NIA (133,333m2 GIA)	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.1.1	MM18	Effective	The minimum requirement of ~~overall office floorspace target of~~ 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040…	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.3.9	MM19	Effective	5.3.9…Where a change ~~in~~ of use is proposed from office floorspace to another use,… ….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. Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. ….	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.

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<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Main modification reason</th><th>Amended text</th><th>Screening Assessment</th></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>7.1.5</td><td>MM20</td><td>Effective</td><td>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. When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</td><td>Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to the CPF, and do not change the policy requirements, therefore would not change the effects previously assessed.</td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>New paragraph after 7.3.3</td><td>MM21</td><td>Effective</td><td>New paragraph 7.3.4

Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.

<table><tr><td></td><td>On Site</td><td>Off Site</td></tr><tr><td>> 10,000sqm gross floorspace</td><td>Yes. Provision will be commensurate with the scale of development</td><td>Not acceptable</td></tr><tr><td>< 10,000sqm gross floorspace</td><td>Preferred. Provision will be commensurate with the scale of development</td><td>Yes if a specific project has bee
Provision can be through a dire
intervention to support the pr
through a financial contributio
paragraph 7.3.5, financial cont
be pooled.</td></tr></table></td><td>Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to scale, and do not change the policy requirements, therefore would not change the effects previously assessed.</td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>CV4 (2)</td><td>MM22</td><td>Effective</td><td>CV4 (2) Do not result in unacceptable adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts</td><td>Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.</td></tr>
<tr><td>Chapter 8 Infrastructure</td><td>IN2</td><td>MM23</td><td>Effective</td><td>1. Development must not lead to capacity or reliability issues in the surrounding area and should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers ~~capacity projections must take into account the impacts of climate change which will influence future infrastructure demand~~.

2. Developers are required to ~~demonstrate, through effective engagement with~~ provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.

3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, ~~which may require the provision of~~ and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy clauses 2 and 3 renumbered.</td><td>Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change provides clarity through reference to separate statutory regime covering the sewerage and water supply network, to ensure responsibilities for developers and infrastructure providers are made clear.</td></tr>
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Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 9 Design	9.1.0	MM24	Effective	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, retrofitted and refurbished buildings.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.3	MM25	Effective	9.1.3 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 life-cycle carbon of different development approaches.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental sustainability benefits for the site, its context and the whole City before considering ~~the many wider~~ other 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.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.1.5	MM27	Effective	9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (1)	MM28	Effective	DE1 (1) Development proposals should ~~follow~~ adopt a retrofit first approach~~, thoroughly exploring the potential for retaining and retrofitting.~~ At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (3)	MM29	Effective	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment at planning stage and post construction.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to whole life carbon assessments and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (7)	MM30	Effective	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. Retention, refurbishment, retrofit and reuse ~~Reuse, refurbishment and retention~~ of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 9 Design	DE1 (8)	MM31	Effective	DE1 (8) Proposals for major development will be required to: a. 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.~~ The adaption to climate change credit Wst 05 must be achieved in the waste category; ~~b. Commit to achieving a minimum NABERS UK rating of 5 stars;~~ Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); c. Demonstrate that London Plan guidance on operational carbon emissions and air quality requirements have been met on site.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.0	MM32	Effective	9.2.0 Materials – ~~retaining~~ reducing embodied carbon emissions from new build construction through retrofit and ~~in existing buildings and materials, and improving~~ resource efficiency.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.9	MM33	Effective	9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) 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. - A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period. - 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~~ be at least Air Quality Neutral, in line with the City of London Air Quality SPD. - Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole. ~~which has been incorporated to address environmental challenges.~~ - 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. - Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options…	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 9 Design	9.2.9	MM34	Effective	9.2.9 ~~**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. • For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	DE4 (3)	MM35	Effective	3. Requiring all tall buildings ~~or major developments~~ to provide free to enter….	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	VT3 (4)	MM36	Effective	4. All off-street non-residential bays for car parking facilities must be equipped with active electric vehicle charging points usable from the outset.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT1 (c)	MM37	Effective	AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT3 (2)	MM38	Effective	AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 10 Transport	10.10.1	MM39	Effective	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 10 Transport	10.10.2	MM40	Effective	10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises. *Existing wording in 10.10.2 to move to 10.10.3, etc.*	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	Effective	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~~ sought where appropriate;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area. 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.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	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 historic environment, townscape and skyscape, including their cumulative effects.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	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 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 thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance. Applicants should draw reference to the Character Areas Study and the Setting Study (where appropriate) to understand their site's significance and the key attributes of significance they should consider	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements, instead reflecting how Setting Study will be utilised. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	Effective	11.3.8 On sites where significant archaeological artefacts <u>or features</u> 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.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	Effective	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted</u>.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	Effective	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 (<u>City Cluster, Fleet Valley and Broadgate site</u>) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	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 <u>respects both heritage significance and</u> townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and their ~~immediate and wider~~ settings.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	For the purposes of Policy D9 of the London Plan, the ~~The~~ tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building Site 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 new 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, new tall buildings, particularly on sites where there is no tall building currently, would be likely to have 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.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	11.5.6 The heights of the buildings in the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building site 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~~ These 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.~~	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	*Change to show new Broadgate Tall Building Site as an area suitable for tall buildings*	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	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 historic environment, townscape and skyscape, including their cumulative effects.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	*New paragraph after 11.5.12 (and renumber after)* On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	*Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours*	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site and amendments to the contours at SE corner of City Cluster. Note- assessed under the Key Diagram change.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	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 and the settings of historic City landmarks and skyline features;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	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 and appropriate, including through the design of public realm and sustainable drainage systems. This can ~~Can~~ take many forms and require careful design, installation and regular maintenance.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	S15	MM59	Effective	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 address the impacts of the urban heat island effect; ~~2.~~ 3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding; ~~3.~~ 4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and ~~4.~~ 5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to over-heating. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	13.1.2-3	MM60	Effective	13.1.4 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. 13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	CR1	MM61	Effective	2. ~~Building designs should minimise any contribution to the urban heat island effect.~~ Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 13 Climate Resilience	13.2.2	MM62	Effective	~~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.~~ 13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	Effective	6. Ensuring development proposals have regard to the ~~immediate~~ setting of Bevis Marks Synagogue (~~as set out in the Policy Map~~).	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	Effective	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;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	Effective	~~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;~~	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	Effective	12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	Effective	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.
Chapter 15 Implementation	Policy S26	MM68	Effective	(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations. *Renumber parts 2 and 3.*	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

The above process has identified the need for further appraisal of the following policies and their supporting text:

- Policy AT3 Cycle Parking
- Policy S12 Tall Buildings
- Key Diagram (other Figures) - identification of new Tall Building site at Broadgate and contour amendments at SE corner of City Cluster

Stage 2- Updated policy assessments

The amendments to the plan identified as having potential implications for the assessment are listed below. The submission policy assessment has been included alongside that with amendments. The commentary sets out the implications for the change on each sustainability objective.

Interpretation of results: Keys

This appraisal shows the changes to the plan under the MMs against each of the sustainability objectives of the SA. It reproduces the information from the initial appraisal and utilises the same key to highlight any changes to the assessment as a result. Where a change from the previous assessment is identified this is identified as a change through 'C'.

Key from 2024 Sustainability Appraisal:

	Impact of implementing policy	Response to SA assessment
↑	Significant positive effect	Consider whether further enhancement is possible
↑	Positive effect	Consider whether further enhancement is possible
↕	Uncertain effect	Consider policy wording changes and/or mitigation and monitoring
↑↓	Both positive and negative effect (minor rather than significant)	Consider policy wording changes and/or mitigation and monitoring
↓	Negative effect	Consider policy changes and/or mitigation
↓	Significant negative effect	Consider changing the policy
-	Negligible effect	

2025 Key

SP	Strong positive effect
P	Positive effect
N	Negative effect
P/N	Both positive and negative effects
U	Uncertain effect
C	Change to previous effect

Modification Assessment 1- Policy AT3: Cycle Parking

Main Modification numbers: MM38-40.

Sets out circumstances where cycle provision below the London Plan standards may be acceptable, including where extensive basement excavation would be required to meet the standard, with embodied carbon implications. Change highlights that where applicable this will be secured through S106 and will be proportionate to the under-provision. Sets out temporary use of cycle provision for other uses may also be acceptable where a lack of demand has been identified, to be monitored through Travel Plans.

Table 3- Policy AT3 Cycle Parking

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P/N	P			P	P			P			P		SA identifies effects of draft policy in relation to: • Facilitating active travel reduces emissions from vehicles. • Provision of conveniently located, easily accessible, safe and secure changing facilities and cycle parking encourages active travel. • Reduces space for offices but attracts City workers. • Keeps streets clear for short-stay cycle parking. • Provides secure cycle storage – reduced opportunity for theft. • Cargo bikes making deliveries could cause congestion on pavements. • Could mention facilities needed for folding bikes and scooters. • Need monitoring of cycle parking use to check whether space continues to be available for cycle parking
Submission policy with modifications	P	U	P			P	P			U			U		Reduced cycle parking provision could have some further positive effects through reduction of embodied carbon in development through reduced basement excavation and throughout the course of the development's lifetime. As demand for cycle parking may fluctuate it could have impacts on active travel uptake or involve congestion within the public realm from on-street cycle parking. Use of space for other economic functions could have some positive impacts on the economy.
Commentary	**C**	**C**								**C**			**C**		Changes to the assessment identified the following changes- • Economic growth- potentially positive • Built environment and public realm - uncertain • Transport and movement - uncertain • Health- uncertain

Modification Assessment 2- Broadgate tall building site

Main Modification numbers: MM2, MM3, MM52-53, MM56

Introduces a new tall building site at Broadgate and contour changes at the SE corner of the City Cluster. To be inserted into the Key Diagram and Figures 14 and 15. Reference to this site also to be added to Section 2.1, S12 (1), paragraph 11.5.4, 11.5.6

Table 4- Key Diagram and other changes for new Broadgate tall building site

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA		P		U											The assessment identifies potential effects on two objectives with the following: • Tall buildings will be focused in the City Cluster and Fleet valley, which are identified as areas suitable for tall buildings. • Managing the location of tall buildings improves the quality and appearance of the built environment, whilst also protecting views
Submission policy with modifications	P	P		P/N											Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Given the extensive Strategic Views Impact Assessment and Heritage Impact Assessment testing, the additional identification and SE contour changes are not expected to amend the previous assessment in relation to effects on the built environment, public realm or heritage assets.
Commentary	**C**			**C**											Changes to the assessment identified the following change- • Economic growth- potentially positive

Modification Assessment 3- Policy S12 Tall Buildings

Main Modification numbers: MM48-51, MM54-55

Changes to Policy S12 relate to:

- Specific reference to the new Broadgate tall building site within part 2) and the supporting text at 11.5.4 and 11.5.6 as being ‘suitable for a tall building’
- Part 3) to make reference to the design to respect heritage significance and their settings
- Making explicit that new tall buildings outside the identified locations are likely to have significant impacts on heritage assets
- Making clear that the existence of a tall building on a site outside the identified locations is likely to be a material consideration in planning decisions, and that retrofitting may be appropriate subject to meeting other policy requirements
- To make clear the City Corporations expectations and use of models and visualisations in relation to the historic environment and their cumulative impacts

Table 5- Policy S12 Tall Buildings

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P	P	P		P		P		P		P	P		SA identifies effects of draft policy in relation to: • Constraints on development of tall buildings could reduce the City's economic growth potential. Policy S12 encourages tall buildings in areas identified as appropriate, while also identifying areas where tall buildings would be inappropriate, including areas covered by strategic and local views. • Additional constraints on development of tall buildings could reduce economic growth but the backdrops to St Paul's Cathedral and the Tower of London is already protected by Local View Management Framework views so the impact is likely to be limited. • Managing the location of tall buildings improves the quality and appearance of the built environment with consideration given to the City 's skyline • Tall buildings must have regard to the character and amenity of their surroundings, including the relationship with existing and consented tall buildings. • Policy applies with the Civil Aviation Authority's maximum height limit of tall buildings for the safety of international flights. 6. Tall buildings must have regard to the significance of heritage assets and their immediate and wider settings. • National and international impact – protects outstanding universal value of UNESCO World Heritage Site. • Integrating development within the existing context, taking into account form, mass, and height, to enhance the overall townscape character. • Policy seeks to protect the public realm from environmental impacts and ensure safe and comfortable levels of wind shear, daylight and sunlight, solar glare, solar convergence, overshadowing. • Policy looks to protect existing open spaces while providing new spaces inside and at the top of buildings. • Promotes accessible building design which will improve the inclusivity of the City. • Policy seeks to improve public realm, with active frontages at ground level and adequate space between buildings to provide a positive pedestrian experience. • Consideration of the views of the city designated by other Local Planning Authorities will promote consistency in preserving protected views. • Achieve exemplar standard of architectural quality, making a positive contribution to the townscape character. • Active frontages at ground floor level to contribute towards a positive pedestrian experience

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission policy with modifications	P	P	P	P/N		P		P		P		P	P		Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Although additional wording sets out additional protection for heritage assets and their consideration in relation to tall buildings, the plan seeks to minimise the potential for harm; consideration of any harm will still be required on relevant applications and heritage assets and their setting have protections in both other Development Plan policies and legislation.
Commentary	**C**			**C**											Changes to the assessment identified the following change- • Economic growth- potentially positive

Cumulative impacts

The cumulative impacts of all the policy modifications have also been assessed against each objective.

Objective	AT3	Key Diagram	S12	Commentary	Mitigation
Economic Growth	P	P	P	Changes in combination are likely to lead to additional floorspace dedicated to economic development within the city. This will have a likely positive effect on economic development objective.	None required.
Built environment and public realm	U			Potential flexibility in cycle parking standards could have some uncertain impacts on public realm depending on the uptake of cycling, other modes of travel and capacity of the provision on street and within the development.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required.
Safe environment and crime reduction					
Heritage Assets		P/N	P/N	Changes to the locations identified as suitable for tall buildings to include a new site at Broadgate and amendments at the SE corner have potential for some positive and negative impacts on heritage assets.	Policy requires use of models, assessment of impacts on individual heritage assets on a site by site basis
Water Management					
Environmental protection					
Climate mitigation and resilience					
Open Spaces					
Biodiversity and urban greening					
Transport and movement	U			Changes to provision of cycle parking could have uncertain impacts on transport and movement.	Other policies relate to supporting healthy streets approaches.
Housing					
Social and cultural facilities					
Health	U			Provision of cycle parking has potentially uncertain impacts on health, depending on the uptake of active travel modes as a result.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required. Other policies relate to health and wellbeing.
Education					

Mitigation measures

In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce any negative effects. Some of the effects of policy changes are uncertain

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Appendix 4 Atlas of Change: City Plan 2040

As part of the Local Plan suite of documents, the Policies Map provides illustrations of site-specific policies. The current policies map was adopted in 2015 and can be accessed here – City of London Web Mapping

The Atlas of Change provides an illustrative tool to set out where changes across the City have occurred during the Examination in Public process. The Atlas of Change in addition to the Policies Maps Changes (LD11) prepared in March 2024, includes all of the proposed changes to the policies maps. Once the Local Plan has been found sound through an Examination in Public, the Corporation will adopt and publish a new Policies Map to support the new local plan.

The proposed amendments to the Policies Map are limited to Tall Buildings.

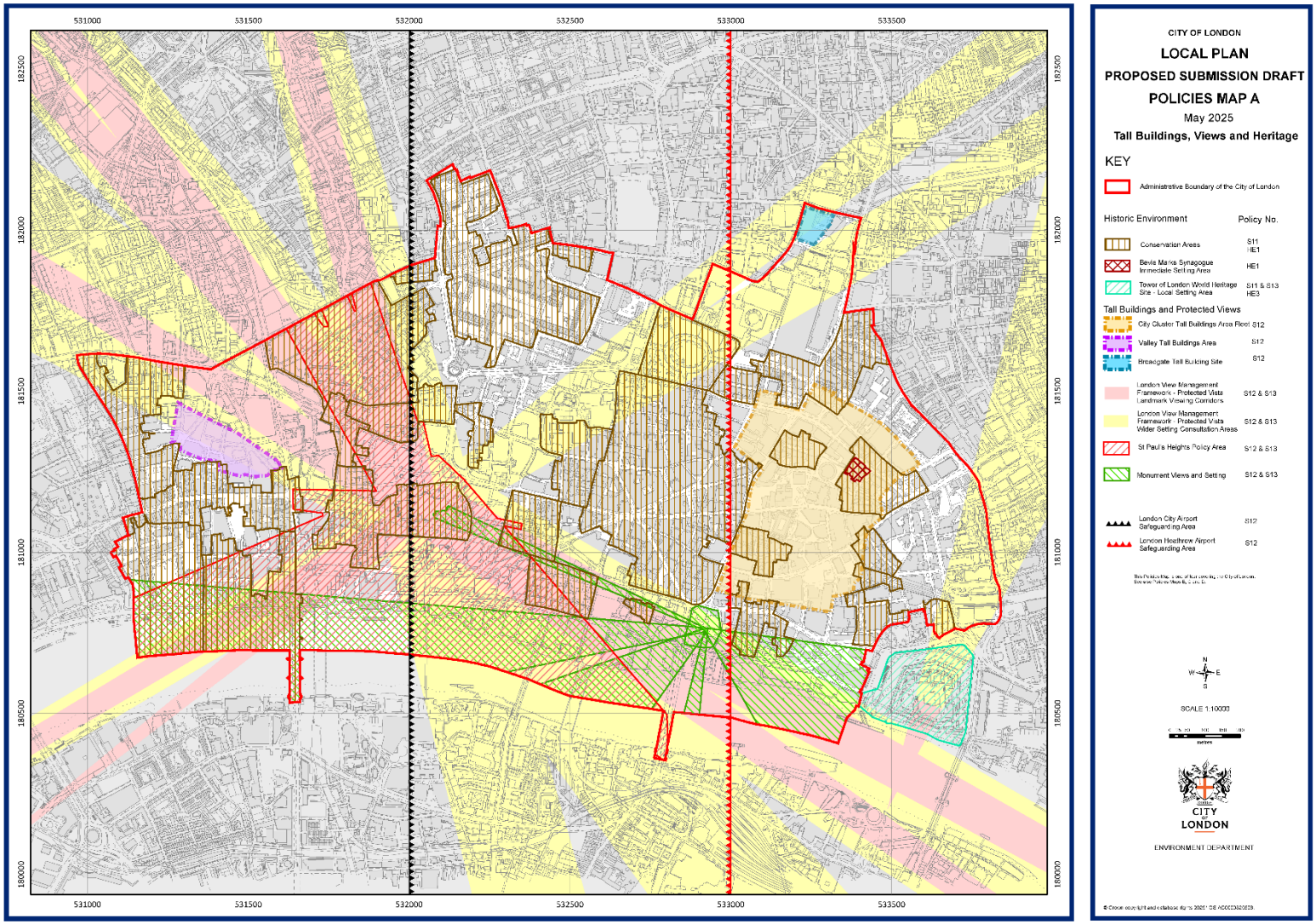
The table below sets out each of the amendments proposed to be made to the Policies Maps as proposed. Following the table below, the mapping provided sets out spatially where proposed changes would be made.

Change no.	Topic	Address	Change	Reason	Map reference
PM1	Tall buildings	Broadwalk House	*Create a new Broadgate Tall Building Site on the tall building layer*	*New tall building site was promoted during the Examination*	Policies Map A
PM2	Tall buildings	1-2 Minster Court	*Minor amendments over this site to create the heights of between 90m –100m and 100m-120m.*	*Location and description of the changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and*	Policies Map C

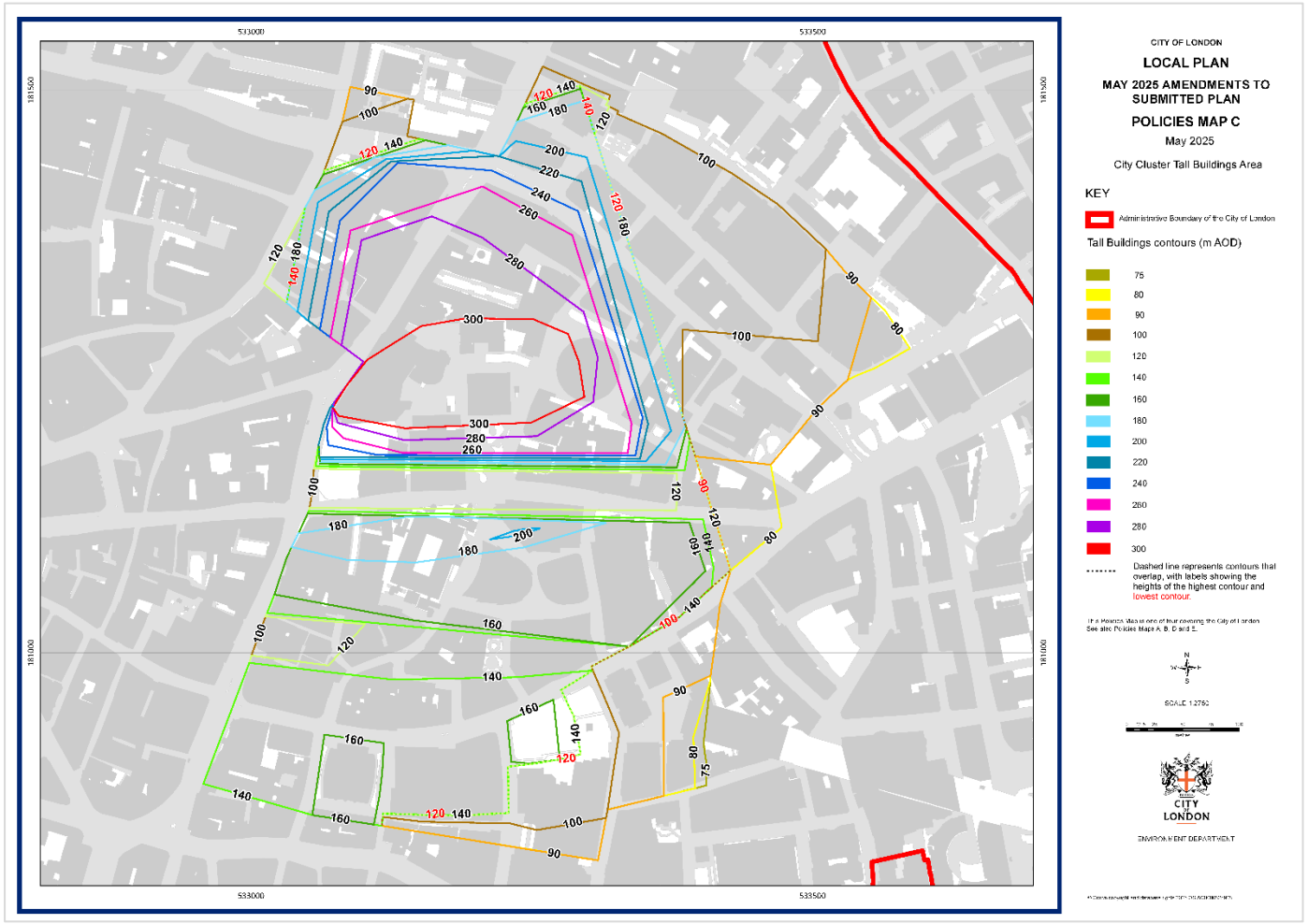
				Heritage Impact Assessment (HTB36-40).	
PM3	Tall buildings	New London House	*Minor amendments over this site to create the heights of between 75m –80m and 80m-90m.*	*Location and description of the changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and Heritage Impact Assessment (HTB36-40).*	Policies Map C
PM4	Tall buildings	30 Fenchurch Street	*Minor amendments over this site to create the heights of between 100m – 120m and 120m – 140m.*	*Location and description of the potential changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and Heritage Impact Assessment (HTB36-40).*	Policies Map C
PM5	Tall buildings	Broadwalk House	*Amendments to the contours to include new Broadgate Tall Building Site.*	*A new policy map shows the proposed contours. This has been subject to further Strategic View Impact*	Policies Map E *new*

				Assessment and Heritage Impact Assessment (HTB36-40).	

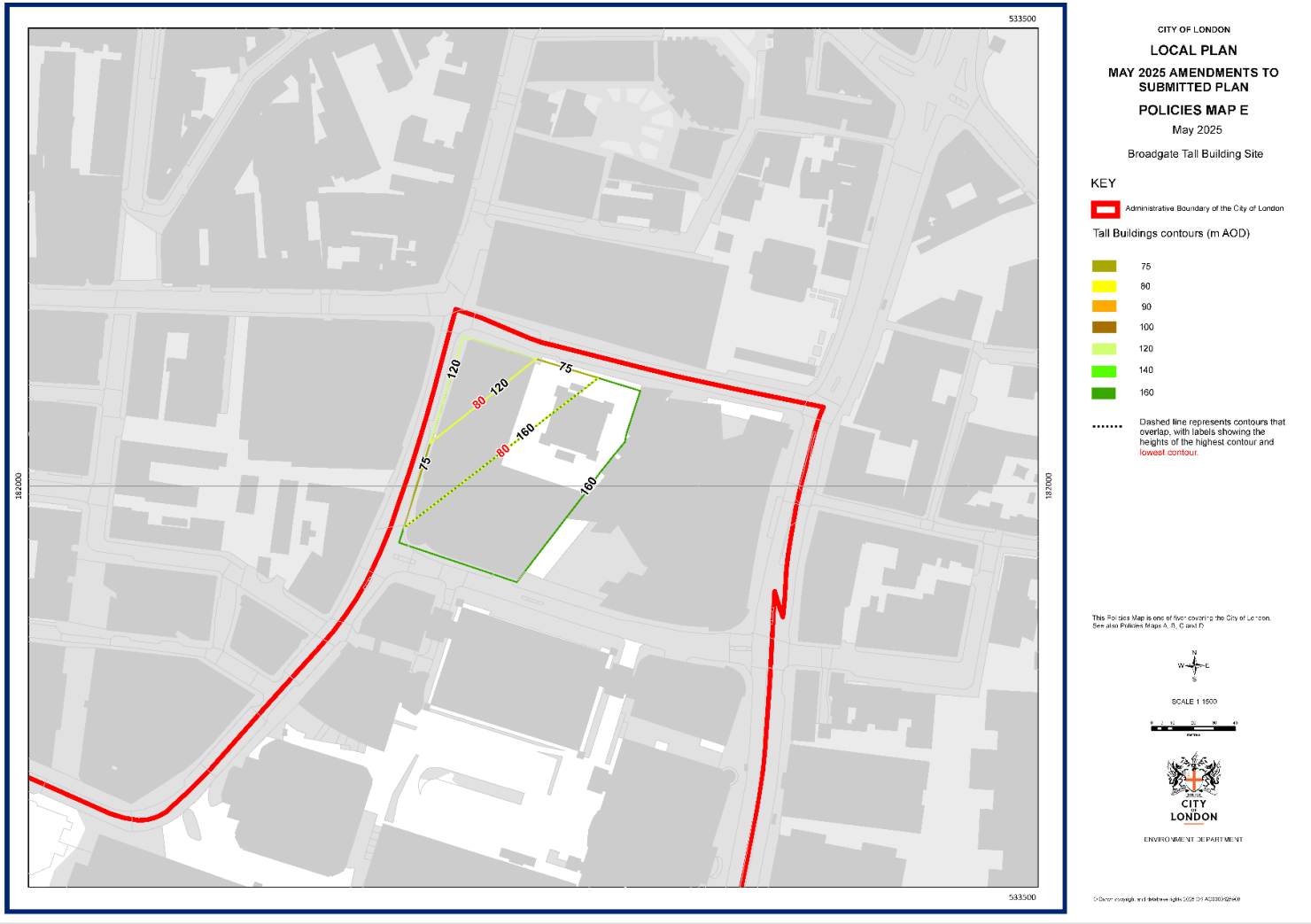
PM1


531000
531500
532000
532500
533000
533500
182500
182000
181500
181000
180500
180000
CITY OF LONDON
LOCAL PLAN
PROPOSED SUBMISSION DRAFT
POLICIES MAP A
May 2025
Tall Buildings, Views and Heritage
KEY
Administrative Boundary of the City of London
Historic Environment
Policy No.
Conservation Areas
S11
HE1
Bevis Marks Synagogue Immediate Setting Area
HE1
Tower of London World Heritage Site - Local Setting Area
S11 & S13
HE3
Tall Buildings and Protected Views
City Cluster Tall Buildings Area Fleet
S12
Valley Tall Buildings Area
S12
Broadgate Tall Building Site
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
N
W
E
S
SCALE 1:10000
metres
CITY LONDON
ENVIRONMENT DEPARTMENT

PM2, PM3, PM4


533000
533500
181500
181000
CITY OF LONDON
LOCAL PLAN
MAY 2025 AMENDMENTS TO SUBMITTED PLAN
POLICIES MAP C
May 2025
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.
SCALE 1:2750
CITY LONDON
ENVIRONMENT DEPARTMENT

PM5


533500
182000
182000
533500
120
80
120
75
75
80
160
160
CITY OF LONDON
LOCAL PLAN
MAY 2025 AMENDMENTS TO SUBMITTED PLAN
POLICIES MAP E
May 2025
Broadgate Tall Building Site
KEY
Administrative Boundary of the City of London
Tall Buildings contours (m AOD)
75
80
90
100
120
140
160
Dashed line represents contours that overlap, with labels showing the heights of the highest contour and lowest contour.
This Policies Map is one of five covering the City of London. See also Policies Maps A, B, C and D
N
W
E
S
SCALE 1:1500
CITY OF LONDON
ENVIRONMENT DEPARTMENT

Appendix 5- City Plan 2040 HRA Review

September 2025

Introduction to this document

The Appropriate Assessment (2024) identified at paragraph 6.5 that "The Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites."

The Main Modifications to the City Plan make some amendments to the policies assessed within the Screening and the Appropriate Assessment. Therefore a review of these changes is necessary to conclude whether they have any implications on the conclusions within the Assessment.

Stage 1- Screening of Main Modifications to the City Plan 2040

The first stage in the HRA Review has been to review the Main Modifications to the City Plan against the previous conclusions of the HRA Screening to identify if the changes could have any impact upon the conclusions reached. Where policies had previously been 'screened' into the Appropriate Assessment this was identified within the table and further assessment was required at Stage 2.

The results of this identified that the following policies which were screened in had some changes made to them through the Main Modifications:

- S3: Housing
- HS6: Student accommodation
- S4: Offices
- CV4: Hotels
- HL7: Sport and recreation

Table 1- HRA Review of Main Modifications

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 1 Strategic Priorities	City Plan Vision	MM1	By 2040 the City of London will have become: 1. **A stronger, more vibrant and competitive economy.** The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. **A 7-day-a-week destination.** The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. **A more sustainable city-** The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. **A more inclusive and healthier city-** the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. **A place where heritage and positive change are celebrated**-the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.	Chapter 1 Strategic Priorities: Assessment screened the policies which stem down from the priorities. No change.	None
Chapter 2 Spatial Strategy	Key Diagram	MM2	*Change to include new Broadgate Tall Building Site on Key Diagram*	Chapter 2 Spatial Strategy: Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 2 Spatial Strategy	2.1 (10)	MM3	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, ~~and~~ the Fleet Valley and the Broadgate tall building site, which are identified as areas suitable for tall buildings.	Chapter 2 Spatial Strategy: Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	HL2 (1) Developers will be required to effectively manage ~~the~~ their proposal's impact ~~of their proposals~~ on air quality. Major developments must comply with the requirements of the Air Quality SPD ~~for~~ which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).	HL2: Policy seeks to avoid adverse impacts on air quality from new development but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	HL7 (2) Existing ~~public~~ sport and recreational facilities will be protected in situ, unless:	HL7: Leisure development as likely activity. If implemented effects on air pollution and changes in water quality/quantity. Policy permits sport and recreation facilities and therefore, could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.	'Smaller contribution' to air pollution identified in section 4.39 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	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. However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.	HL7: As above	As above
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phrase, 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. For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.	HL9: Policy sets requirements for new major development to undertake a rapid Health Impact Assessment and submit a full HIA for developments subject to an Environmental Impact Assessment or where the development could have health impacts and will not itself result in development. No likely potential effects or need for scoping into the AA.	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	2. Ensuring sufficient affordable housing is provided. Incentivising affordable housing delivery to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land; b. 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 c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and where appropriate 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.	S3: Residential development. Potential effects on water quality or quantity. Policy seeks to protect existing housing and provide additional housing in or near identified residential areas (1,706 residential units between 2025/26 and 2039/40). This will contribute to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	'Main contributions' to water quantity and quality identified in section 4.40 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 4 Housing	4.1.12	MM9	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.~~ It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.	Chapter 4 Housing: as above	As above

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Amended text</th><th>HRA Assessment conclusion (2024)</th><th>Impact</th></tr>
<tr><td>Chapter 4 Housing</td><td>New paragraph</td><td>MM10</td><td>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)

4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.

Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.

Table 2- Housing Delivery (Source City Corporation Monitoring data)

<table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td>2019/20</td><td>296</td><td>Completions</td></tr><tr><td>2020/21</td><td>202</td><td>Completions</td></tr><tr><td>2021/22</td><td>433</td><td>Completions</td></tr><tr><td>2022/23</td><td>96</td><td>Completions</td></tr><tr><td>2023/24</td><td>0</td><td>Completions</td></tr><tr><td>2024/25</td><td>29</td><td>Completions</td></tr><tr><td>2025/26</td><td>41</td><td>Completions (projected)</td></tr><tr><td>2026/27</td><td>97</td><td>Completions (projected)</td></tr><tr><td>2027/28</td><td>580</td><td>Completions (projected)</td></tr><tr><td>2028/29</td><td>342</td><td>Completions (projected)</td></tr><tr><td></td><td>2,116</td><td></td></tr></table></td><td>S3: as above.</td><td>As above</td></tr>
</table>

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Amended text</th><th>HRA Assessment conclusion (2024)</th><th>Impact</th></tr>
<tr><td>Appendix 2</td><td>New appendix</td><td>MM11</td><td>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.

*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40

<table>
<tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr>
<tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr>
<tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr>
<tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr>
<tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr>
<tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr>
<tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr>
<tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr>
<tr><td>Total</td><td>1,706</td><td>2,430</td><td></td></tr>
</table>
</td><td>S3: as above</td><td>As above</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.8</td><td>MM12</td><td>4.1.8 …. 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. Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</td><td>Chapter 4 Housing: as above</td><td>As above</td></tr>
<tr><td>Chapter 4 Housing</td><td>4.1.10</td><td>MM13</td><td>4.1.10 … 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 for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40…</td><td>Chapter 4 Housing: as above</td><td>As above</td></tr>
</table>

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 4 Housing	4.1.11	MM14	4.1.11 ~~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.~~	Chapter 4 Housing: as above	As above
Chapter 4 Housing	4.1.15	MM15	4.1.15. …The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.	Chapter 4 Housing: as above	As above
Chapter 4 Housing	HS6 (2)	MM16	HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.	HS6: Student accommodation. Potential effect on changes in water quality or quantity. Policy supports the development of student accommodation, which would make a small scale contribution to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	'Smaller contributions' to water quantity and quality identified in paragraph 4.41 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 5 Offices	S4 (1)	MM17	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 NIA (1,600,000 m2 GIA) net during the period 2021 to 2040, phased as follows: • 2021 – 2026 500,000m2 NIA (666,666m2 GIA) • 2026 – 2031 400,000m2 NIA (533,333m2 GIA) • 2031 – 2036 200,000m2 NIA (266,666m2 GIA) • 2036 – 2040 100,000m2 NIA (133,333m2 GIA)	S4: Employment development. Potential effects on air pollution and changes in water quality or quantity. Policy seeks to protect existing offices and provide additional offices in the City. The scale of office development provided for is significant (minimum of 1.2 million m2 during 2021- 2040), and would contribute to effects relating to air pollution and changes in water quantity / quality. Development in the City must be car free, but employment development could attract trips from elsewhere	'Main contributions' to air pollution and water quantity and quality identified in paragraphs 3.38 and 4.40 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 5 Offices	5.1.1	MM18	The minimum requirement of ~~overall office floorspace target of~~ 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040…	S4: as above.	As above.
Chapter 5 Offices	5.3.9	MM19	5.3.9…Where a change ~~in~~ of use is proposed from office floorspace to another use,… ….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. Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. ….	OF2: Policy sets out circumstances in which loss of office accommodation would be inappropriate and routes any loss of in office space should follow and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 7 Culture and Visitors	7.1.5	MM20	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. When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.	S6: Policy defines the mix of uses appropriate to the City of London to attract visitors but the development itself (e.g. hotels) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.

<table>
<tr><th>Chapter</th><th>Paragraph</th><th>MM number</th><th>Amended text</th><th>HRA Assessment conclusion (2024)</th><th>Impact</th></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>New paragraph after 7.3.3</td><td>MM21</td><td>New paragraph 7.3.4

<u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u>

<table><tr><td></td><td><u>On Site</u></td><td><u>Off Site</u></td></tr><tr><td><u>> 10,000sqm gross floorspace</u></td><td><u>Yes. Provision will be commensurate with the scale of development</u></td><td><u>Not acceptable</u></td></tr><tr><td><u>< 10,000sqm gross floorspace</u></td><td><u>Preferred. Provision will be commensurate with the scale of development</u></td><td><u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u></td></tr></table></td><td><u>CV2:</u> Policy requires major developments to incorporate arts and culture provisions but will not itself result in new development.

No likely potential effects or need for scoping into the AA.</td><td>None.</td></tr>
<tr><td>Chapter 7 Culture and Visitors</td><td>CV4 (2)</td><td>MM22</td><td>CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts</td><td>CV4: Hotels and visitor infrastructure development. Potential effects on air pollution and changes in water quality or quantity.

Policy sets out circumstances in which hotel development would be permitted. This would contribute to air pollution and water quality and quantity effects. Development in the City must be car free, but hotels could attract trips from elsewhere.</td><td>‘Main contributions’ to air pollution identified in paragraph 4.38 of the Screening Assessment.

Mitigation identified in Screening Assessment: This policy states that hotels must be in suitable locations with good access to public transport, which will help to reduce trips and therefore air pollution associated with this policy.

To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</td></tr>
</table>

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 8 Infrastructure	IN2	MM23	1. Development must not lead to capacity or reliability issues in the surrounding area and should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers ~~capacity projections must take into account the impacts of climate change which will influence future infrastructure demand~~. 2. Developers are required to ~~demonstrate, through effective engagement with~~ provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development. 3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, ~~which may require the provision of~~ and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades. *Policy clauses 2 and 3 renumbered.*	IN2: policy sets out how development should provide infrastructure and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 9 Design	9.1.0	MM24	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, retrofitted and refurbished buildings.	S8: Policy sets out design requirements for development, including addressing climate change, sustainable design, limiting light pollution and providing green infrastructure but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 9 Design	9.1.3	MM25	9.1.3 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 life-cycle carbon of different development approaches.	S8: as above.	As above
Chapter 9 Design	9.1.4	MM26	9.1.4 Options appraisals should also be informed by the potential for wider environmental sustainability benefits for the site, its context and the whole City before considering ~~the many~~ ~~wider~~ other 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.	S8: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.1.5	MM27	9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.	DE1: Policy sets out requirements for development regarding sustainable design, including energy efficiency, circular economy, limiting pollution and water use but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 9 Design	DE1 (1)	MM28	DE1 (1) Development proposals should ~~follow~~ adopt a retrofit first approach~~, thoroughly exploring the potential for retaining and retrofitting.~~ At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.	DE1: as above.	As above
Chapter 9 Design	DE1 (3)	MM29	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment at planning stage and post construction.	DE1: as above.	As above
Chapter 9 Design	DE1 (7)	MM30	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. Retention, refurbishment, retrofit and reuse ~~Reuse, refurbishment and retention~~ of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	DE1: as above.	As above
Chapter 9 Design	DE1 (8)	MM31	DE1 (8) Proposals for major development will be required to: a. 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.~~ The adaption to climate change credit Wst 05 must be achieved in the waste category; ~~b. Commit to achieving a minimum NABERS UK rating of 5 stars;~~ Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); c. Demonstrate that London Plan guidance on operational carbon emissions and air quality requirements have been met on site.	DE1: as above.	As above
Chapter 9 Design	9.2.0	MM32	9.2.0 Materials – ~~retaining~~ reducing embodied carbon emissions from new build construction through retrofit and ~~in existing buildings and materials, and improving~~ resource efficiency.	DE1: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.2.9	MM33	9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) 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. - A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period. - 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~~ be at least Air Quality Neutral, in line with the City of London Air Quality SPD. - Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole. ~~which has been incorporated to address environmental challenges.~~ - 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. - Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options…	DE1: as above.	As above
Chapter 9 Design	9.2.9	MM34	9.2.9 ~~**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. • For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.	DE1: as above.	As above.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	DE4 (3)	MM35	3. Requiring all tall buildings ~~or major developments~~ to provide free to enter….	DE4: Policy sets out design requirements for roof terraces and elevated public spaces, including requirements for tall buildings, major developments, retail and leisure facilities to create attractive places and provided accessible elevated spaces. The policy will itself not result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 10 Transport	VT3 (4)	MM36	4. All off-street non-residential bays for car parking facilities must be equipped with active electric vehicle charging points usable from the outset.	VT3: Policy seeks to restrict car parking, provide charging facilities for electric vehicles and provide for taxi ranks at key locations but itself will not result in development. No likely potential effects or need for scoping into the AA.	None. Mitigation identified in Screening Assessment: This policy states that "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." In addition, no new public car parks will be permitted and underutilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points. These will contribute to mitigation for air pollution impacts.
Chapter 10 Transport	AT1 (c)	MM37	AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.	AT1: Policy sets requirements for developers to facilitate pedestrian movement and enhance permeability. No likely potential effects or need for scoping into the AA.	None. Mitigation identified in Screening Assessment: Policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution
Chapter 10 Transport	AT3 (2)	MM38	AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	AT3: Policy makes provision for cycling infrastructure. No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 10 Transport	10.10.1	MM39	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.	AT3: as above.	As above.
Chapter 10 Transport	10.10.2	MM40	10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises. *Existing wording in 10.10.2 to move to 10.10.3, etc.*	AT3: as above.	As above
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	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~~ sought where appropriate;	HE1: Policy requires developments that affect heritage assets or their settings to be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. The policy also sets out criteria when development may impact a heritage asset but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area. 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.	HE1: as above.	As above.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	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 historic environment, townscape and skyscape, including their cumulative effects.	HE1: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	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 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 s thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance. Applicants should draw reference to the Character Areas Study and the Setting Study (where appropriate) to understand their site's significance and the key attributes of significance they should consider	HE1: as above.	As above
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	11.3.8 On sites where significant archaeological artefacts or features 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.	HE2: Policy seeks to conserve and enhance the City's archaeology and ancient monuments and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application that shows how the OUV of the Tower of London has been interpreted.	HE3: Policy seeks to conserve and enhance the Tower of London World Heritage Site and its setting and development proposals in the vicinity of the Tower of London World Heritage Site are encouraged to enhance pedestrian and cycle routes. However, this policy itself will not result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.	HE3: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	2. The tall building areas identified on the Policies Map and Figure 14 (City Cluster, Fleet Valley and Broadgate site) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	S12: Policy provides design requirements for the developments of tall buildings in respect of the City's character and heritage, environment impact and with regard to assisting in the dispersal of air pollutants. The policy will not itself result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	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 respects both heritage significance and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	8c. the significance of heritage assets and their ~~immediate and wider~~ settings.	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	For the purposes of Policy D9 of the London Plan, the ~~The~~ tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building Site 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 new 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, new tall buildings, particularly on sites where there is no tall building currently, would be likely to have 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.	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	11.5.6 The heights of the buildings in the City Cluster, ~~and~~ Fleet Valley and Broadgate Tall Building site 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~~ These 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.~~	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	*Change to show new Broadgate Tall Building Site as an area suitable for tall buildings*	S12: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	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 historic environment, townscape and skyscape, including their cumulative effects.	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	*New paragraph after 11.5.12 (and renumber after)* On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.	S12: as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	*Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours*	S12: as above.	As above
Chapter 11 – Heritage and Tall Buildings	S13	MM57	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 and the settings of historic City landmarks and skyline features;	S13: Policy seeks to conserve protected views and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	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 and appropriate, including through the design of public realm and sustainable drainage systems. This can ~~Can~~ take many forms and require careful design, installation and regular maintenance.	OS2: Policy sets requirements for urban greening to be delivered as part of new development, including the installation of biodiverse extensive or intensive features. No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 13 Climate Resilience	S15	MM59	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 address the impacts of the urban heat island effect; ~~2.~~ 3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding; ~~3.~~ 4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and ~~4.~~ 5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.	S15: Policy sets out design requirements for development to adapt and be resilient to climate change and flood risk. No likely potential effects or need for scoping into the AA.	None.
Chapter 13 Climate Resilience	13.1.2-3	MM60	13.1.4 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. 13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.	S15: as above.	As above
Chapter 13 Climate Resilience	CR1	MM61	2. ~~Building designs should minimise any contribution to the urban heat island effect.~~ Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.	CR1: Policy sets out design requirements for development to prevent overheating and urban heat island effects, including through the design of the building. No likely potential effects or need for scoping into the AA.	None.
Chapter 13 Climate Resilience	13.2.2	MM62	~~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.~~ 13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.	CR1: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	6. Ensuring development proposals have regard to the ~~immediate~~ setting of Bevis Marks Synagogue (~~as set out in the Policy Map~~).	S21: Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	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;	S23: Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	~~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;~~	S24: Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.	S25: Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.	S25: as above.	As above
Chapter 15 Implementation	Policy S26	MM68	(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations. *Renumber parts 2 and 3.*	S26: Policy states that the City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development. As such, it will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.

Stage 2: Review of Mitigation Measures within the Appropriate Assessment

The above stage 1 process has identified some main modifications to policies which have some 'main' or 'smaller' contributions to air quality or water quantity or quality and were 'screened' into the 2024 AA. These policies are shown below against the detail of the change in the Main Modification and whether these changes had any implications of the quantity of development to take place in relation impacts on air pollution or water quality and quality. This identified that the changes do not impact upon quantum. The mitigation measures previously identified in the AA are considered to remain appropriate, subject to no further changes in the approach to these within the MMs or AMs to the City Plan.

Policy	Air Quality	Water quantity or quality	Detail of change	Conclusion
S3: Housing		Main	Changes relate to the reporting of housing delivery and do not result in an increase in expected development. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain. Stage 3: Review of the mitigation policies.
HS6: Student accommodation		Smaller	Changes relate to securing a nominations agreement with a higher education institution. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain. Stage 3: Review of the mitigation policies.
S4: Offices	Main	Main	Changes relate to the measurement of office development and expectations for changes of use. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies.
CV4: Hotels	Main	Main	Change relates to acceptability of adverse impacts on residential amenity. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies
HL7: Sport and recreation	Smaller		Removal of reference to protection of 'public' sport and recreation facilities only. This change will not in itself lead to new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures identified for air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies

Stage 3: Review of the Mitigation policies identified in Appropriate Assessment against the Main and Additional Modifications

This stage involved review of the mitigation measures identified in the AA against the MMs and Ams to the City Plan. It identified that there were no changes to parts of the policy which include mitigation measures designed to address the impacts on air quality or water quantity and quality.

It therefore concludes that the conclusions of the Appropriate Assessment 2024 remain in light of the Main and Additional Modification to the City Plan.

Policy with mitigation	Air pollution mitigation	Water quality mitigation	Commentary in Appropriate Assessment of mitigation measures	MM or AM change
Policy HL5: Contaminated land and water quality		Yes	Paragraph 5.6: policy states "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."	No change to policy.
Policy CV4: Hotels	Yes		Paragraph 5.4 states policy requires that hotels must be in suitable locations with good access to public transport.	No change to this wording. Changes relate to unacceptable impacts only.
Policy VT2: Freight and Servicing	Yes		Paragraph 5.4 states policy requires that servicing areas are equipped with electric vehicle fast charging points. It also states that "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."	No change to policy.
Policy VT3: Vehicle Parking	Yes		Paragraph 5.4: States that "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." In addition, no new public car parks will be permitted and under-utilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points.	Change to this policy relates to the provision of electric charging points and does not change the approach to minimising car parking provision or prioritisation of existing car parking for other uses. AM27 confirms that "In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation." This does not change the scope of the potential for air pollution as this is also covered by the London Plan policies E10 (H), T6.1 and T6.5.
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	Yes		Paragraph 5.4 states policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fueled vehicles and therefore air pollution	No change to this wording. Changes relate to opportunities to enable improved and new connections through to mainline railway stations.
Policy IN1: Infrastructure provision and connection		Yes	At paragraph 5.7: Policy provides measures that will reduce the requirement for water treatment and discharge associated with the Plan: "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." And "Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and	No change to policy.

			greywater recycling, minimising discharge to the combined sewer network."	
Policy CR3: Sustainable drainage systems (SuDS)		Yes	Paragraph 5.6: 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." And "SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces."	No change to policy.
Strategic Policy S17: Thames Policy Area		Yes	Paragraph 5.6: character of the riverside will be enhanced by "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."	No change to policy.
Strategic Policy S19: Pool of London	Yes		Paragraph 5.4: states policy requires that car parking areas are removed upon redevelopment, within this policy area	No change to policy.

Stage 4 Consultation responses

The previous conclusion of the AA highlighted how HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. As part of the Regulation 19 consultation the HRA was subject to consultation with Natural England, as well as the Environment Agency, to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making. Neither of these bodies raised any specific comments or concerns in relation to the conclusion of the HRA.

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City Plan 2040

Shaping the Future City







CITY OF LONDON

City of London Local Plan **Proposed Main and Additional Modifications**

This is a visual representation of the Main and Additional Modifications and it is for reference purposes only.

The proposed additions are recorded by underlined text and deletions are recorded through strikethrough.

The Main Modifications are changed in red text and the Additional Modifications are changed in blue text.

Foreword

The City of London is like nowhere else on Earth. A global economic powerhouse, and an ancient city. A centre of collaboration and innovation for the hundreds of thousands of people who work here every day. A destination for visitors and tourists who come to experience our unparalleled culture and heritage. A unique place to live – right in the heart of the capital. A place where the architecture of centuries past sits cheek-by-jowl with modern skyscrapers, creating a thrilling juxtaposition of form and function and a skyline that is recognisable the world over – telling the history of this great capital city in microcosm.

The great paradox of the City – of all truly successful cities – is that to remain successful it has needed to adapt, to change and to grow. The City of today has enormous strengths but, like all places, it faces challenges. The City Plan 2040 will help to shape the City's built environment in ways that rise to these challenges and make the most of our strengths.

We need to continue creating the workplaces and the infrastructure that will attract businesses to the Square Mile, which play such an important role in powering economic growth, innovation and investment, and providing unrivalled employment opportunities – not just for the City, but for London and for the nation as a whole.

It is people that bring the Square Mile to life, so we need to ensure the City's public spaces, our amenities and experiences create a place that City workers look forward to coming to. Everyone – whether they work here, live here, or are visiting the Square Mile – should feel safe, comfortable and welcome. To remain a beacon of success throughout the 21st century, the Square Mile needs to be a place that is inclusive of all communities, celebrating diversity and welcoming everyone whatever their background, and remain a healthy place for people to spend time.

We need to realise our vision for Destination City – attracting greater numbers and a more diverse range of visitors to the City, transforming the leisure and cultural offer of the Square Mile to create unique experiences that simply cannot be found elsewhere, and ensuring the Square Mile becomes a vibrant destination 7 days a week and into the evenings.

And we need to act quickly and with responsibility if we are to ensure the City continues to thrive in the face of our changing climate – addressing head on the carbon emitted by the built environment and creating a City that can adapt to extreme weather, flooding and other climate challenges. The City is serviced by unrivalled public transport, making it a sustainable place to accommodate growth; but given the dense nature of the Square Mile we need to ensure our streets and public realm are focussed on delivering space for people walking, cycling, wheeling and spending time. The City will become greener and more biodiverse, bringing more of the many benefits of nature into the Square Mile.

The City's neighbourhoods are bursting with unique character. We need to ensure – as the City grows and changes – that the heritage of our neighbourhoods is celebrated and that new development brings new opportunities for everyone to enjoy the City. Our Key Areas of Change will see transformational improvements, revealing and celebrating the best of their character while realising their potential as places.

The City of tomorrow will be shaped by many people, groups and organisations – as has this City Plan. It sets out our vision for a Square Mile that is economically, socially, and environmentally sustainable; a City that becomes ever more vibrant and competitive; a place that welcomes everyone; a place that – as it changes – continues to be utterly, thrillingly unique.

Tom Sleigh
Chairman of the Planning & Transportation Committee



TO BE UPDATED

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AM1

1 Vision and Strategic Priorities



AM1

1 Vision and Strategic Priorities

MM1

By 2040 the City of London will have become:

1. **A stronger, more vibrant and competitive economy**. The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business.

2. **A 7-day-a-week destination.** The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn.

3. **A more sustainable city**- The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors.

4. **A more inclusive and healthier city-** the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all.

5. **A place where heritage and positive change are celebrated**- the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.



AM1

1 Vision and 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~~.~~ The strategic priorities form the Vision for the City over the plan period to 2040 and set a framework for the Strategic Policies and other policies under each chapter. ~~t~~Together ~~with policies that~~ they will guide decisions on planning applications.

AM1

AM2 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.

AM3 1.1.2 As set out in paragraph 8 of 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.

Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies

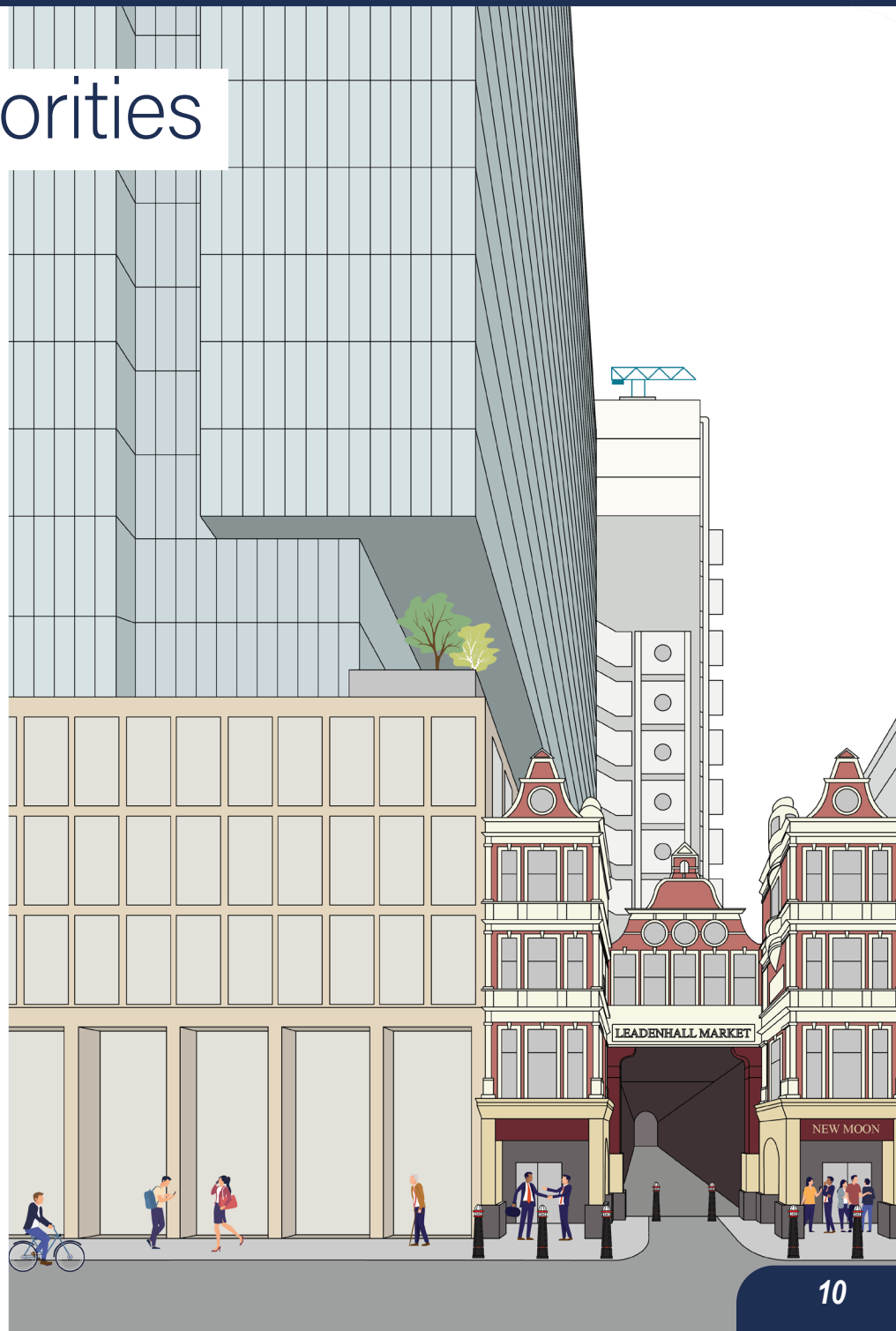
AM1

1 Vision and Strategic Priorities

1.2 Economic objective

AM4

- Delivering sustainable economic growth, including a minimum of 1.2 million sqm NIA (1.6 million GIA) 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



AM1

1 Vision and Strategic Priorities

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



AM1

1 Vision and Strategic Priorities

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



Page 113

2 Spatial Strategy

AM5

2.1 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.

2.2 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 KAOC are set out in Section 14.

2.3 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.

2.4 Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.

2.5 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.

2.6 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.

2.7 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.

2.8 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.

2.9 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.

2 Spatial Strategy

2.10 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.

2.11 Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, ~~and~~ the Fleet Valley, and the Broadgate tall building site, which are identified as areas suitable for tall buildings.

MM3

2.12 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.









2 Spatial Strategy

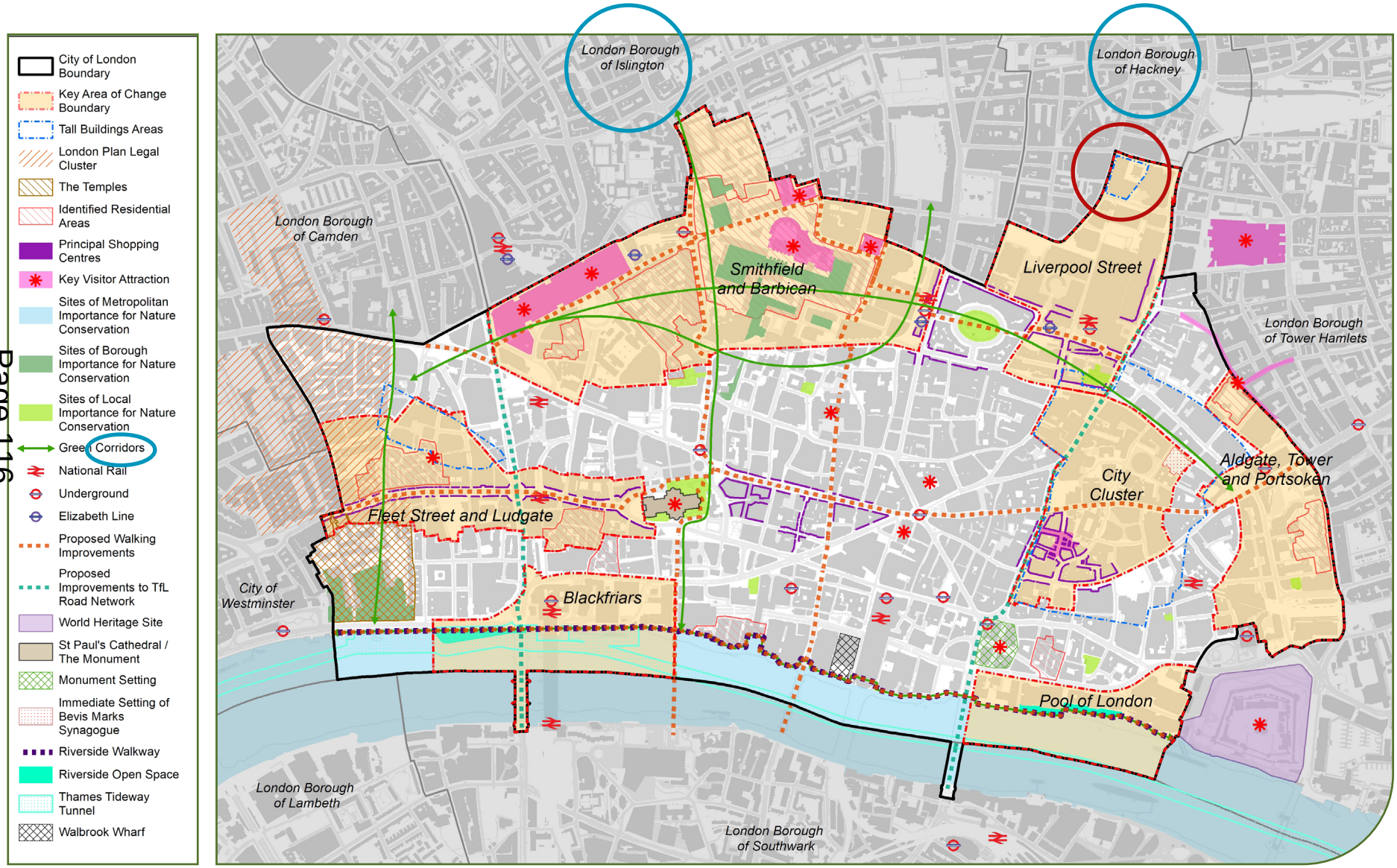


Figure 1: Key Diagram

MM2 *Change to include new Broadgate Tall Building Site on Key Diagram*

AM6 *Green Corridors ~~Links~~ Add reference to LB Hackney and Islington.*

3 Health, Inclusion & Safety



3 Health, Inclusion & Safety

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:
    a. engage with neighbours before and during construction to minimise adverse impacts;
    b. promote healthy buildings and the use of relevant standards that measure health and wellbeing in buildings;
    c. improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
    d. respect the City's quieter places and spaces;
    e. limit unnecessary light spillage and 'sky glow';
    f. 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;

3 Health, Inclusion & Safety

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.

3 Health, Inclusion & Safety

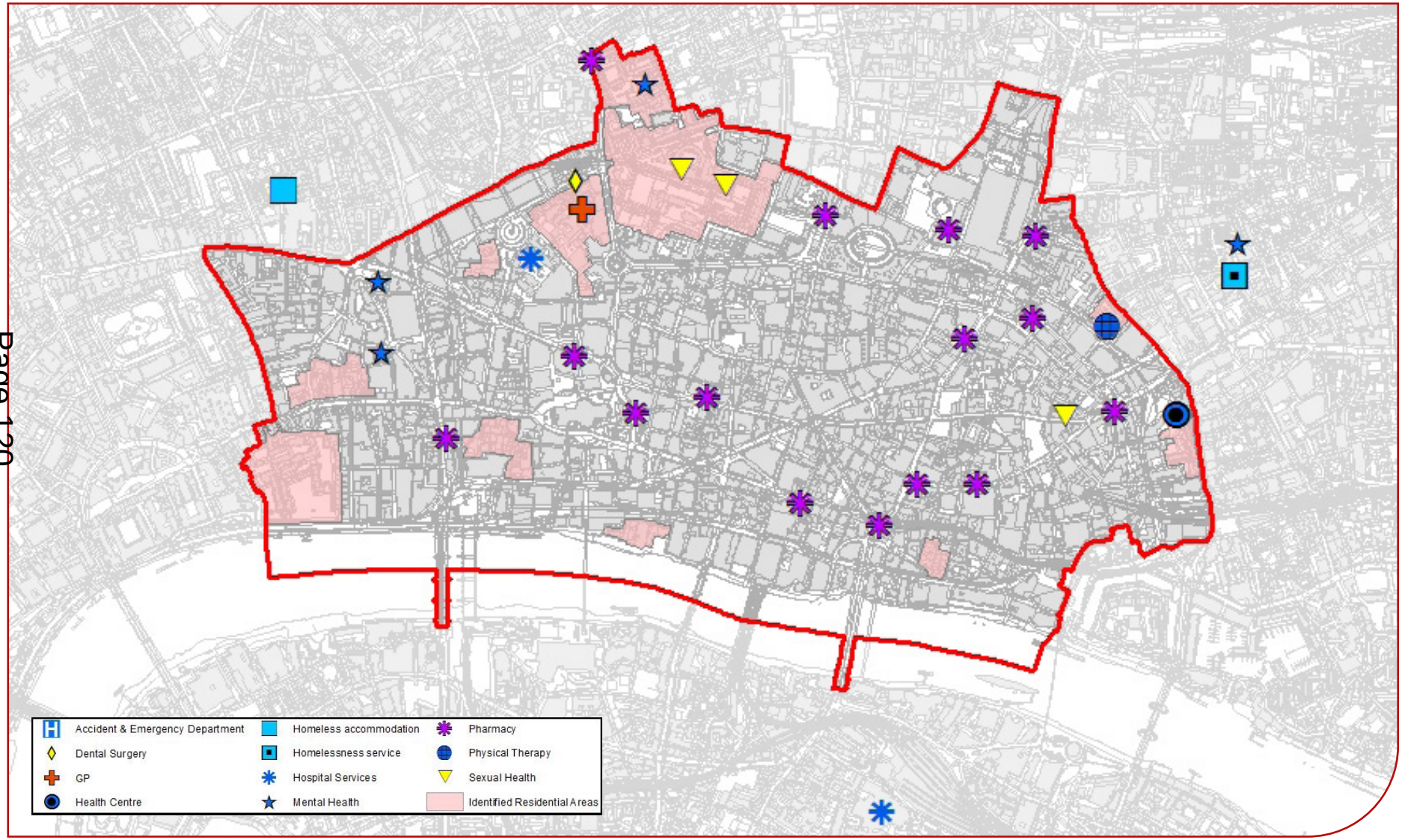


Figure 2: Health facilities in and adjoining the City

3 Health, Inclusion & Safety

AM11 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~~ North East London 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.

AM12 3.1.5 The City's many churches other faith communities and their buildings, including Bevis Marks Synagogue, make a highly significant contribution to the life of the City and its built environment. The churches and places of worship play an important social, faith, community and civic role, throughout the week. The church buildings and synagogue are a significant part of the architectural and historic character of the Square Mile, are visitor destinations that provide cultural experiences, as well as providing many of the City's open spaces.

3.1.6 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.

AM13 3.1.7 Outdoor spaces and the public, including churchyards realm provide places for relaxation, amenity, well-being 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.

3.1.8 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 Health, Inclusion & Safety

Policy HL1: Inclusive buildings and spaces

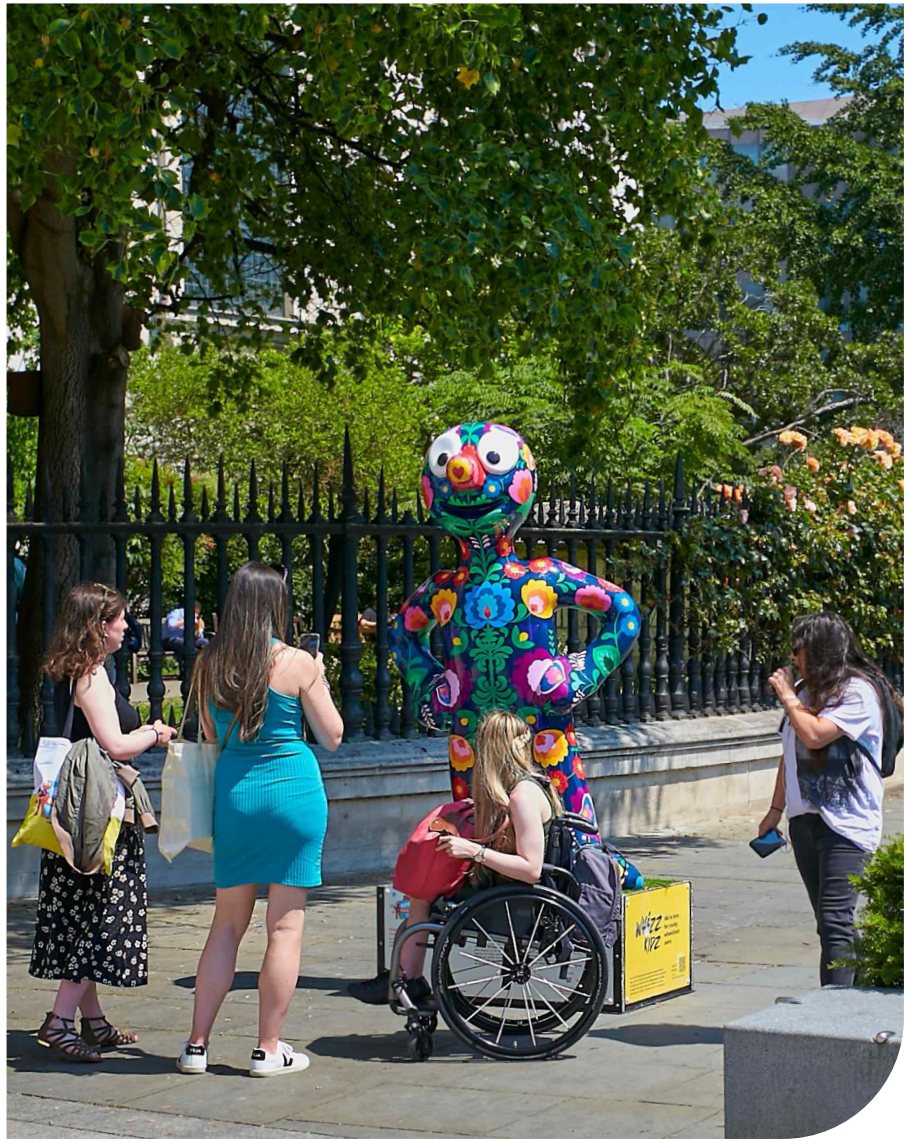
1. Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

2. 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;

3. Convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;

4. 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;

5. 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.



3 Health, Inclusion & Safety

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 Health, Inclusion & Safety

Policy HL2: Air quality

MM4

1. Developers will be required to effectively manage ~~the~~ their proposal's impact ~~of their proposals~~ on air quality. Major developments must comply with the requirements of the Air Quality SPD ~~for~~ which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs);
2. Development that would result in a worsening of the City's nitrogen dioxide or PM10 and PM2.5 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 (NOx);
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 posible. 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

AM7

3.3.0 Due to its location at the heart of London and the density of development, the City of London has historically experienced 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~~;~~ and has been implementing actions to improve air quality through its Air Quality Strategies, due to national health-based objectives for the pollutants nitrogen dioxide (NO_2) and small particles (PM_{10}) not being met. National targets for $PM_{2.5}$ are also not met.

3 Health, Inclusion & Safety

3.3.1 The City Corporation is working with a wide range of organisations to address this problem and levels of NO_2 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 an annual average of 30µg/m3 NO2 by 2030. ~~the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO_2 by the beginning of 2025. Limits set for particulate matter (PM_{10}) are generally met although the national target for $PM_{2.5}$ 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_{10} and $PM_{2.5}$ by 2030~~. The City Corporation works with a wide range of organisations to improve air quality. Although air quality has been improving, it remains at a level that still impacts on health. The City Corporation's 2025 to 2030 Air Quality Strategy sets a pathway to achieving the 2021 World Health Organisation Air Quality Guidelines for nitrogen dioxide(NO_2), and particulate matter PM_{10} and $PM_{2.5}$.

AM8

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 NOx 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.

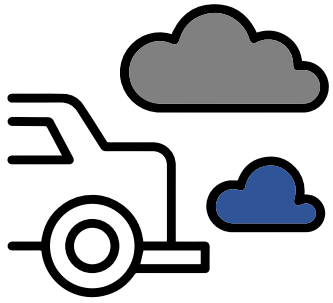
How the policy works

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.

AM9



~~**90% of the Square Mile to meet WHO air quality guidelines for NO_2 by 2025**~~

90% of the Square Mile to meet an annual average of 30µg/m^3 for NO_2 by 2030.

3 Health, Inclusion & Safety

Policy HL3: Noise

AM10

1. A noise assessment will be required where noise sensitive uses may be impacted ~~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, places of worship and quiet open spaces, including churchyards. 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.



3 Health, Inclusion & Safety

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, places of worship, and certain open spaces, including churchyards.

AM14

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 Health, Inclusion & Safety

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.

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 Health, Inclusion & Safety

Policy HL5: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:

   a. 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

   b. 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

   c. 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:

   a. In locations which are convenient to the communities they serve;

   b. In or near identified residential areas, providing their amenity is safeguarded; and

   c. 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.

3 Health, Inclusion & Safety

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 Health, Inclusion & Safety

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 Health, Inclusion & Safety

Policy HL6: Public toilets

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

AM15

1. Requiring the provision of a range of directly accessible public toilet facilities suitable for ~~a range of users~~ all within the community 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.

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 provision of new publicly accessible toilets should also meet the relevant London Plan (Policy S6) and Building Regulations (Part T) requirements. The scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

AM16

3 Health, Inclusion & Safety

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 Health, Inclusion & Safety

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.

MM5

2. Existing ~~public~~ sport and recreational facilities will be protected in situ, unless:

   a. 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

   b. necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or

   c. 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.



3 Health, Inclusion & Safety

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

MM6 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. However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning. 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 Health, Inclusion & Safety

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:

   a. 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;

   b. 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;

   c. Requiring external play space and facilities as part of major new residential developments;

   d. 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;

   e. Promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas; and

   f. 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.



3 Health, Inclusion & Safety

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 Health, Inclusion & Safety

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.~~ The impact on sensitive uses such as education, health, leisure or community facilities, places of worship publicly accessible open space, including churchyards, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent should be taken into consideration.

AM17

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.

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 phrase, 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. For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.

MM7

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.

3 Health, Inclusion & Safety

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.

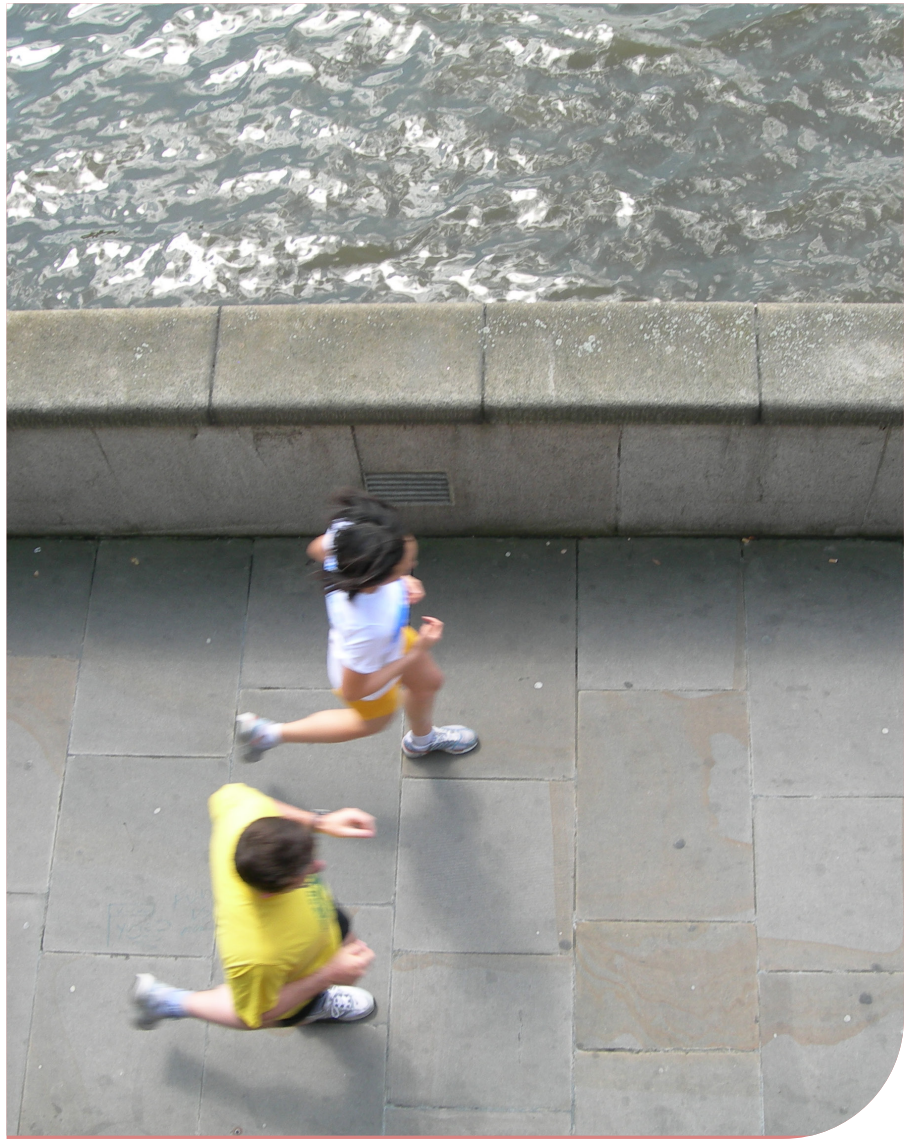
Rapid HIA

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 Health, Inclusion & Safety

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.



3 Health, Inclusion & Safety

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 Health, Inclusion & Safety

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.

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 Health, Inclusion & Safety

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, places of worship and churchyards. AM18



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.

3 Health, Inclusion & Safety

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 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.

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 Health, Inclusion & Safety

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.

3 Health, Inclusion & Safety

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.



3 Health, Inclusion & Safety

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 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 Temple~~s~~, 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.

AM19



4 Housing

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

4 Housing

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. Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.

MM12

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 for the first 4 years and 102 dwellings in the fifth year) 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:

MM13

- 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.~~

MM14



The Office for National Statistics project that the City's permanent residential population will rise to approximately **9,500** by **2040**.

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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.

MM9

MM10 4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.

Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.

Table 1- Housing Delivery (Source City Corporation Monitoring data)

Year	Numbers (after any conversion)	Status
2019/20	296	Completions
2020/21	202	Completions
2021/22	433	Completions
2022/23	96	Completions
2023/24	0	Completions
2024/25	29	Completions
2025/26	41	Completions (projected)
2026/27	97	Completions (projected)
2027/28	580	Completions (projected)
2028/29	342	Completions (projected)
	2116	

4 Housing

4.1.14 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 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

4.1.15 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

4.1.16 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.

MM15 4.1.17 The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.

4 Housing

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:

    a. Encouraging new housing development on appropriate sites in or near identified residential areas;

    b. 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;

    c. Protecting existing housing where it is of a suitable quality and in a suitable location;

    d. Exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and

    e. Refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2.

MM8 2. Ensuring sufficient affordable housing is provided. Incentivising affordable housing delivery to meet the City's housing need and contributing to London's wider housing needs by:

    a. ensuring the delivery of applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land;

    b. 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

    c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and where appropriate 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'.

4 Housing

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

4 Housing



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 Housing

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 1,000m². 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, except where, in accordance with London Plan policy H4, there is a portfolio agreement with the Mayor of London. 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.

AM20

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 Housing

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. Both the ~~The~~ City's SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the Square Mile, it is considered ~~and~~ that social rented units ~~would~~ will often 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, considering~~ ~~having regard to~~ evidence of need (as set out in the SHMA and its Supplement) 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.

AM21

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 Housing

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:

   a. 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;

   b. Inhibit the development potential or business activity in neighbouring commercial buildings and sites; or

   c. 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.



4 Housing

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.

4 Housing

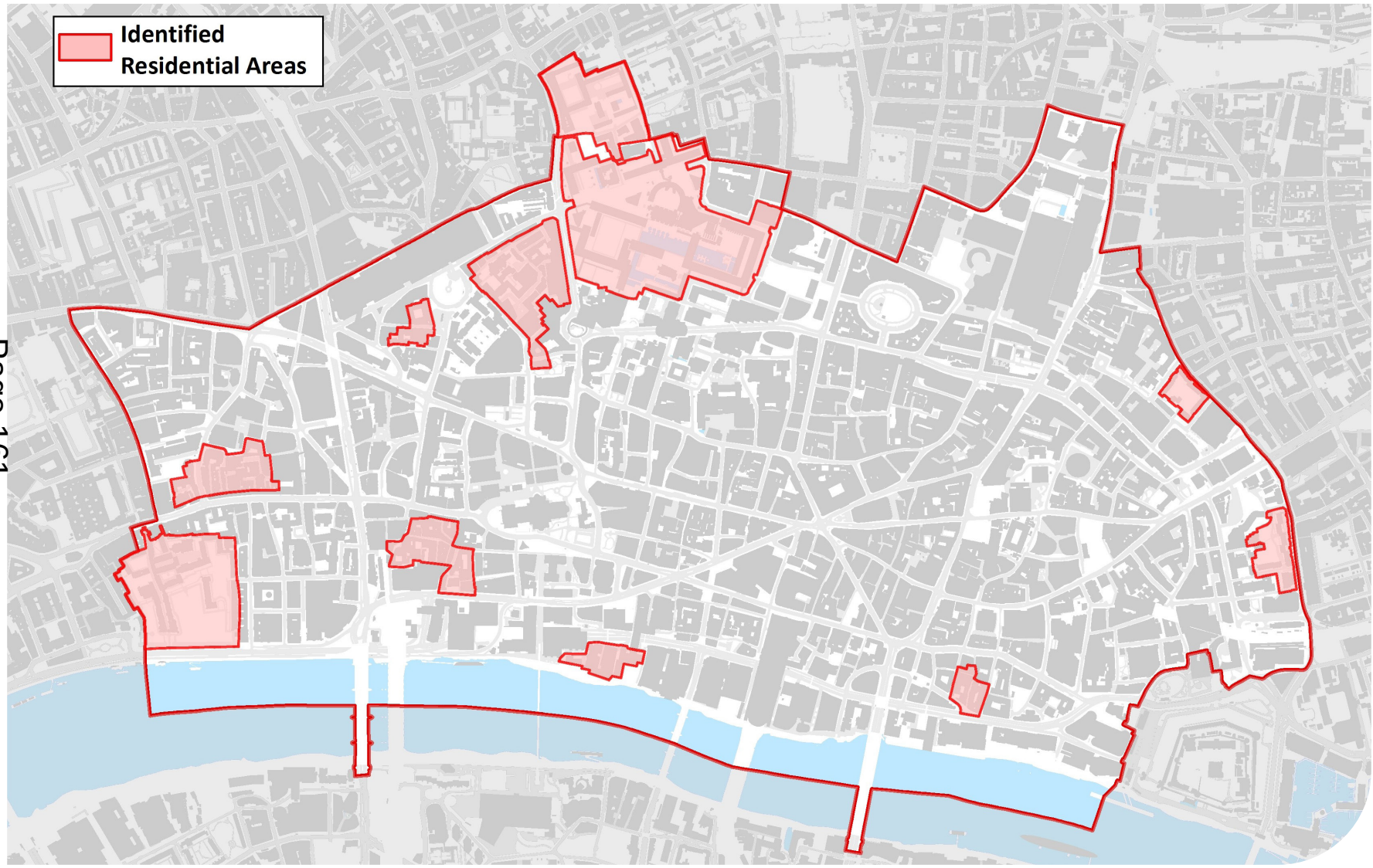


Figure 3: Residential areas

4 Housing

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.



Reason for the policy

AM22 4.4.0 The net loss of existing housing units, including to other residential products such as student or co-living 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 Housing

Policy HS3: Residential environment

AM23 The amenity of existing residents will be protected by

AM24
1. Resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements.
2. 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.;
3. All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE8.;
4. The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.

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 Housing

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;

AM25

2. Meets standards for Secured by Design or similar certification; and

3. Maximises opportunities for providing communal open and leisure space for residents;.

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 Housing

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.



4 Housing

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 Housing

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:

   a. They would meet high standards of design and amenity for occupants;

   b. There are appropriate amenities for occupants in the local area;

   c. They are well connected to relevant further or higher education institutions;

   d. 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;

   e. They would not have an adverse impact on the residential amenity of the area; and

   f. They would not involve the loss of permanent residential accommodation.

MM16 2. Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.

AM26 3. 35% of student ~~accommodation~~ rooms ~~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.

4 Housing

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. In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.

AM27

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 Housing

Policy HS7: Older persons housing

1. The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:
2. 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;
3. Supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
4. Ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and
5. Resisting development that involves the net loss of housing for older people.

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.

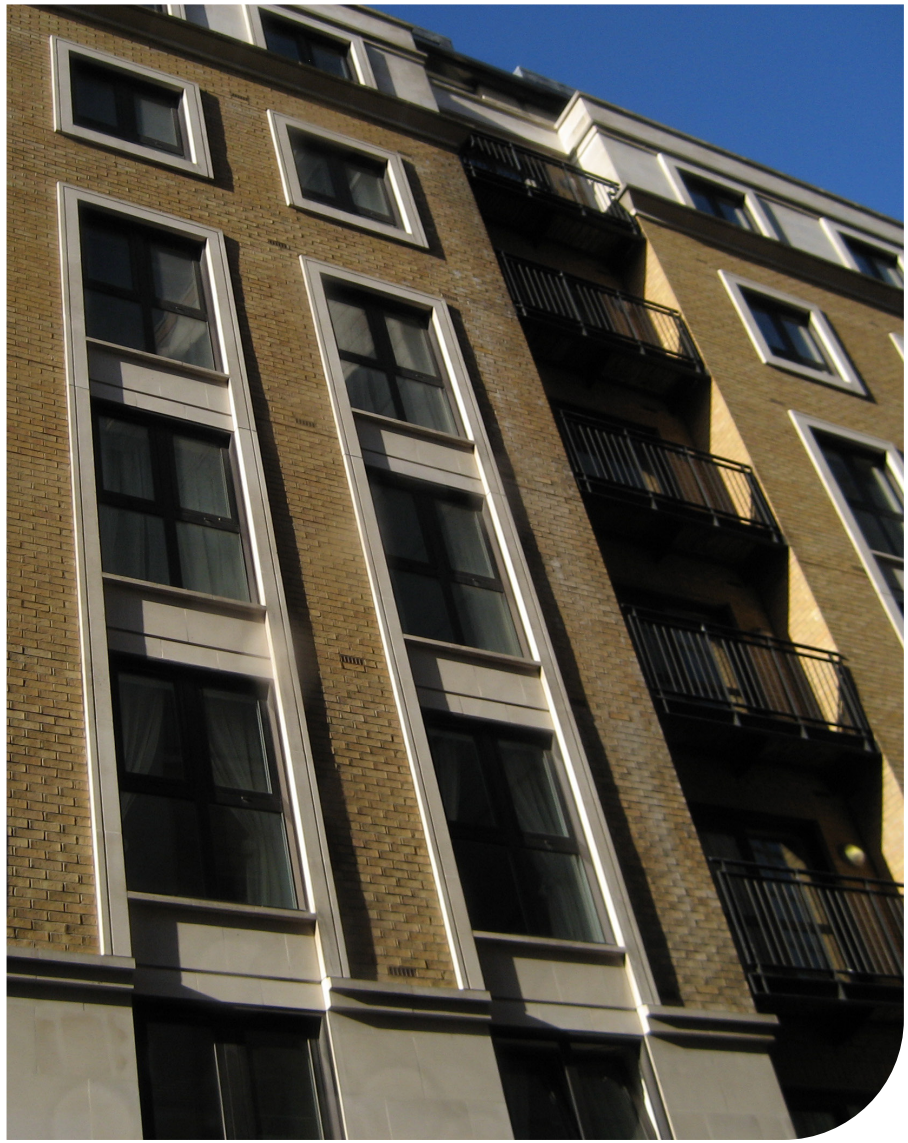
How the policy works

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 Housing

Policy HS8: Self and custom housebuilding

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



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.

5 Offices



5 Offices

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 m² NIA (1,600,000 m² GIA) net during the period 2021 to 2040, phased as follows: MM17

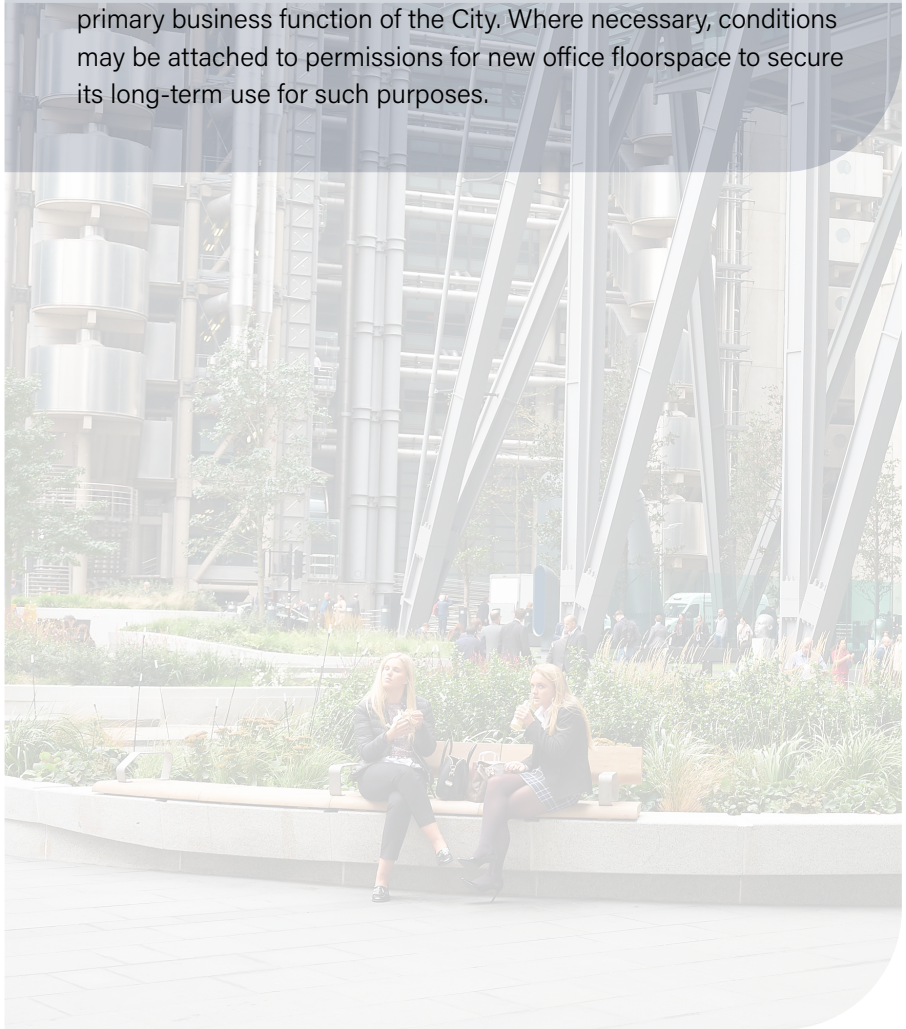
   - 2021 – 2026 500,000m² NIA (666,666m2 GIA)
   - 2026 – 2031 400,000m² NIA (533,333m2 GIA)
   - 2031 – 2036 200,000m² NIA (266,666m2 GIA)
   - 2036 – 2040 100,000m² NIA (133,333m2 GIA)

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.



5 Offices

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 minimum requirement of ~~overall office floorspace target of~~ 1,200,000m² net internal area (or 1,600,000m² GIA) 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.

MM18

AM28 5.1.2 The minimum requirement ~~demand target~~ is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central figure ~~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 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.

5 Offices

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.

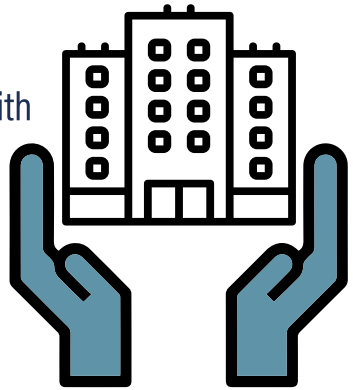
5.1.7 Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses in particular 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.

There were **22,300** businesses and **590,000** workers in the City in 2021

99%
of City businesses are SMEs with fewer than 250 employees

80%
have fewer than 10 employees



5 Offices

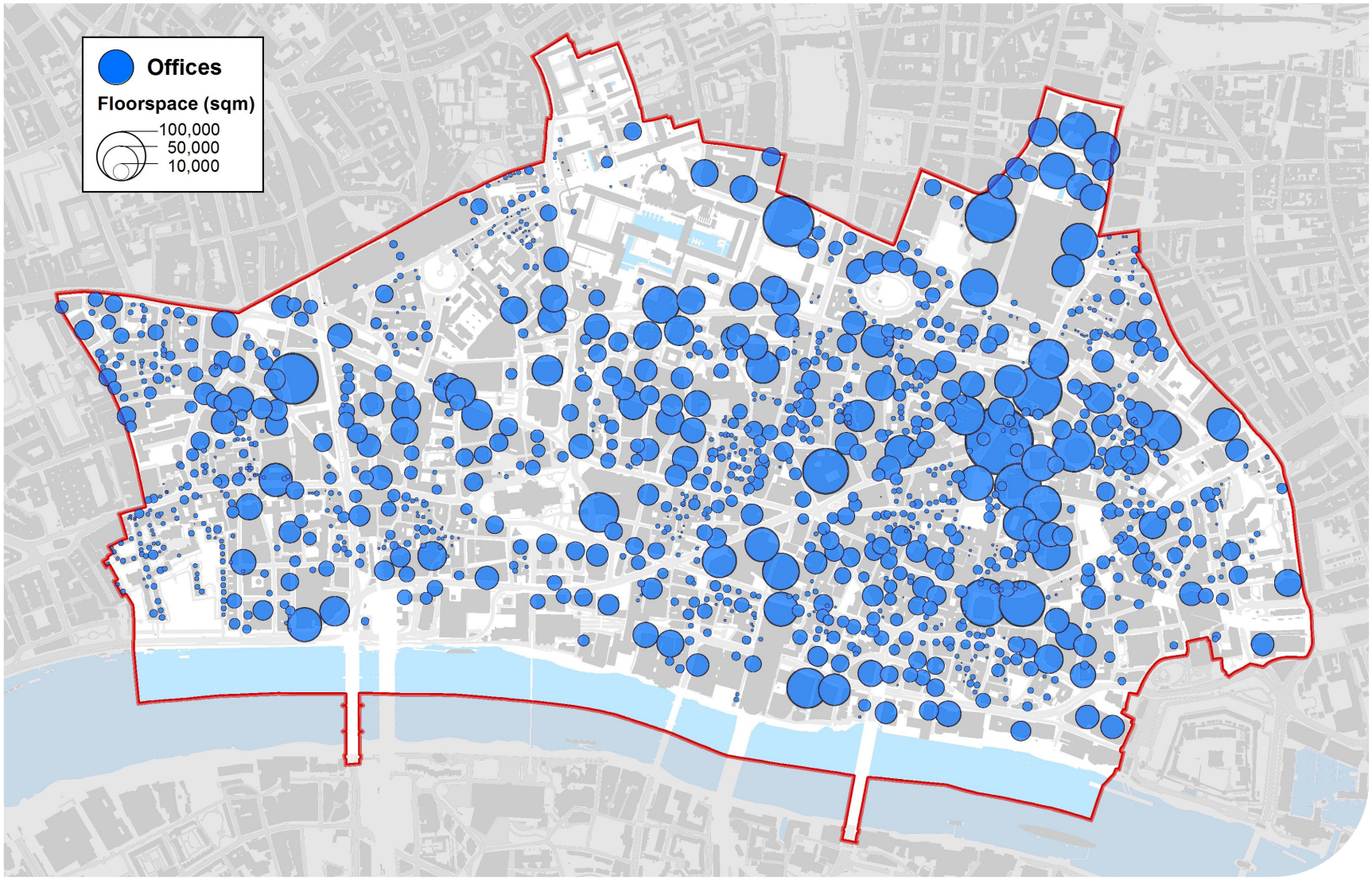


Figure 4: Office distribution

5 Offices

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 Offices

Policy OF1: Office Development

1. Office development should:
   a. Prioritise the retrofitting of existing buildings;
   b. Be of an outstanding design and an exemplar of sustainability;
   c. Be designed for future flexibility to future proof the City's office stock and realise the principles of circular economy design approaches;
   d. Provide office floorspace suitable for a range of occupiers;
   e. Provide healthy and inclusive working environments that promote wellbeing; and
   f. 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.



5 Offices

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 Offices

Policy OF2: Protection of Existing Office Floorspace

1. The loss of existing office floorspace will be resisted unless it can be demonstrated that:

    a. 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;

    b. The proposed development would not compromise the potential for office development on sites within the vicinity; and

    c. 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 reprovision 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.

5 Offices

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 Offices

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.



5 Offices

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.

MM19 5.3.9 Where a change ~~in~~ of 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. Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. 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 Offices

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.

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.

6 Retail



6 Retail

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^2 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^2 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 encouraging 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.

6 Retail

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^2 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

6 Retail

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^2 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.



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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:

    a. the contribution the unit makes to the function and character of the PSC;

    b. maintaining an active frontage; and

    c. 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.



6 Retail

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:

6 Retail



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. The PSC frontage has been extended to include established retail premises in the area.

6 Retail



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. The PSC frontage has been extended to include established retail premises in the area.

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. The PSC has been expanded to reflect these factors.

6 Retail

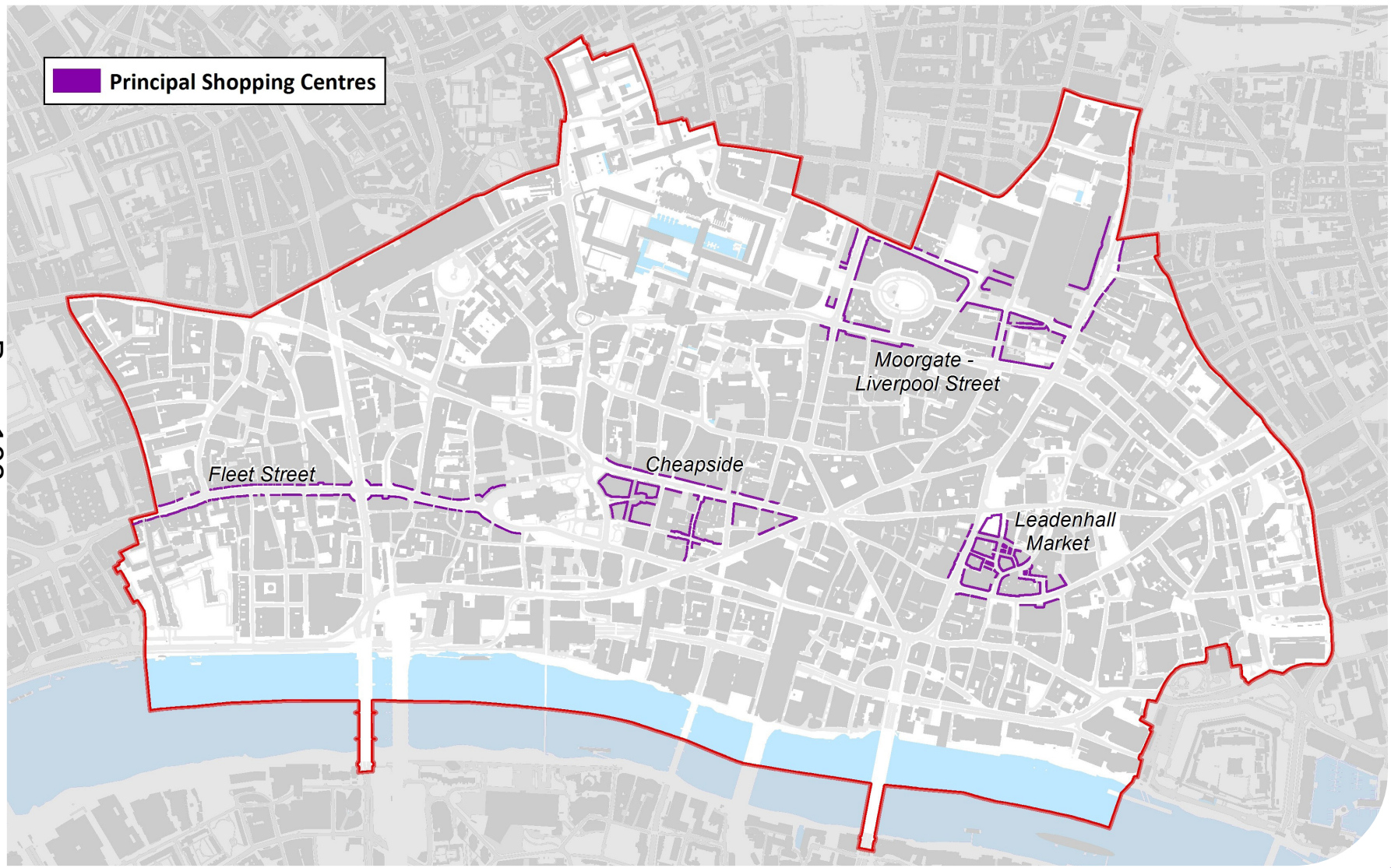


Figure 5: Principal Shopping Centres

6 Retail

Policy RE2: Active frontages

1. Active frontage uses will be encouraged at ground floor level across the City provided they:

   a. Do not impact adversely on the amenity of residents, workers and visitors;

   b. Do not impact adversely on the operation of office premises; and

   c. 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.

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3. New retail provision will be encouraged in active frontages and the ~~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.



6 Retail

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 Retail

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.

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 Retail

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.

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.

7 Culture & Visitors



7 Culture & Visitors

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Strategic Policy S6: Culture and Visitors

The City Corporation will maintain and enhance the City of London's cultural infrastructure, 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 infrastructure, and leisure, ~~and~~ recreation and visitor 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 infrastructure ~~significance~~ including cultural buildings and leisure, and recreation and visitor 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 infrastructure ~~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 City's cultural infrastructure or businesses ~~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 infrastructure, including ~~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 cultural infrastructure, including 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 the City's rich heritage and culture; and
11. Encouraging the temporary use of vacant buildings for creative and cultural activities.

7 Culture & Visitors

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 and to recognise this the plan takes forward a 'cultural ecosystem' approach deployed in the Cultural Planning Framework. ~~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.~~ Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed. This includes production in creative education, workspaces, studios, livery halls and places of worship; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, performance venues and places of worship. Churches and other places of worship, often open for free every day of the year, are deeply embedded in the fabric of the city and are key locations for the production and consumption of culture and provide a key role in educating and understanding the history of the City and its role in the nation. ~~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.~~

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Cultural contributors are complementary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas 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. The 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 Culture & Visitors

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 cultural infrastructure, and leisure, recreation and visitor ~~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.

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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. When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.

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7 Culture & Visitors

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Policy CV1: Protection of Existing Cultural Infrastructure, and Leisure, Recreation and Visitor, ~~Arts and Cultural~~ Facilities

1. The City Corporation will resist the loss of existing Cultural Infrastructure, and Leisure, Recreation and visitor, ~~arts, and cultural~~ facilities, unless:

   a. 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

   b. 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

   c. 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 Cultural Infrastructure, and Leisure, Recreation and 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 Cultural Infrastructure, and Leisure, Recreation and 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 Cultural Infrastructure, and Leisure, Recreation and visitor, ~~arts or cultural~~ use at reasonable terms for such a use.



7 Culture & Visitors

Reason for the policy

AM34 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. In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption. 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

AM35 7.2.2 Applicants will be required to demonstrate that ~~an~~ existing cultural infrastructure, and leisure, recreation and 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 Culture & Visitors

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Policy CV2: Provision of Cultural Infrastructure, ~~Arts, Culture and Leisure~~ Recreation and Visitor Facilities

The City Corporation will seek opportunities to provide new cultural infrastructure, leisure, recreation and visitor ~~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 cultural infrastructure, ~~arts, culture or~~ leisure, recreation and visitor facilities;

3. Requiring major developments below 10,000 sqm in size to make provision for cultural infrastructure, ~~arts, culture or~~ leisure, recreation or visitor facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards cultural infrastructure, ~~arts, culture and~~ leisure, recreation or visitor 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 cultural infrastructure, ~~arts, culture and~~ leisure, recreation or visitor 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.

Reason for the policy

AM37 7.3.0 The provision of cultural infrastructure, ~~new arts, culture and~~ leisure, recreation and visitor 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 the cultural infrastructure, ~~arts, culture or~~ leisure recreation or visitor offer, and how it would complement the character of the focal area identified in the CPF.

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7 Culture & Visitors

AM39 7.3.3 Cultural infrastructure, ~~Arts, culture and~~ leisure, recreation and visitor 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 the public realm.

MM4 7.3.4 Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.

	On Site	Off Site
> 10,000sqm gross floorspace	Yes. Provision will be commensurate with the scale of development	Not acceptable
< 10,000sqm gross floorspace	Preferred. Provision will be commensurate with the scale of development	Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled

AM40 7.3.5 Developers should consider the operational and management requirements of cultural infrastructure and leisure, recreation and visitor facilities provided in new developments prior to approval. ~~A robust management~~ An outline plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage, to be completed in detail at application stage.

7.3.6 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 Culture & Visitors

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Policy CV3: Provision of Visitor Facilities

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

1. Seating and tables;

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2. Structures and landscaping to enable children's play ~~and provide facilities for school groups~~;

3. Facilities for school groups;

4. Suitable shelter from weather conditions;

5. Well-designed public convenience provision, including changing places toilets, accessible to all users;

6. Well-designed signage, wayfinding and links to visitor facilities and destinations;

7. Temporary pop-up art installations, galleries and spaces in appropriate locations:

8. Performance spaces and animation of key routes where appropriate.

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.

AM43 7.4.1 Churches and other places of worship are a key component of the overall visitor experience and help create the distinctive look and feel of the City. They provide many of the facilities that visitors require such as: calm green spaces to stop and rest; shelter that is free to access; cafes and toilets; and activities for school groups. They also attract visitors with a diverse cultural, historical and religious offer.

How the policy works

7.4.2 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 Culture & Visitors

Policy CV4: Hotels

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

1. Comply with the requirements of Policy OF2;

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2. Do not result in unacceptable 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).



7 Culture & Visitors

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.

7 Culture & Visitors

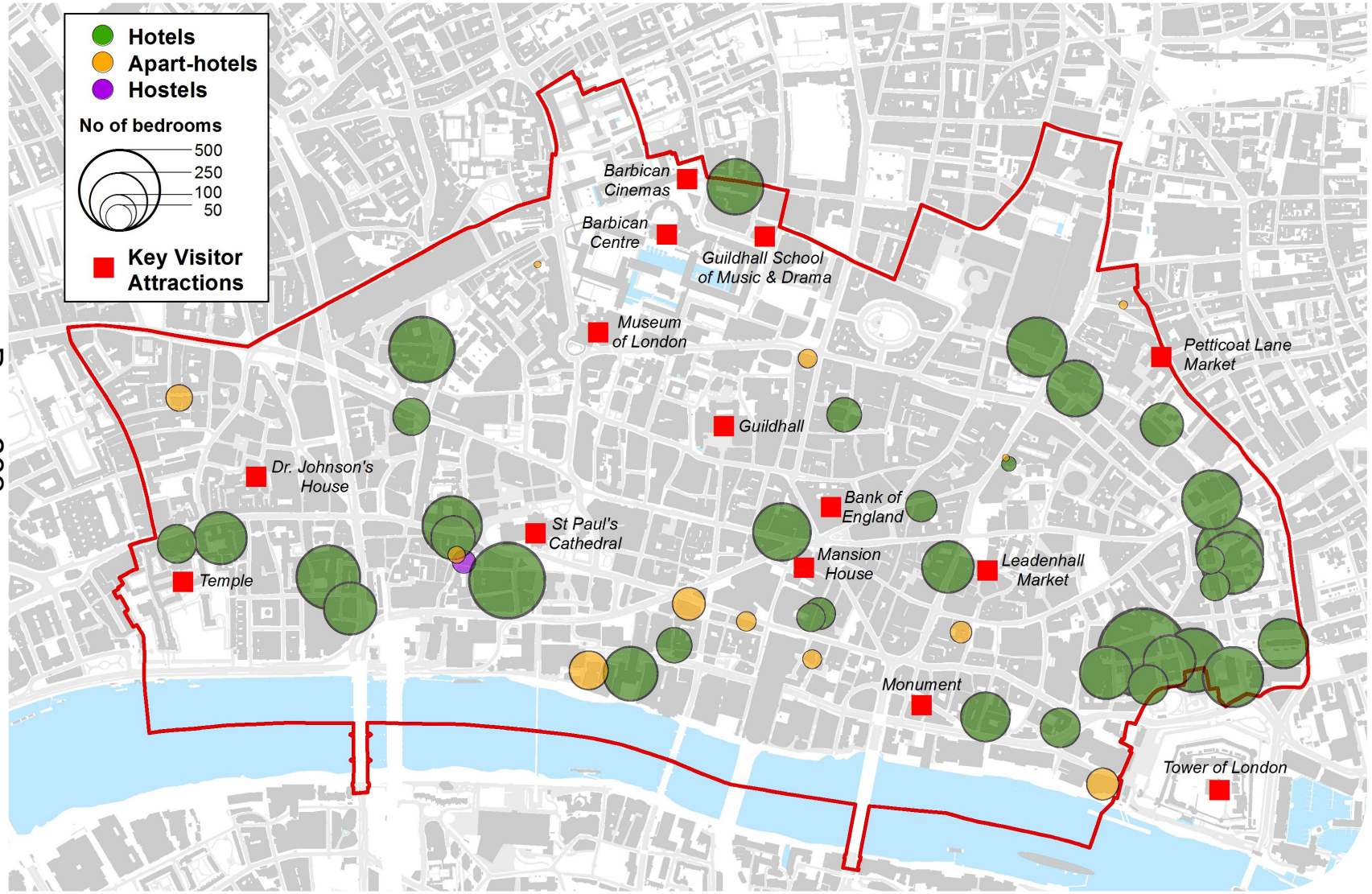


Figure 6: Hotels and Visitor attractions

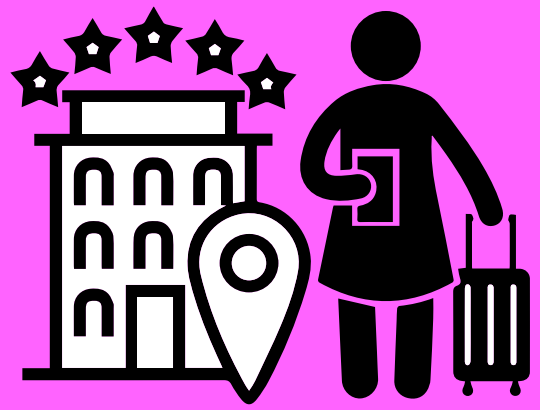
7 Culture & Visitors

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).



The City has **43** hotels, apart-hotels and hostels, providing **7,552 bedrooms**. A further **33** serviced apartments provide **1,551 units**.

7 Culture & Visitors

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:

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

   b. 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.



7 Culture & Visitors

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

7 Culture & Visitors

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 Culture & Visitors

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 Culture & Visitors

Policy CV6: Public Art

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

   a. encouraging the provision of new permanent, temporary, inclusive, diverse and high quality artworks in appropriate locations in the City on public and private land and buildings;

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   b. protecting existing works of art, statues, memorials and other objects of communal and cultural significance;

   c. ensuring that financial provision is made for the continuing maintenance of new public art;

   d. requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped;

   e. encouraging the use of new emerging artists, and those from under-represented groups and public art programmes.

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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7 Culture & Visitors

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 Infrastructure

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:
   a. Minimise the demand for power, water and utility services;
   b. Incorporate sustainable building design and demand management measures;
   c. Connect to existing pipe subways where feasible, particularly where there is pipe and cable congestion under the streets;
   d. 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.



8 Infrastructure

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 Infrastructure

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:

    a. 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;

    b. Heating and cooling demand and viability of provision. Designs should incorporate connections to existing decentralised energy networks where feasible;

    c. 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;

    d. 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.

8 Infrastructure

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 Infrastructure

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 Infrastructure

Policy IN2: Infrastructure Capacity

MM23

1. Development must not lead to capacity or reliability issues in the surrounding area and should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers ~~capacity projections must take into account the impacts of climate change which will influence future infrastructure demand~~.

2. Developers are required to ~~demonstrate, through effective engagement with~~ provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.

3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, ~~which may require the provision of~~ and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades.



8 Infrastructure

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.

AM45 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. Where capacity problems are identified, developers should work collaboratively with utility providers to find a solution. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.

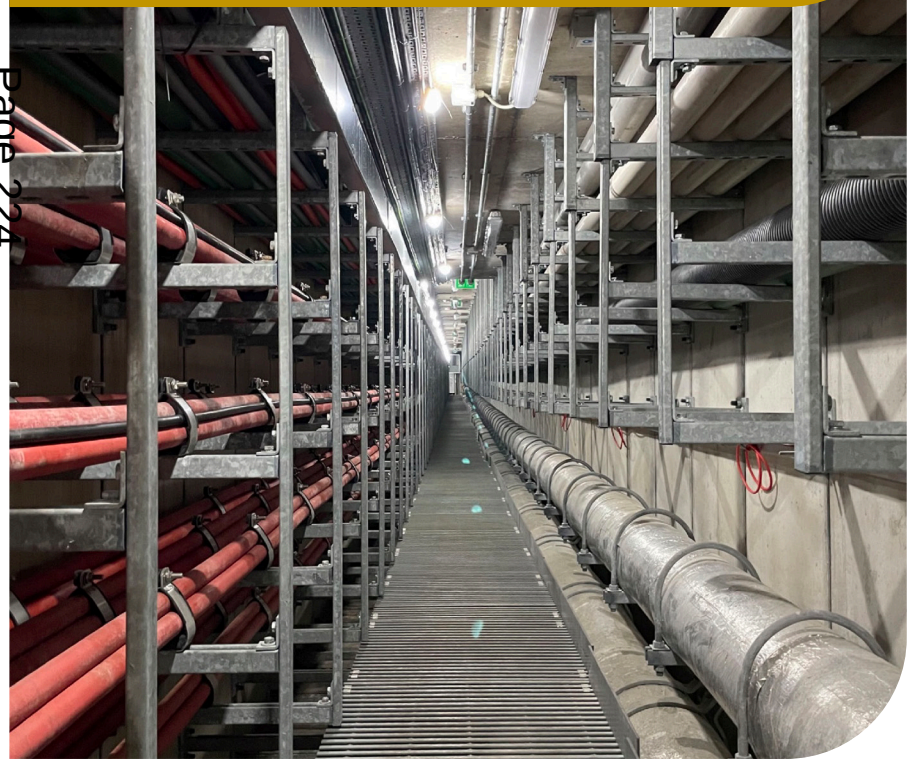
8.3.5 Redundant plant should be removed where possible to facilitate future infrastructure connections. Redundant infrastructure within the public realm, such as telephone boxes, should be removed unless it is of heritage interest.



8 Infrastructure

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.



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.

9 Design



9 Design

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;

AM46

4. Delivers world class sustainable buildings that are adaptable ~~and informed by~~ designed with best practice circular economy principles and ~~that~~ treat materials as a valuable resource;

AM47

5. Embeds climate resilience into the early design concept to ~~and~~ contribute~~s~~ to the resilience of the Square Mile; and

AM48

6. Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial embodied carbon emissions.

Form and Layout

7. Optimises site capacity, informed by the character of the area and its potential for growth;

AM49

8. Delivers buildings and spaces that have ~~the right~~ an appropriate 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;

AM50

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, squares, 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;

9 Design

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.

9 Design

Reason for the policy

MM24 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, retrofitted 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.

AM51 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~~ upfront embodied 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

MM25 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 life-cycle carbon of different development approaches.

MM26 9.1.4 Options appraisals should also be informed by the potential for wider environmental sustainability benefits for the site, its context and the whole City before considering ~~the many wider~~ other 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.

MM27 9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.

9 Design

Policy DE1: Sustainable Design

MM28 1. Development proposals should ~~follow~~ adopt a retrofit first approach. ~~thoroughly exploring the potential for retaining and retrofitting~~ At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste. ~~existing buildings as the starting point for appraising site options.~~

AM52 2. All major development must undertake an assessment of the feasable options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, ~~and should use this process to establish~~ to inform the most sustainable and suitable approach for the site.

MM29 3. Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment at planning stage and post construction.

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:

   a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;

   b. Floorspace adaptability to maximise the lifespan of buildings;

MM30 c. Retention, refurbishment, retrofit and reuse ~~Reuse, refurbishment and retention~~ of existing buildings, structures and materials to reduce reliance on virgin resources;

   d. Designing for disassembly, reuse and recycling of deconstruction materials;

   e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and

   f. 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:

   a. 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). The

MM31

9 Design

adaption to climate change credit Wst 05 must be achieved in the waste category ~~Climate resilience credit should be achieved for the waste category~~;

b. Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); ~~Commit to achieving a minimum NABERS UK rating of 5 stars;~~

c. Demonstrate that London Plan guidance on operational 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;

d. Retain existing buildings and structures where feasible to reduce embodied carbon emissions and waste;

e. Demonstrate climate resilience in building and landscape design;

f. 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

g. 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.



9 Design

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 – reducing ~~retaining~~ embodied carbon emissions from new build construction through retrofit and ~~in existing buildings and materials, and improving~~ resource efficiency.

MM32

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,



9 Design

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-cycle carbon ~~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.

AM53

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 Design

MM33 9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) 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.
- A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.

AM54

- An energy assessment in line with the Mayor of London's Energy Assesment ~~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~~ be at least Air Quality Neutral, 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 and other environmental sustainability improvements for the site, its context or the City as a whole. ~~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.~~

9 Design

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.

MM34

- For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.

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 Design

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:

   a. 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;

   b. The site layout takes account of established and potential pedestrian desire lines enhancing pedestrian permeability;

   c. Buildings and public spaces are inclusive and accessible for everyone;

   d. 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;

   e. Elevations have active, engaging and welcoming street frontages;

   f. The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements;

   g. Innovative design approaches are used to create high quality buildings that meet high sustainability standards, and integrate well with the surroundings;

   h. It is constructed using appropriate, high quality, low carbon, sustainable and durable materials;

   i. 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;

   j. 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;

   k. 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;

   l. 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.

9 Design

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

9 Design

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 Design

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 Design

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;

AM55

7. Opportunities ~~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.

9 Design

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 ream, 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.



9 Design

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

9 Design

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 Design

Policy DE4: Terraces and Elevated Public Spaces

1. Roof terraces will be encouraged where:

   a. The roof terrace is visually integrated into the overall design of the building when seen from both street level and elevated viewpoints;

   b. 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;

   c. Historic or locally distinctive roof forms, features or structures can be retained and enhanced;

   d. There would be no adverse impact on protected views;

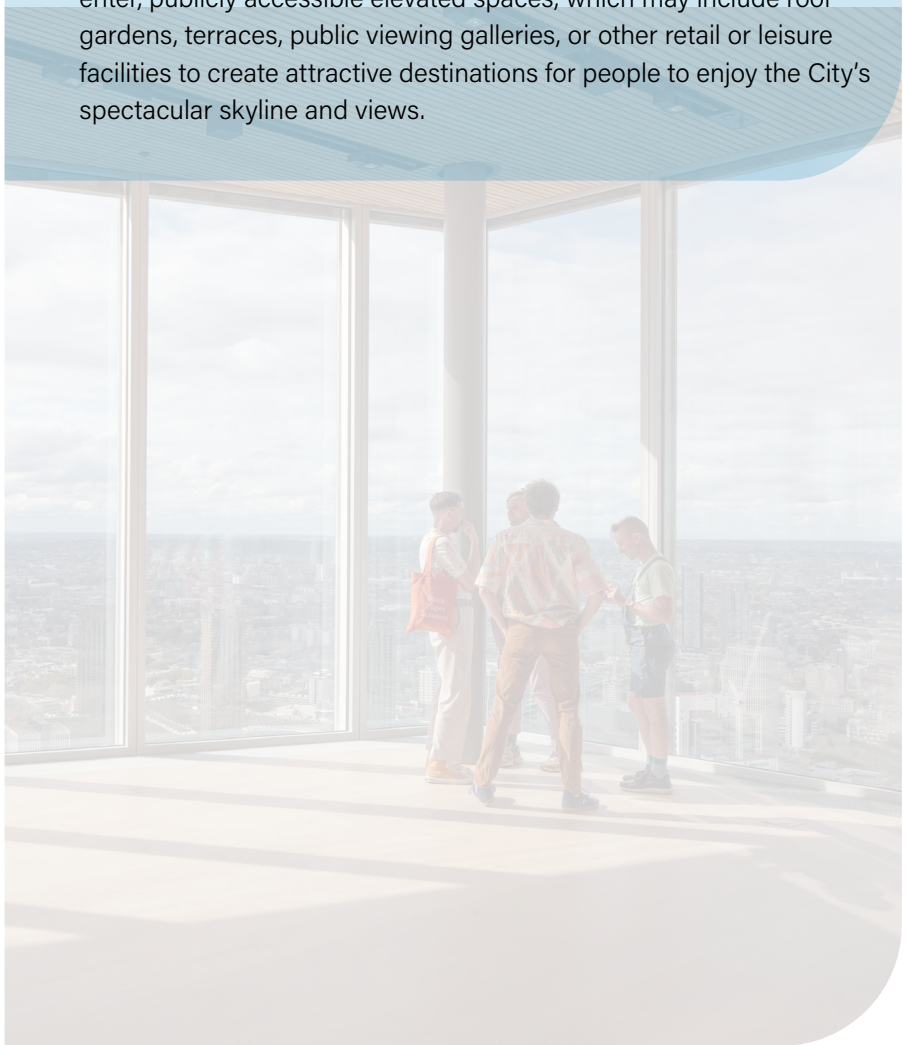
   e. The design and layout of the terrace optimises the potential for urban greening;

   f. 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.

MM35

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.



9 Design

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 Design

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.



9 Design

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.

AM56 9.6.6 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 Design

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.

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 Design

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. AM57

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.



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 including churchyards, 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.

9 Design

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 Design

Policy DE8: Lighting

AM58

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, places of worship, relevant open spaces including churchyards 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.



9 Design

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 Transport

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:
    a. Not providing any additional on-street car and motorcycle parking;
    b. Identifying opportunities to use on-street parking reductions and restrictions to discourage private vehicle use;
    c. Designing and managing streets in accordance with the City of London street hierarchy;
    d. 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;
    e. 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;
    f. Requiring the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
    g. Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
    h. 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 vison policies to minimise danger of travel and servicing, including through the use of river transport.

AM59

10 Transport

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.



10 Transport

Movement function	Proposed category
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 2: City of London street hierarchy

10.1.2 The TfL network (classed 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. Changes to the highway network at Bank Junction and the changes to the St Paul's Gyratory are reflected in the street hierarchy.



10 Transport



Figure 7: Proposed Street Hierarchy

AM60 Temples

10 Transport

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.

AM61 10.1.6 The City Corporation will work with TfL and Network Rail 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 Transport

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.

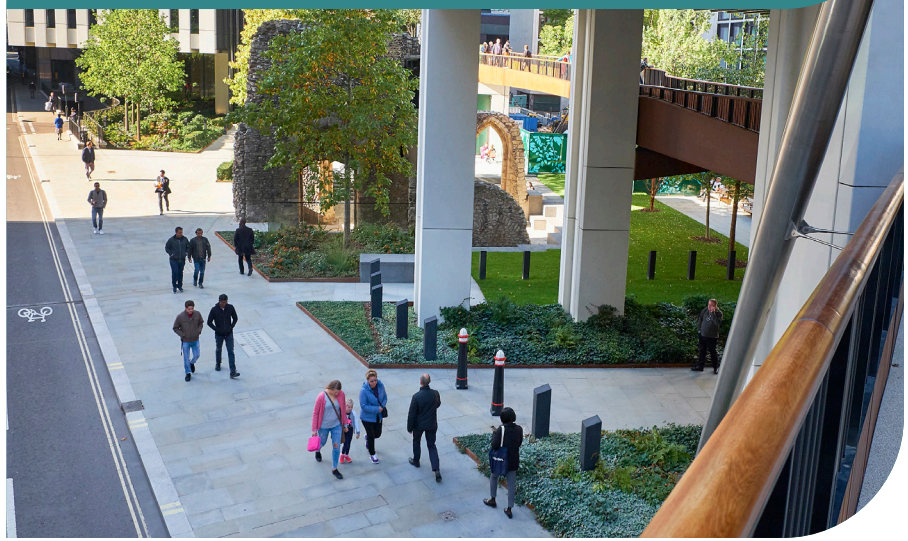
2. Where development would result in adverse impacts on the transport network, these must be demonstrated at pre-application stage and mitigated though site/building design, public highway works and management of operational activities. Appropriate measures to adapt public highway to mitigate the impact 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	1,000m²
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.



10 Transport

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 Transport

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

AM62 work with relevant stakeholders such as TfL and Network rail and 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 Transport

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.

10 Transport

Reason for the policy

AM63 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. Noise from freight vehicles moving on City streets and movements within servicing bays can impact the amenity of residents and workers. 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.

10 Transport

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^2 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 Transport

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.

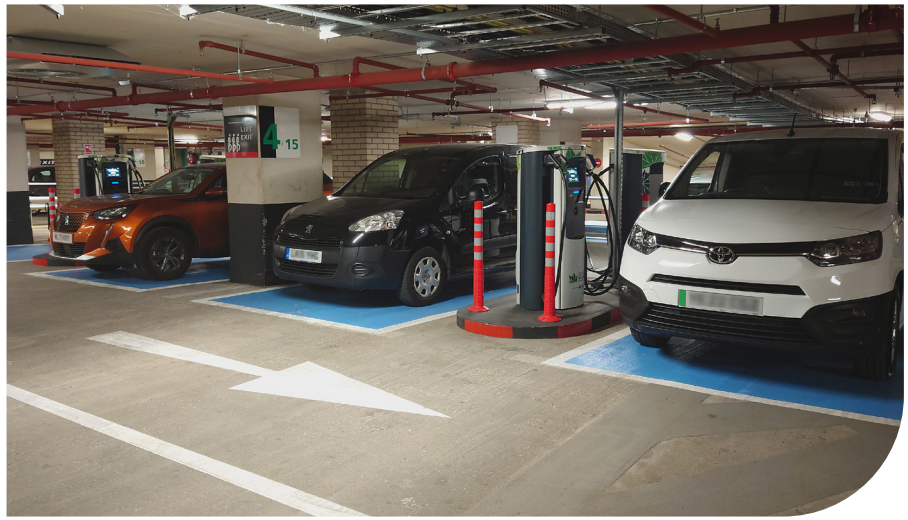
2. No new public car parks will be permitted, including through the temporary use of vacant sites.

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.

MM36

4. All off-street non-residential bays for car parking facilities must be equipped with active electric vehicle charging points usable from the outset.

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

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 Transport

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.



10 Transport

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.

Policy VT5: Aviation Landing Facilities

1. Heliports will not be permitted in the City. Individual helipads will only be permitted where they are essential for emergency or security purposes.

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.

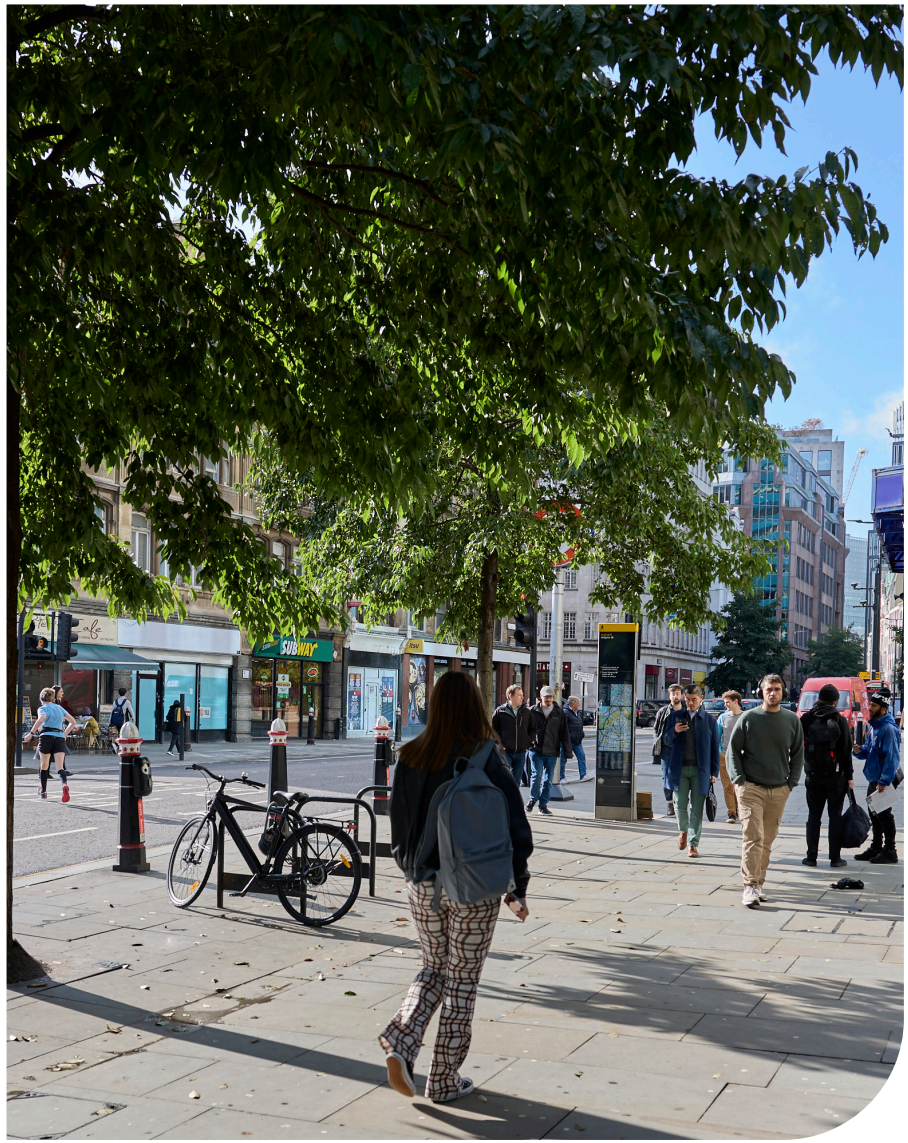
10.6.2 The City Corporation's Transport Strategy sets out principles that will apply to the potential use of drones in the City. The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space,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

10 Transport

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.



10 Transport

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.

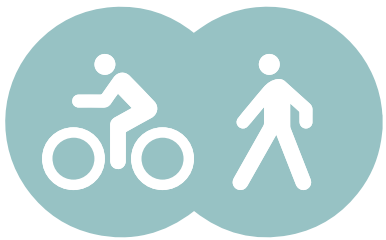
10.7.3 The Mayor's Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking, wheeling and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk, wheel and cycle.



10 Transport

How the policy works

AM64 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 working jointly with neighbouring boroughs where appropriate 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.



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



Figure 8: Mayor's Transport Strategy Healthy Street Indicators

10 Transport

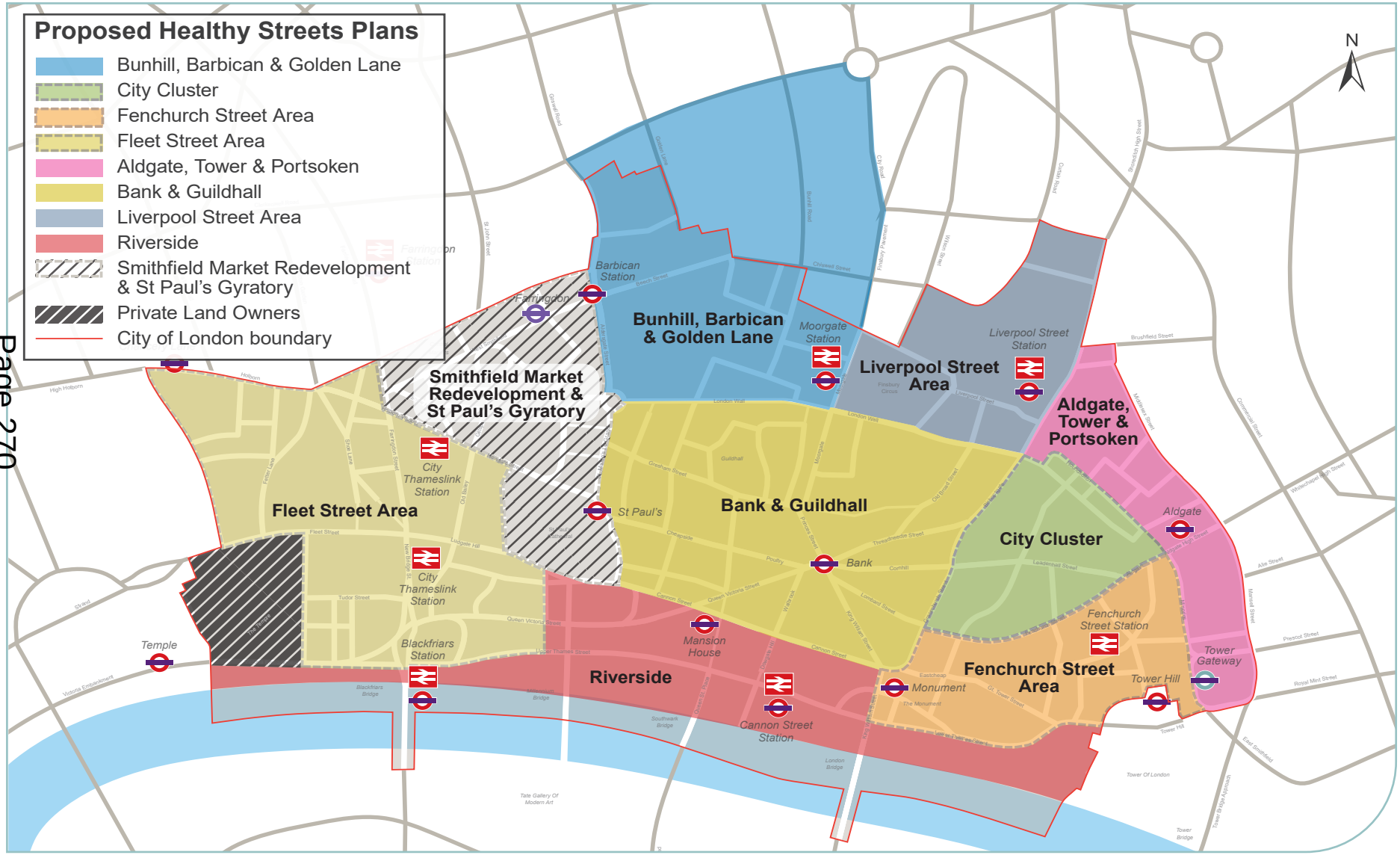


Figure 9: Proposed Healthy Street Plans

10 Transport

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:

    a. legible, good quality, safe and low pollution pedestrian connections between spaces;

    b. 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;

    c. publicly accessible ground floors for improved pedestrian movement, where feasible;

    d. 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:

    a. The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;

    b. The shortest practicable routes between relevant points.

    MM37 c. Opportunities to enable improved and new connections through to mainline railway stations to promote use.

5. 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.

6. 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.

7. 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 Transport

8. 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.

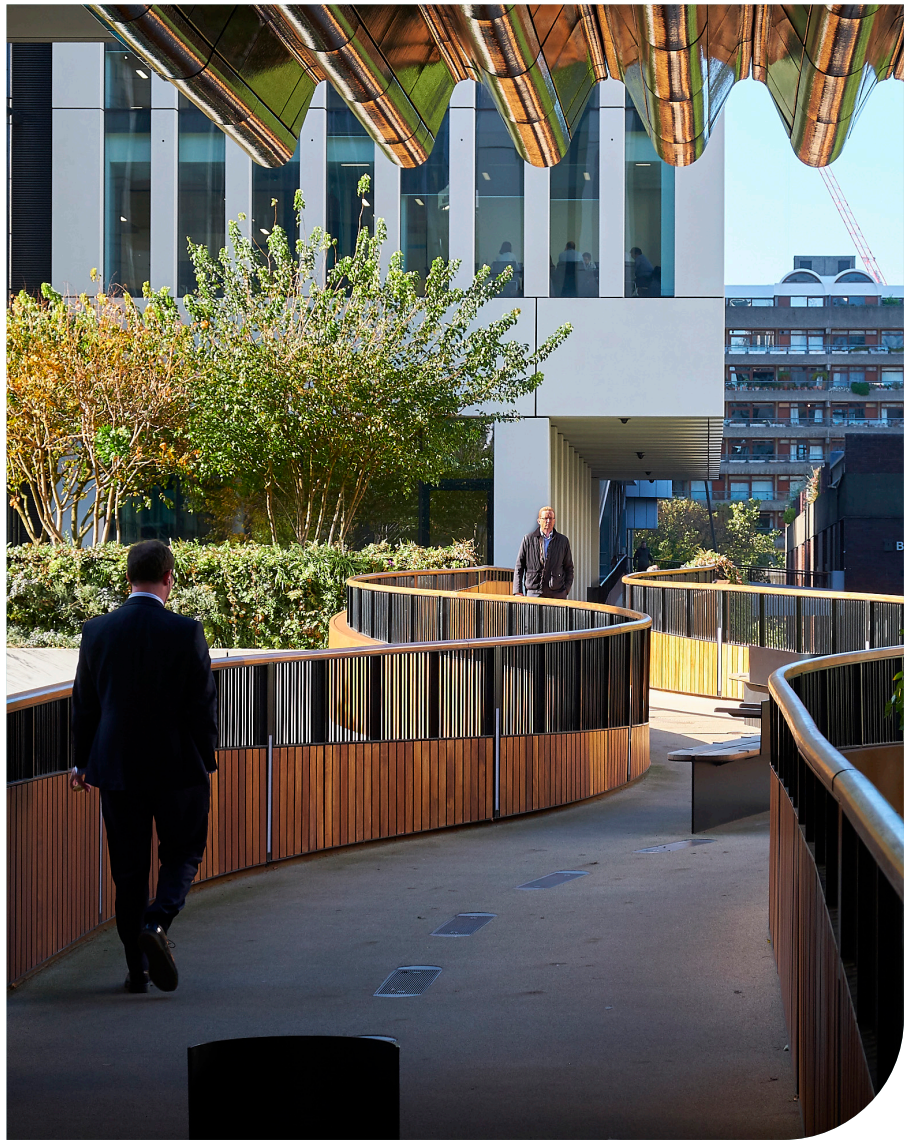
9. Improved wayfinding will be sought through new development and public realm improvements. Improvements sought will include:

    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

10. Better revealing 'hidden' routes, courts, alleys and other spaces in ways that respect and celebrate their character and heritage.

11. Major development proposals should model the pedestrian flow impact of new development.



10 Transport

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.

10 Transport

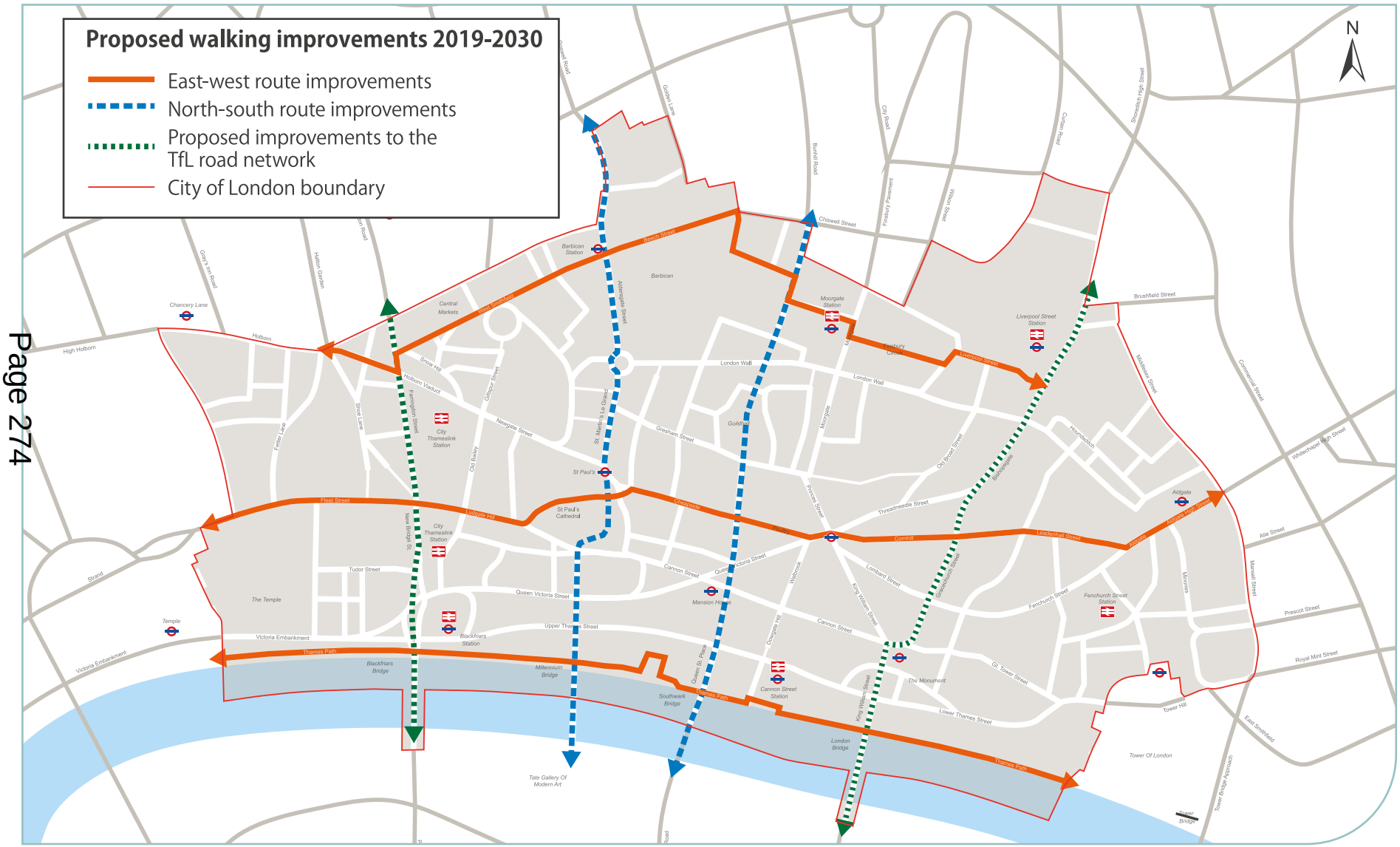


Figure 10: Proposed walking improvements (2019-2030)

AM65 Temples

10 Transport

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.

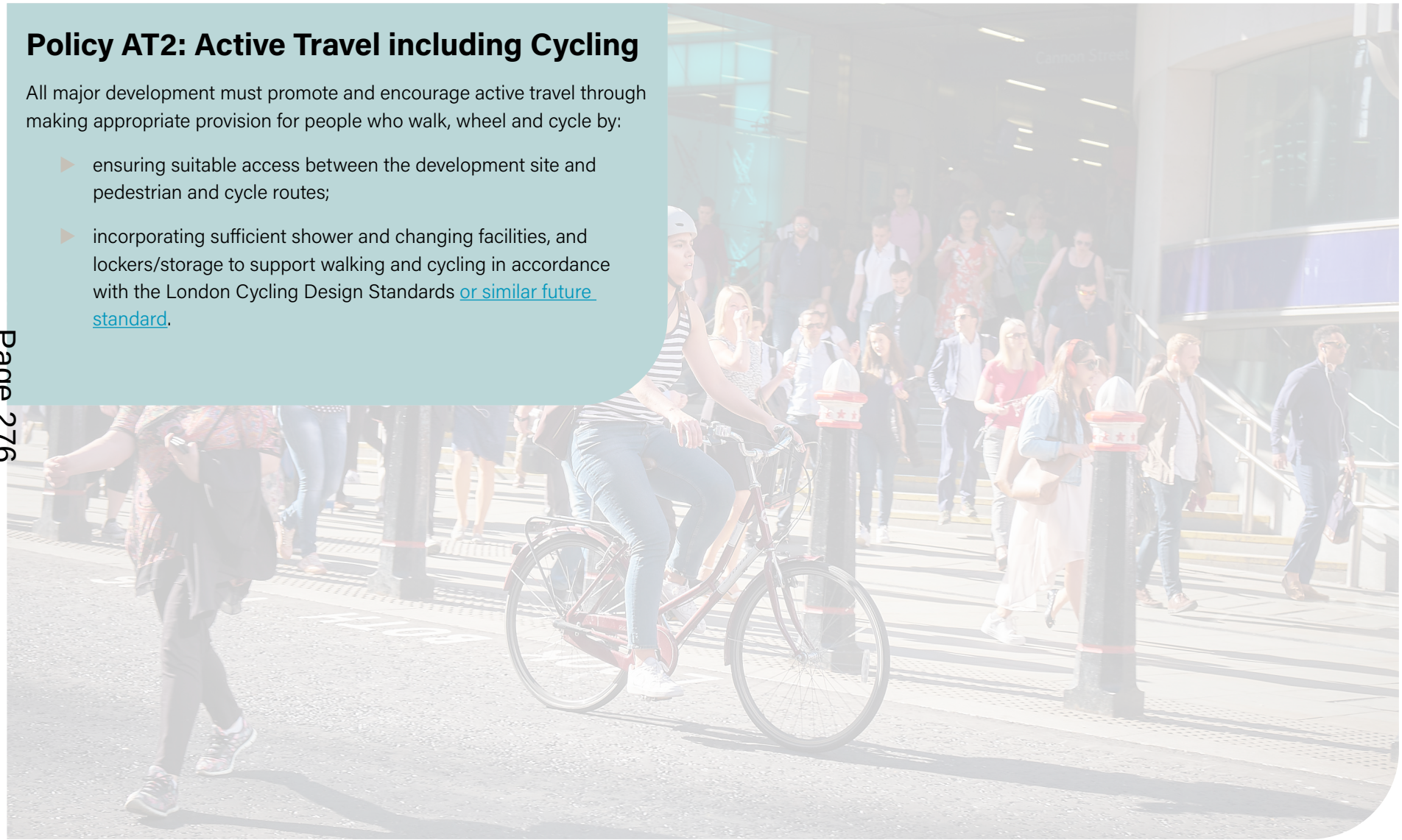
10 Transport

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 or similar future standard.

AM68



10 Transport

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 the TfL cycle hire scheme 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.

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.

AM67

10 Transport

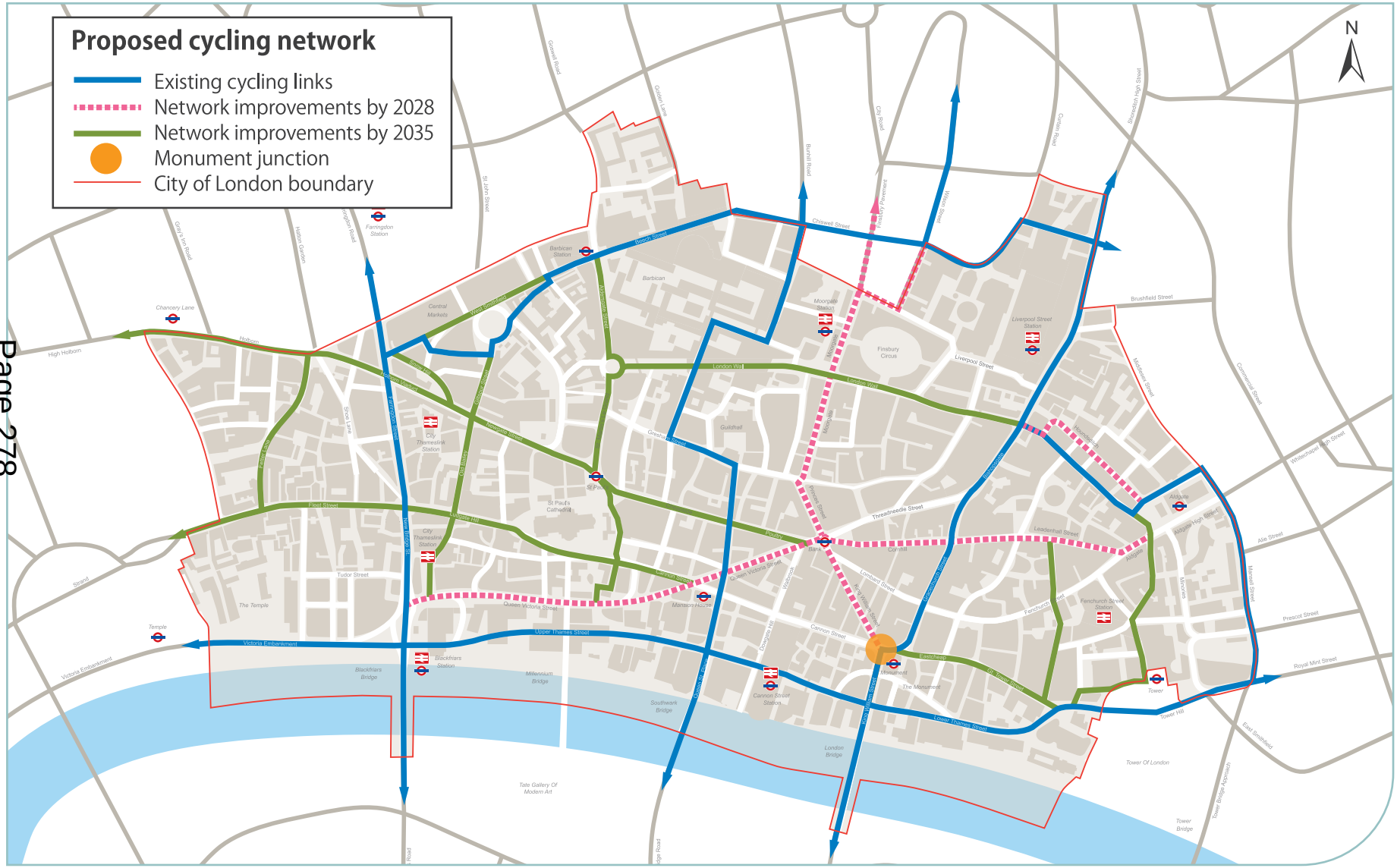


Figure 11: Proposed cycling network

AM66 Temples

10 Transport

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.

MM38

2. In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. 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.

AM69

5. Opportunities to provide space for dockless and TfL cycle hire docks parking should be explored where development would create or have an impact on existing public realm.



10 Transport

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

MM39 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. A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions. All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.

MM40 10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.

10.10.3 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.

10.10.4 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.

10.10.5 The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.

10.10.6 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.

11 Heritage & Tall buildings



11 Heritage & Tall buildings

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;
    f. 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.

11 Heritage & Tall buildings

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 17th century home on Cloth Fair, the unique early 18th 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.

11 Heritage & Tall buildings

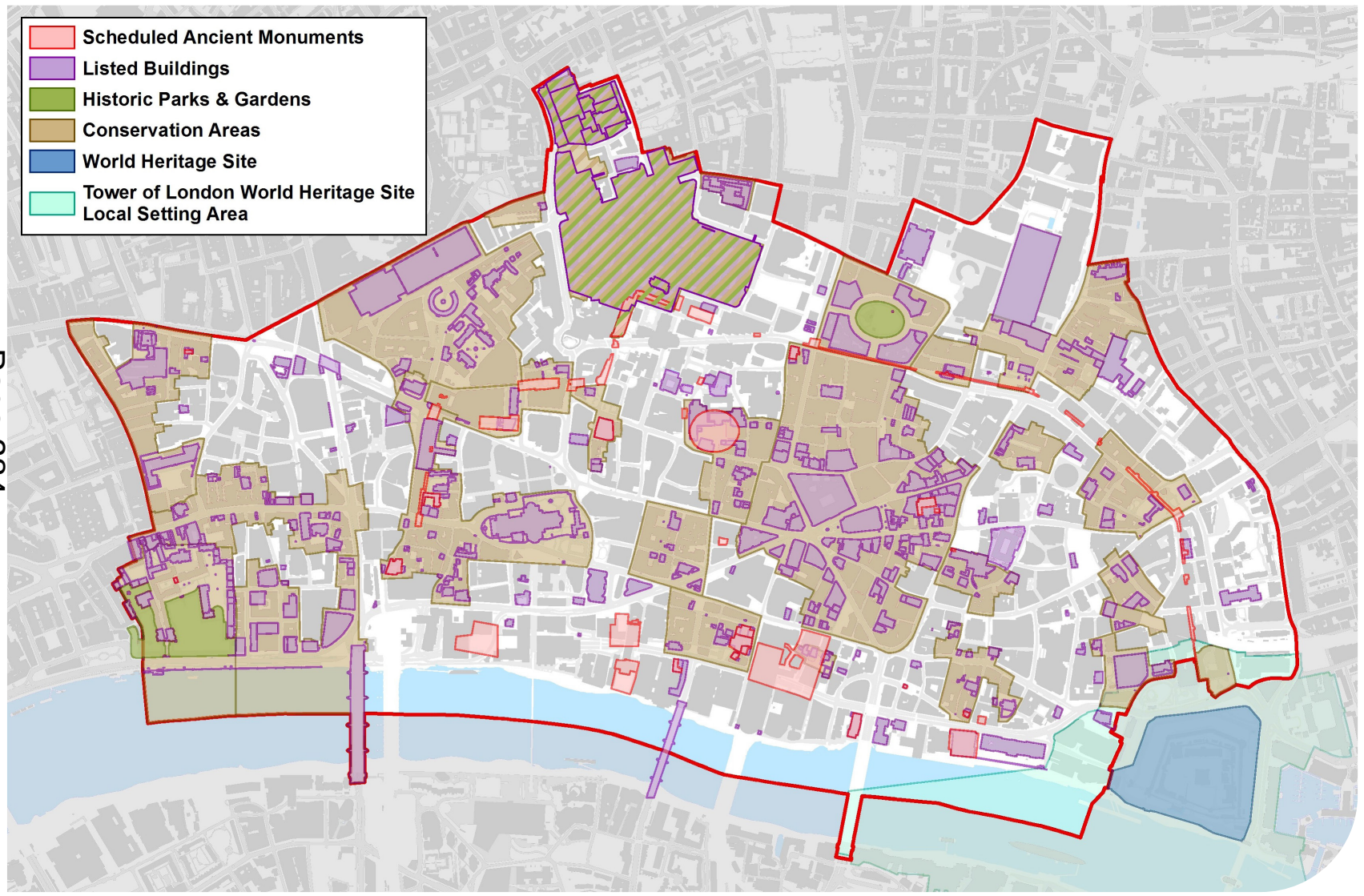


Figure 12: Designated heritage assets in the City of London

11 Heritage & Tall buildings

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 Heritage & Tall buildings

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;

MM41

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~~ sought where appropriate;

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;

AM70

8. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument ~~should~~ will be carefully managed to preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets; and,

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.

11 Heritage & Tall buildings

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

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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.

MM42 11.2.6 All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area. 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.

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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. Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance. Applicants should draw reference to the Character Areas Study and the Setting Study (where appropriate) to understand their site's significance and the key attributes of significance they should consider.

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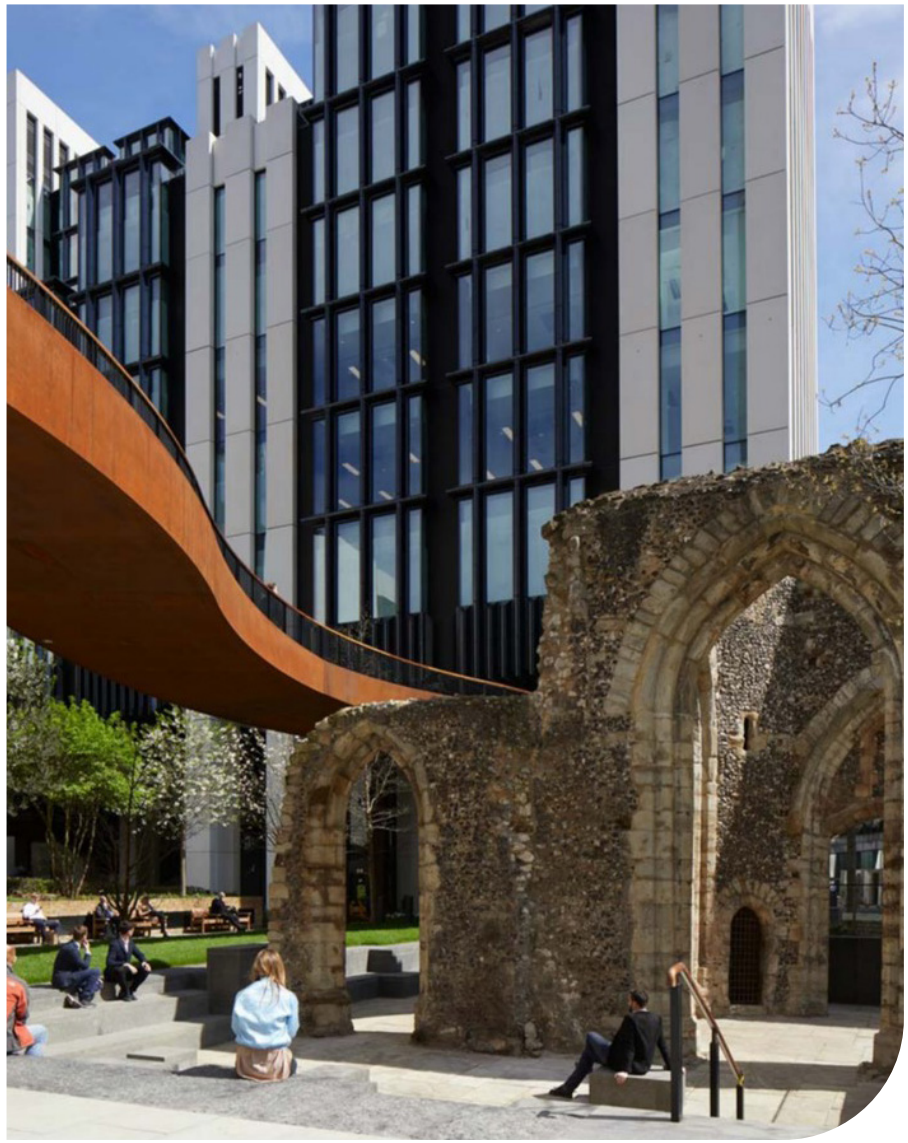
11 Heritage & Tall buildings

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.



11 Heritage & Tall buildings

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 Heritage & Tall buildings

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.

MM45 11.3.8 On sites where significant archaeological artefacts or features 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.



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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 that shows how the OUV of the Tower of London has been interpreted. MM46

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



11 Heritage & Tall buildings

Reason for the policy

MM47 11.4.0 The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.

11.4.1 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

11.4.2 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.

11.4.3 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.

11.4.4 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.

11.4.5 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 Heritage & Tall buildings

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

MM48 2. The tall building areas identified on the Policies Map and Figure 14 (City Cluster, Fleet Valley and Broadgate site) 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 MM49 form that contributes positively to the skyline and respects both heritage significance 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.

AM71 5. The suitability of sites for tall buildings within the identified areas will depend on the sensitivity of the relevant context to such proposals. Their ~~and their~~ design, height, scale and massing should t~~ake into consideration local~~ preserve and enhance the significance of heritage assets and take into consideration 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:

   a. the potential effect on the City skyline, the wider London skyline and historic skyline features;

   b. the character and amenity of their surroundings, including the relationship with existing and consented tall buildings;

   MM50 c. the significance of heritage assets and their ~~immediate and wider~~ settings;

   d. 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.

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Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants;

e. 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:

a. achieve exemplar standard of architectural quality and sustainable and accessible building design;

b. enhance the City skyline and views;

c. provide adequate levels of daylight and sunlight within the new development;

d. make a positive contribution to the townscape character;

e. make a positive contribution to the quality of public realm, incorporate active frontages at ground floor and create a positive pedestrian experience;

f. maintain adequate distance between buildings to ensure high quality experience at the street level;

g. enhance permeability by providing the maximum feasible amount of publicly accessible open space at street level;

h. 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;

i. provide consolidation of servicing and deliveries to reduce potential vehicle movements;

j. mitigate adverse impacts on the microclimate and amenity of the site and surrounding area and avoid the creation of building canyons; and

k. 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

AM72 of Smithfield, Fleet Street and the Temple~~s~~ 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 is 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.

AM73 11.5.2 The City contains many tall buildings; some are located in clusters or as standalone features, and unusually some are also heritage assets. 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. Taking into account the policies of the plan as a whole, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.

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

11 Heritage & Tall buildings

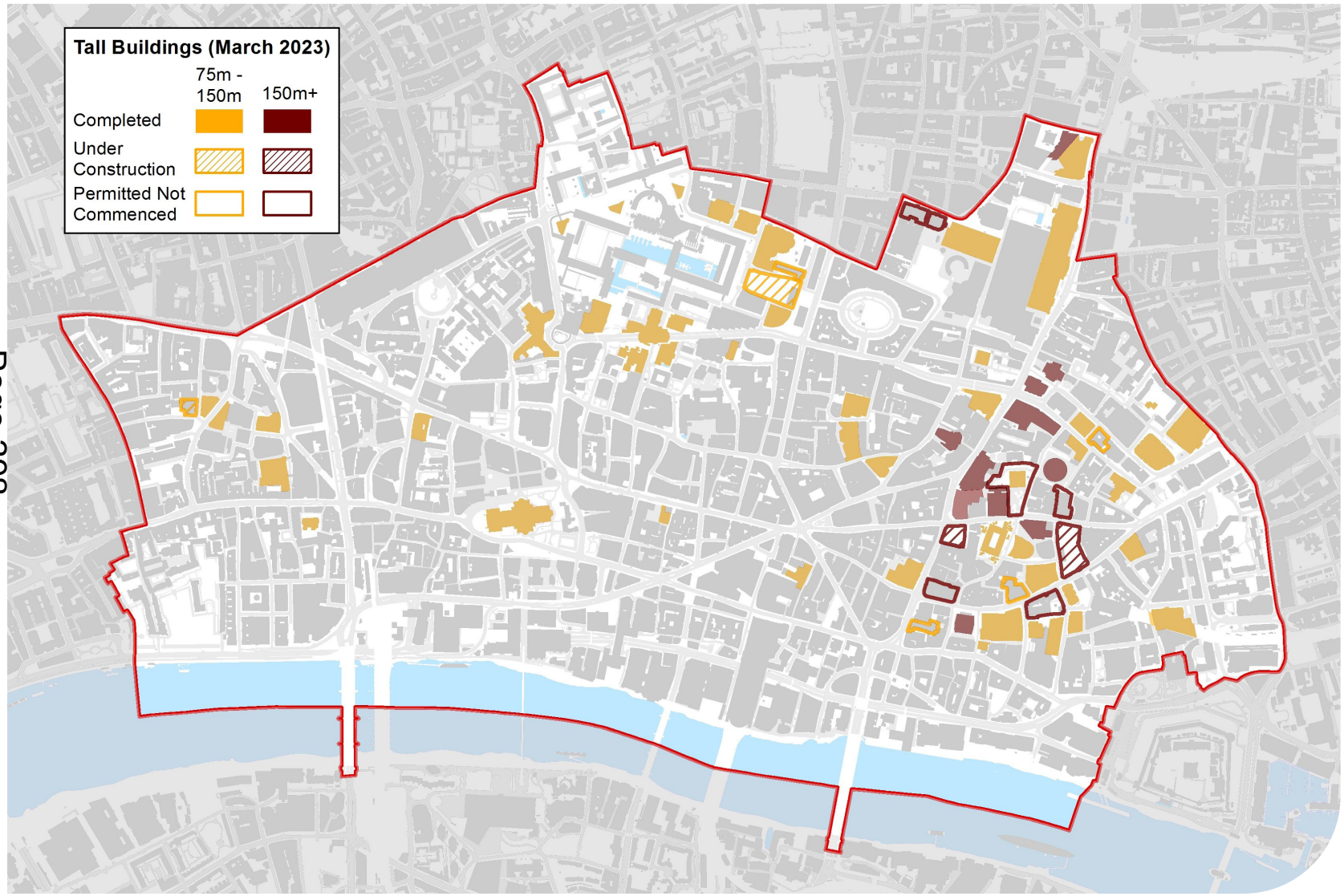


Figure 13: Tall buildings distribution (March 2023)

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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.

MM51 11.5.4 For the purposes of Policy D9 of the London Plan, the ~~The~~ tall building areas identified as being appropriate locations for tall buildings are the City Cluster ~~and~~ Fleet Valley and Broadgate Tall Building Site 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 new 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 new tall building areas, particularly on sites where there is no tall building currently, would be likely have 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.

MM52 11.5.6 The heights of the buildings in the City Cluster ~~and~~ Fleet Valley and Broadgate Tall Building site 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. These ~~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. a~~nd 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.

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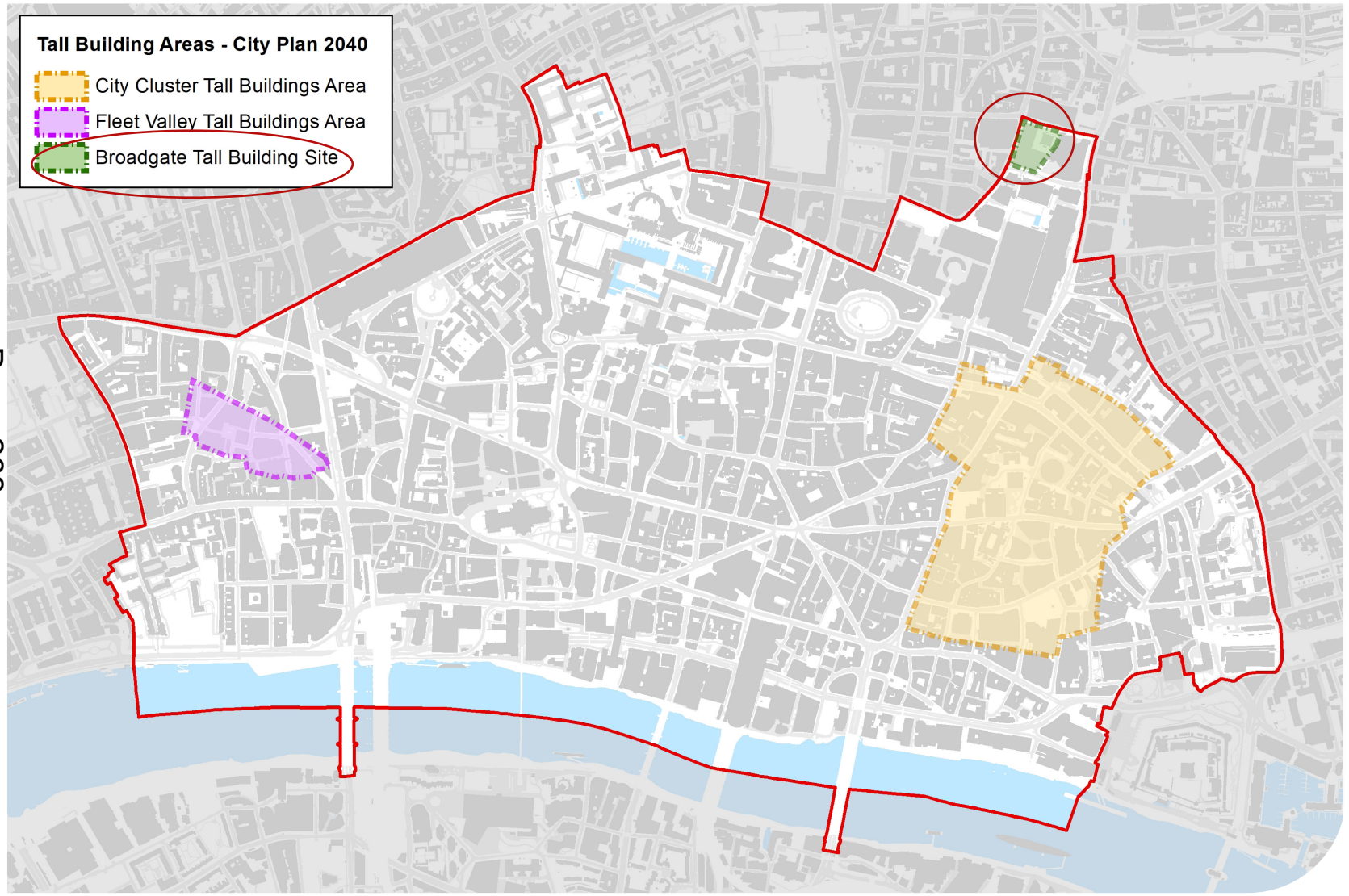


Figure 14: Areas appropriate for tall buildings

MM53 Change to show new Broadgate Tall Building Site as an area suitable for tall buildings

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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.

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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 historic environment townscape and skyscape including their cumulative effects.

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11.5.13 On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.

11.5.14 Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings including a number of conservation areas partially within the Cluster itself. The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential

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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.

11.5.15 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.

11.5.16 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.

11.5.17 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.



11 Heritage & Tall buildings

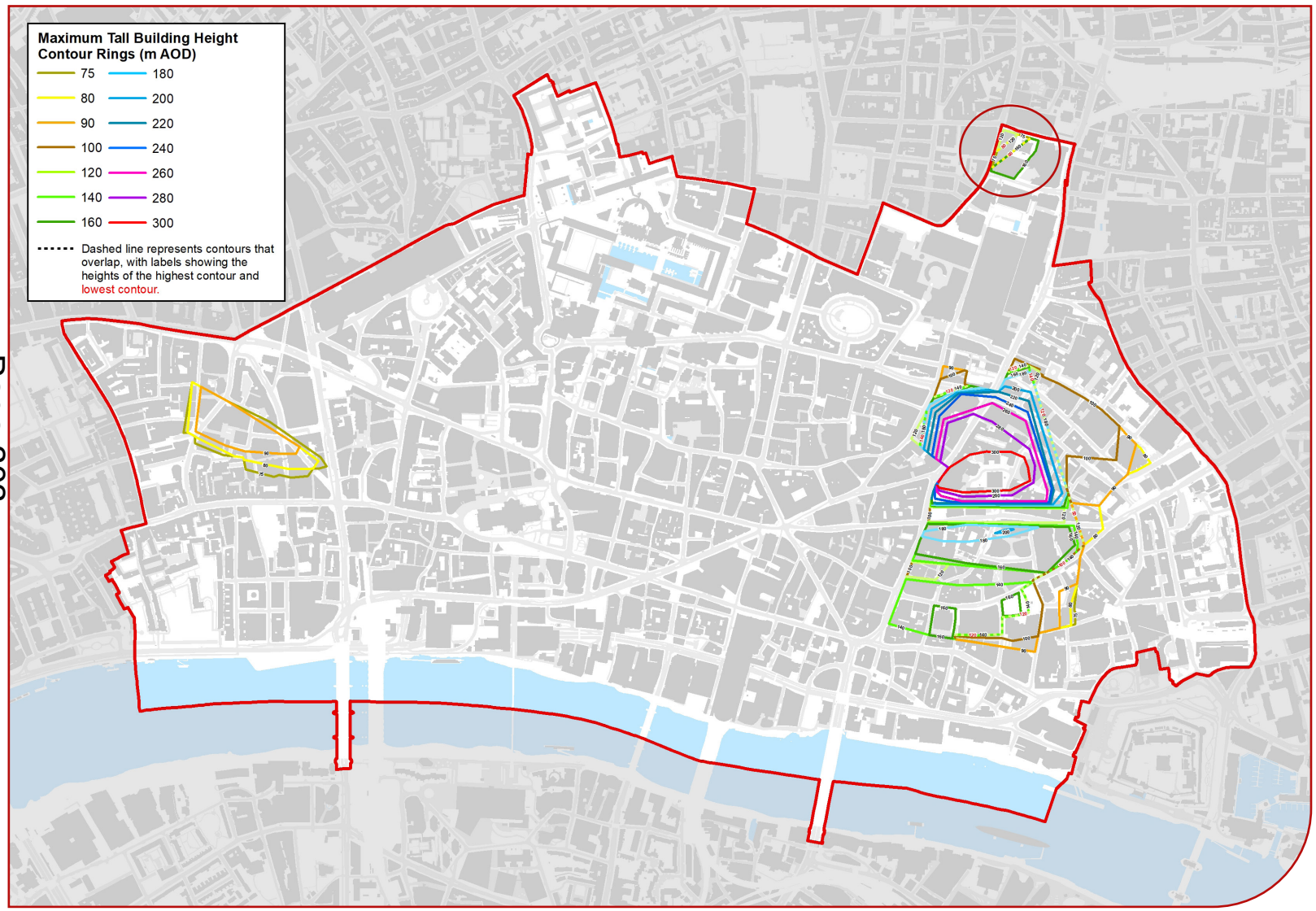


Figure 15: Tall building contours

MM56 Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site

11 Heritage & Tall buildings

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 and the settings 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.

11 Heritage & Tall buildings

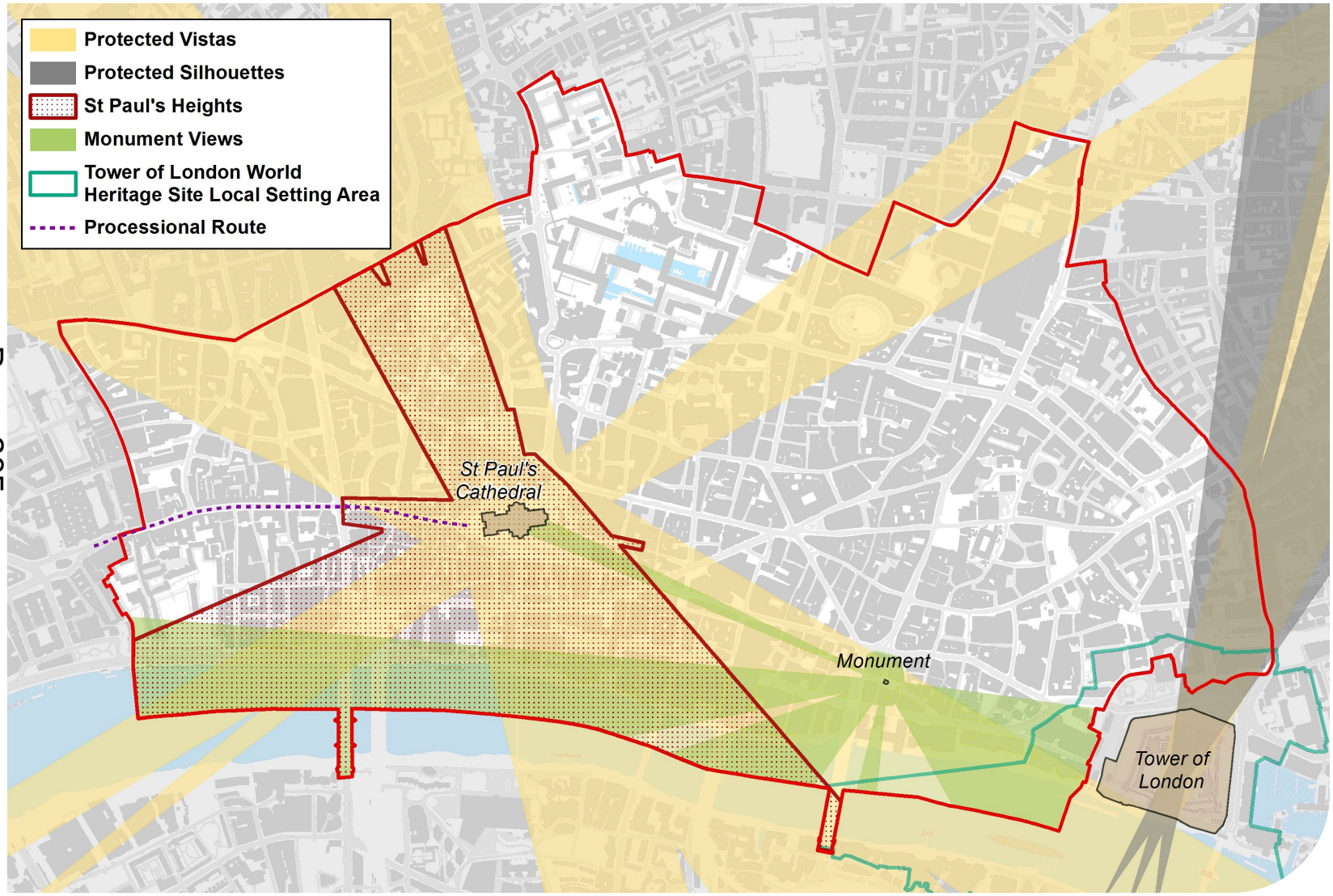


Figure 16: Protected views

11 Heritage & Tall buildings

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.

AM76 11.6.6 A revised and updated Protected Views Supplementary Planning Document (SPD) will be produced by the City Corporation, and will be informed by both public consultation and the evidence and views gathered as part of the plan making process. 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

11 Heritage & Tall buildings

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 Heritage & Tall buildings

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 & Green Infrastructure



12 Open Spaces & Green Infrastructure

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.



12 Open Spaces & Green Infrastructure

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.

12 Open Spaces & Green Infrastructure

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.



12 Open Spaces & Green Infrastructure



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.

12 Open Spaces & Green Infrastructure

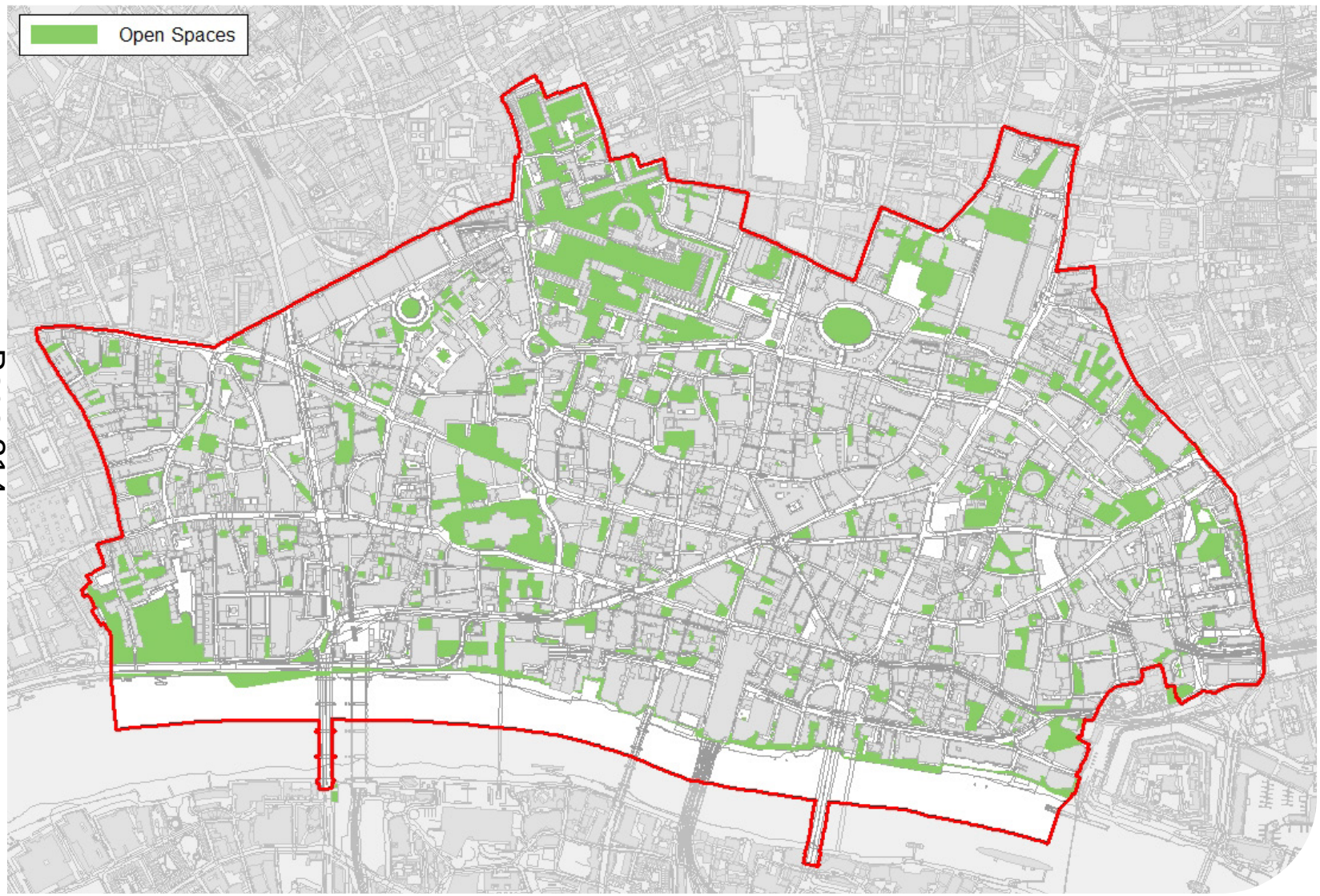
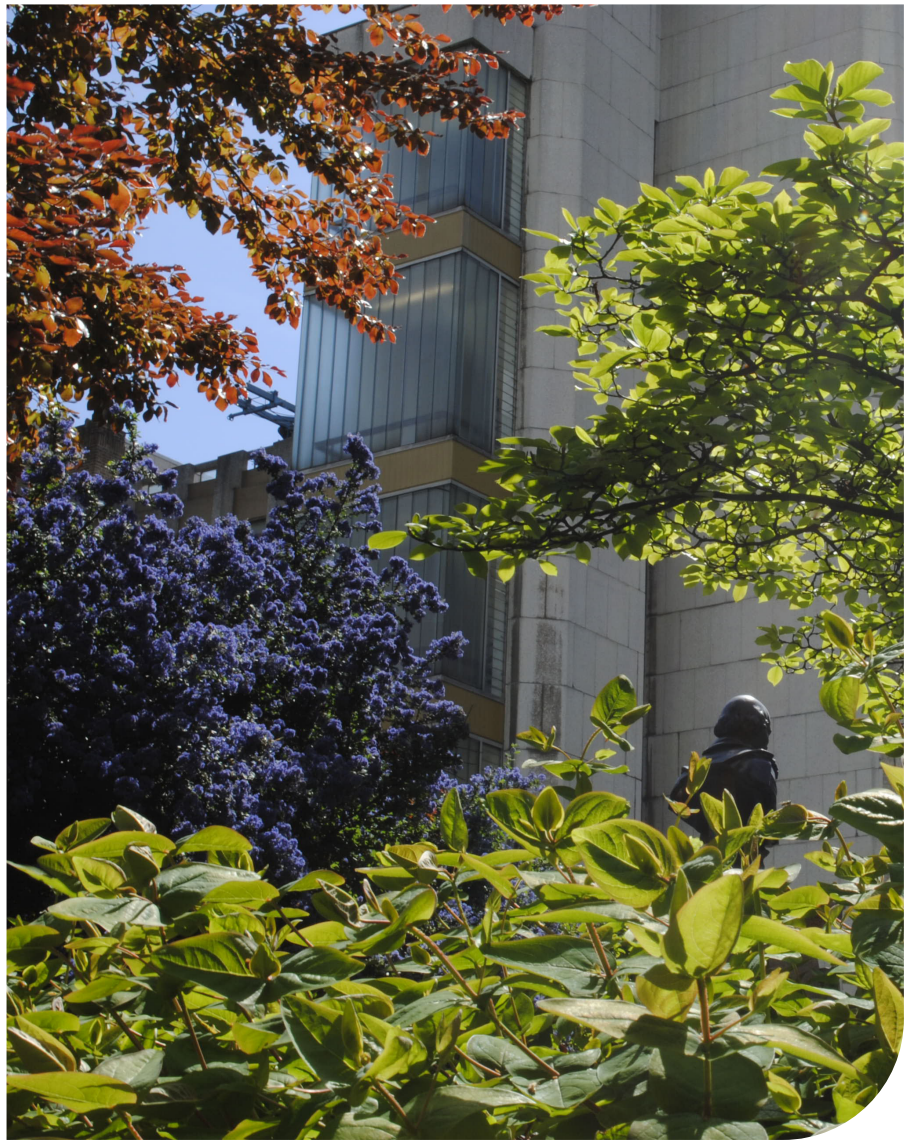


Figure 17: Open Spaces

12 Open Spaces & Green Infrastructure

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 Open Spaces & Green Infrastructure

Policy OS2: Urban Greening

1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.

    a. All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context;

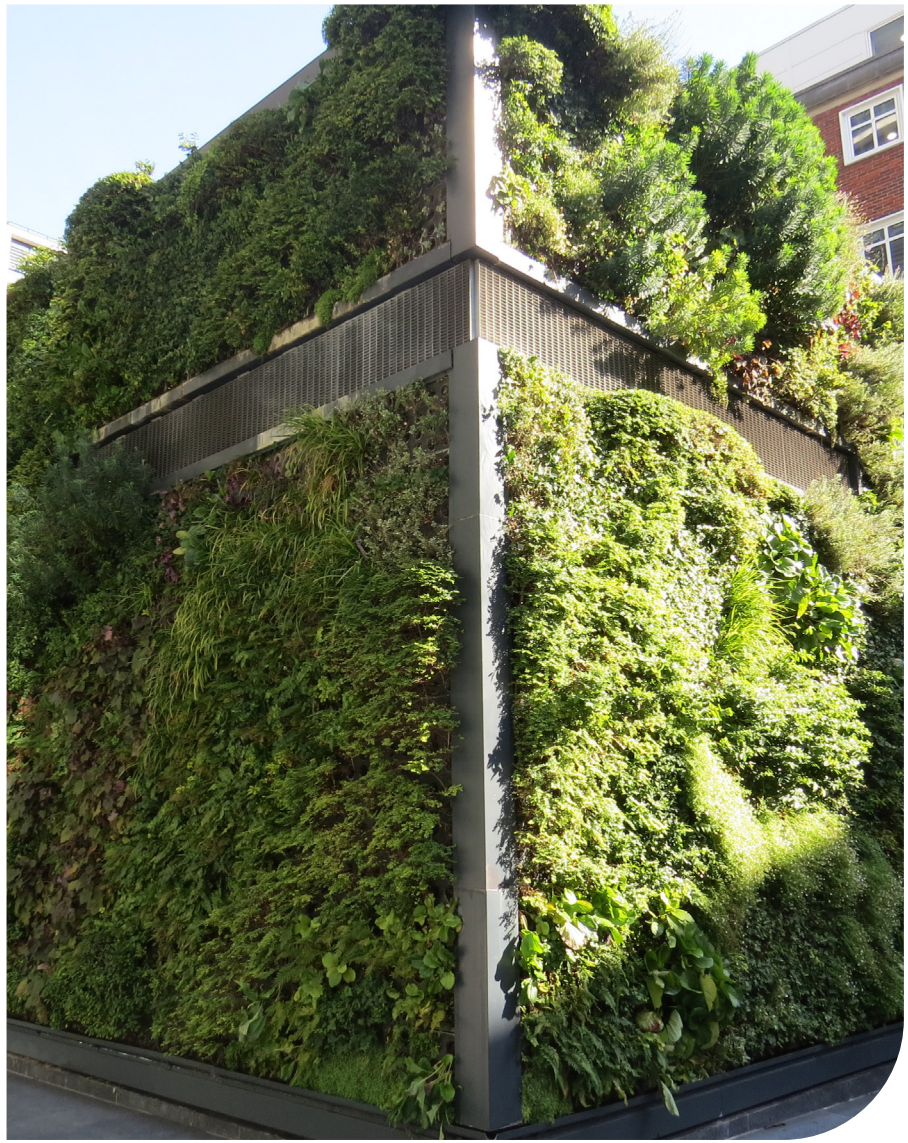
    b. The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought, where appropriate, and new development should not compromise these elements on existing buildings located nearby; and

    c. 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:

    a. 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

    b. Submit an operation and maintenance plan to demonstrate that the green features will be maintained and remain successful throughout the life of the building.



12 Open Spaces & Green Infrastructure

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 and appropriate, including through the design of public realm and sustainable drainage systems. This can. ~~Can~~ take many forms and require careful design, installation and regular maintenance.

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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

12 Open Spaces & Green Infrastructure

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.



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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.



12 Open Spaces & Green Infrastructure

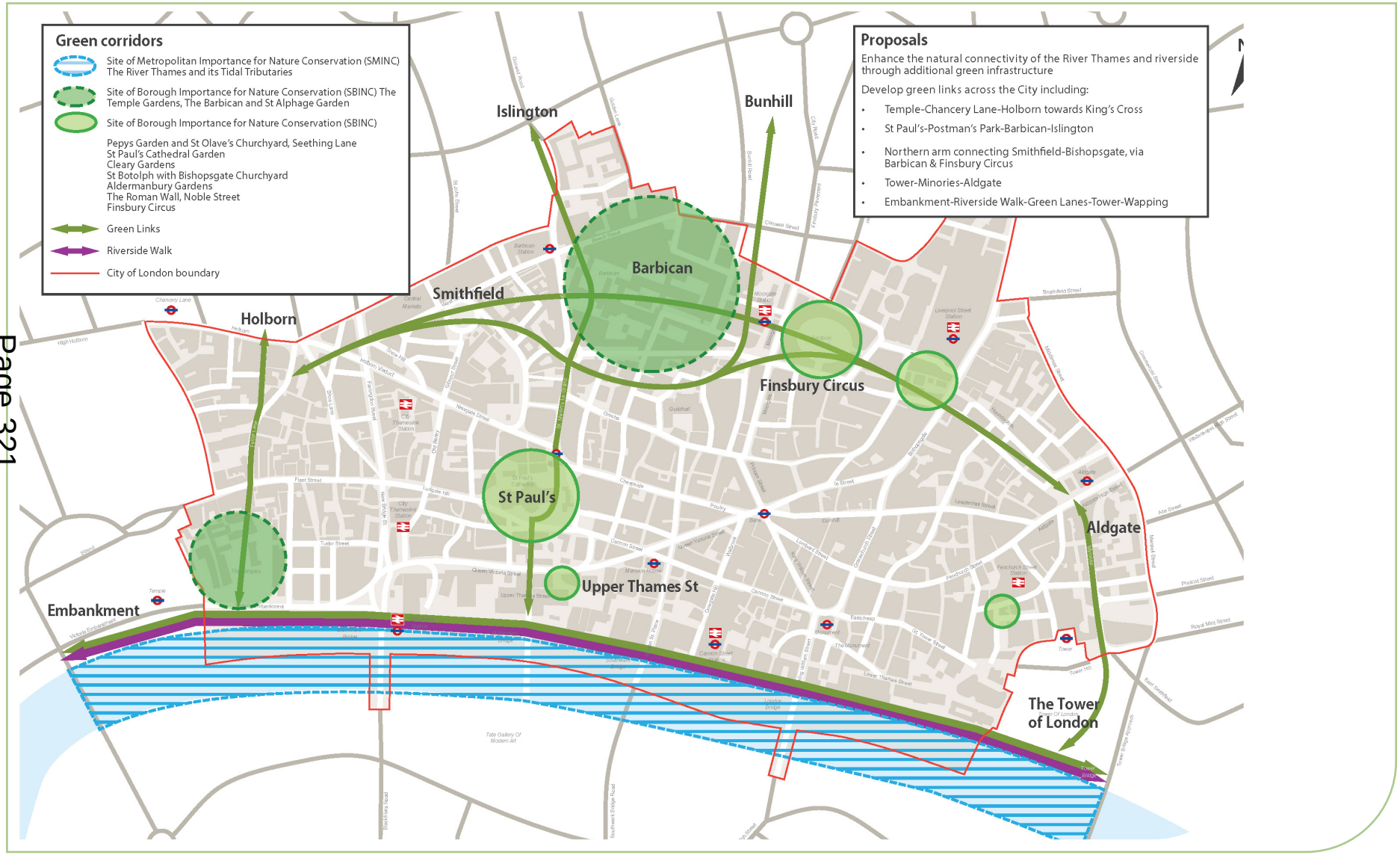


Figure 18: Green corridors

12 Open Spaces & Green Infrastructure

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 Estate and St Alphage~~'s~~ Garden and Barber Surgeons' 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.

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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 (~~D~~BM) ~~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

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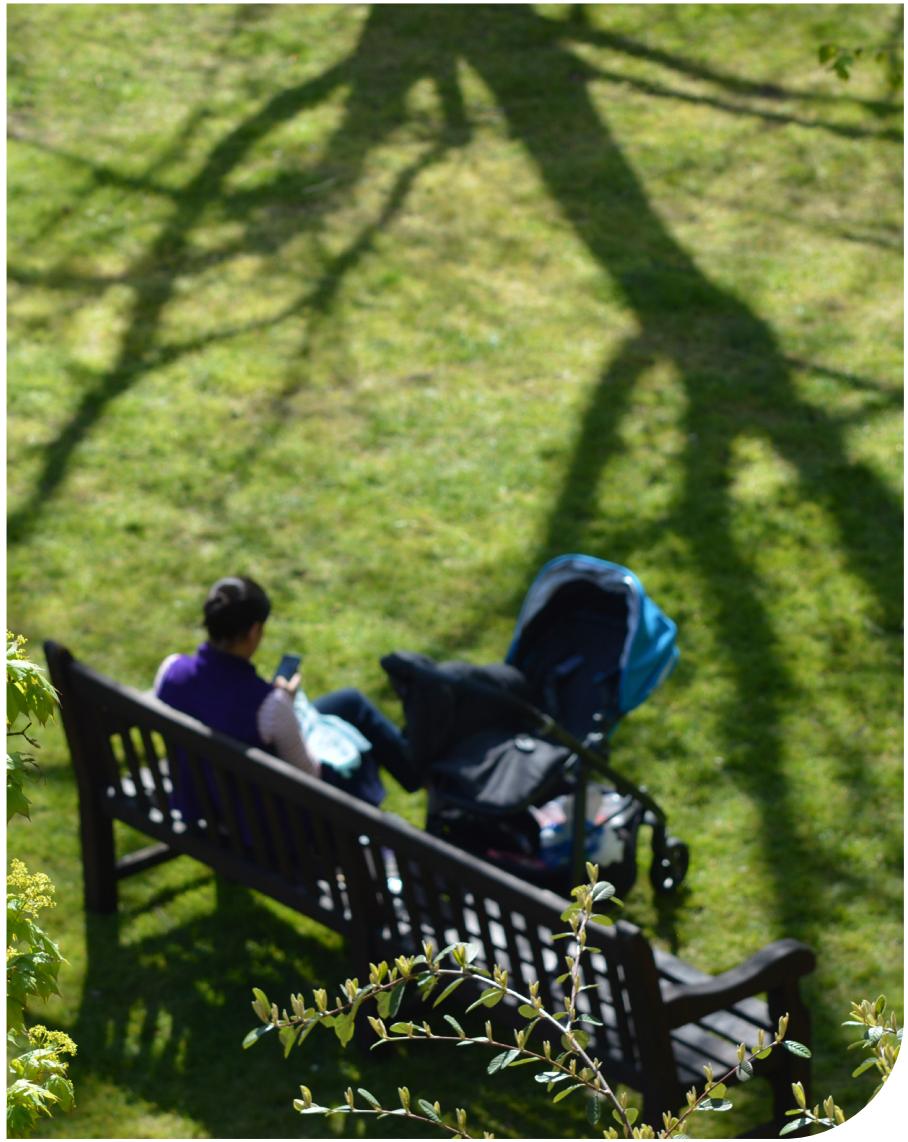
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ground nesting) for appropriate pollinators (including wild bees and bumblebees) and invertebrate hotels. This could include artificial interventions such as bee bricks, leaving areas of bare ground and creating mounds with the incorporation of sandy 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.



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Policy OS4: Biodiversity Net Gain

Major developments are required to deliver Biodiversity Net Gain (BNG) to protect and enhance biodiversity through the following measures:

1. Meeting the City Corporation's BNG target 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,

3. Prioritising and seeking to achieve onsite delivery of the BNG target. Offsite provision should be a last resort. If it is not feasible to achieve the target score onsite then offsite provision will be required, for any shortfall with preference given to schemes that help with the delivery of wider City of London Corporation policies and strategies, through the use of nature-based solutions and maximising opportunities for local nature recovery;

4. Providing the following information:

    a. A Biodiversity Gain Plan (BGP) should be submitted and approved prior to the commencement of the development and include the statutory Biodiversity Metric (BM) calculation tools and setting out the enhancements that will be incorporated on-site to meet the BNG score, secured through condition prior to commencement of the development;

    b. 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 using the Biodiversity Metric (BM). 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 an appropriate 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 alongside the Viability Assessment (2023) has informed the policy target set of achieving a minimum of three BU/ha rather than a percentage increase which may result in BNG of more than the statutory 10%.

How the policy works

12.5.2 All major developments are expected to submit a Biodiversity Metric (BM) 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 Biodiversity Gain Plans (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 BM 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 onsite providing biodiversity to the immediate area before offsite 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 BM. Developers are expected to set-out BNG as an integral design

12 Open Spaces & Green Infrastructure

aspect of the overall scheme and deliver meaningful ecology to increase levels of biodiversity in the City. 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 Open Spaces & Green Infrastructure

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.



12 Open Spaces & Green Infrastructure

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 Climate Resilience

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.

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1. Development must minimise the risk of overheating ~~and any adverse contribution to the urban heat island effect~~;
2. Development must address the impacts of the urban heat island effect;
3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and
5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.



13 Climate Resilience

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 2oc and 6oc 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 100c 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 thie 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.

MM60 13.1.4 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.

13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.

13 Climate Resilience

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:

   a. solar shading to prevent solar gain, particularly on glazed facades;

   b. urban greening to improve evaporative cooling;

   c. passive ventilation and heat recovery;

   d. use of thermal mass to moderate temperature fluctuations;

   e. minimal reliance on energy intensive cooling systems.

MM61 2. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm. ~~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

AM79 cope better with changing climate patterns. Building design, including orientation, materiality, building servicing and greening can manage heat risk and address the urban heat island effect. 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

MM62 13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future. ~~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 Climate Resilience

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.

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Table 3: Flood risk vulnerability classifications relevant to the City Source: Relevant uses from Planning Practice Guidance (Flood Risk and Coastal Change)

Essential Infrastructure	▪ Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. ▪ 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
Highly Vulnerable	▪ Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. ▪ Emergency dispersal points. ▪ Basement dwellings. ▪ Installations requiring hazardous substances consent.
More Vulnerable	▪ Hospitals ▪ Residential institutions such as care homes and hostels. ▪ Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. ▪ Non-residential uses for health services, nurseries and educational establishments. ▪ Sites used for waste management facilities for hazardous waste.
Less Vulnerable	▪ 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. ▪ Police, ambulance and fire stations which are not required to be operational during flooding. ▪ Waste treatment (except hazardous waste facilities).
Water-compatible development	▪ Flood control infrastructure. ▪ Sewage transmission infrastructure and pumping stations ▪ Docks, marinas and wharves. ▪ Navigation facilities. ▪ Water-based recreation (excluding sleeping accommodation). ▪ Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

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.

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Table 4: Suitability of different uses in flood zones
Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

Flood Risk 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	✗	Exception ✓ Test required	✓	✓
EA Zone 3b	Exception Test required	✗	✗	✗	✓
SFRA Surface water/sewer flood risk areas	Exception Test required	✗	Exception Test required	✓	✓

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 positive pump devices or similar on plumbing to prevent sewer surcharge within the building.

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13.3.8 Flood resilience measures make clean up after a flood more efficient, and include:

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- 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.

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.

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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.

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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.



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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~~ plan and City of London Riverside Strategy recognises the need for the raising of flood defences by up to 0.5m by 2050 and ~~1m~~ a further 0.5m 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 an appropriate and adequate minimum 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 in line with TE2100 requirements. Riparian owners are responsible for the maintenance ~~and enhancement~~ of flood defences.

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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:

   a. 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;

   b. Co-operating with WPAs within and beyond London to plan for suitable facilities for the City's waste;

   c. Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste; and

   d. 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 It will continue to work with the GLA, the Environment Agency and other waste planning authorities to improve waste planning, including where any surplus capacity is identified. The City Corporation will monitor waste movements to waste locations outside London and share the data with the GLA regularly. ~~and will work with the GLA and the Environment Agency to improve waste planning.~~ AM84

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.

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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.



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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

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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 the Thames Estuary Partnership 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 and with Network Rail for any potential movement by rail.

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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.

13 Climate Resilience

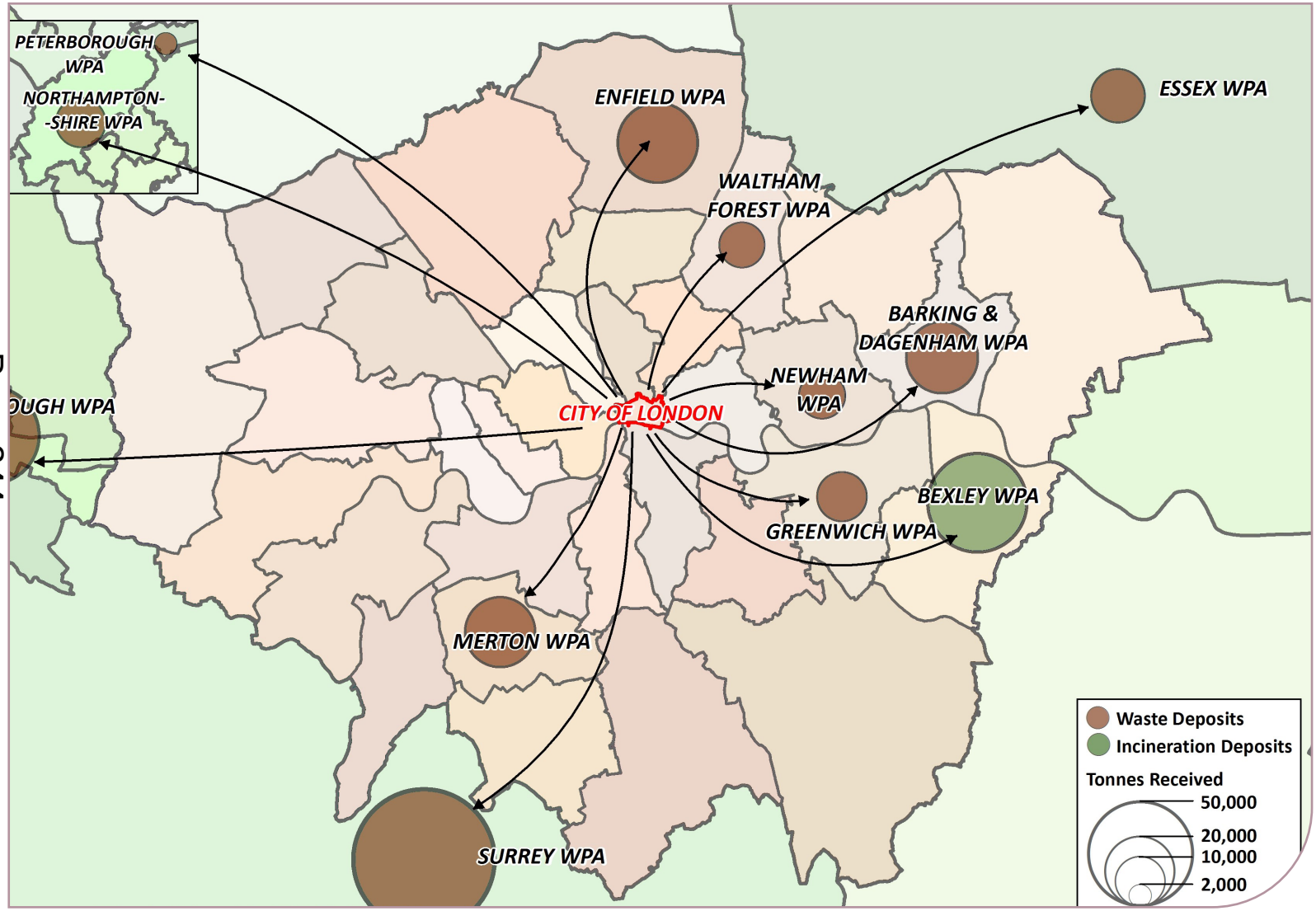


Figure 19: Waste deposit locations 2021

13 Climate Resilience

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:

    a. the development will handle waste which has been generated locally;

    b. 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;

    c. 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

    d. 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 & the Key Areas of Change



14 The Temple, the Thames Policy Area & the Key Areas of Change

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

AM87 for ~~barristers~~ to support the Bar and maintain the Temple area. 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.

AM88 Within the Temple, ~~adjustments~~ changes of use 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.



14 The Temple, the Thames Policy Area & the Key Areas of Change

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. Temple Church makes a significant contribution to the history and character of the Temple. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

AM89

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 The Temple, the Thames Policy Area & the Key Areas of Change

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:
    a. protecting and enhancing permanent public access and river views along the Riverside Walk;
    b. improving access to the River Thames by enhancing north-south routes and the widening of the Riverside Walk;
    c. maximising opportunities for public open space along the riverfront and seeking public realm improvements and increased permeability to the north of the Riverside Walk;
    d. improving the vibrancy of the riverside by requiring new development to provide active frontages where appropriate;
    e. encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value; and
    f. 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:
    a. safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
    b. encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
    c. 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;
    d. refusing development on or over the River Thames, except for structures that specifically require a waterside location for river-related uses;
    e. resisting the permanent mooring of vessels; and
    f. 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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

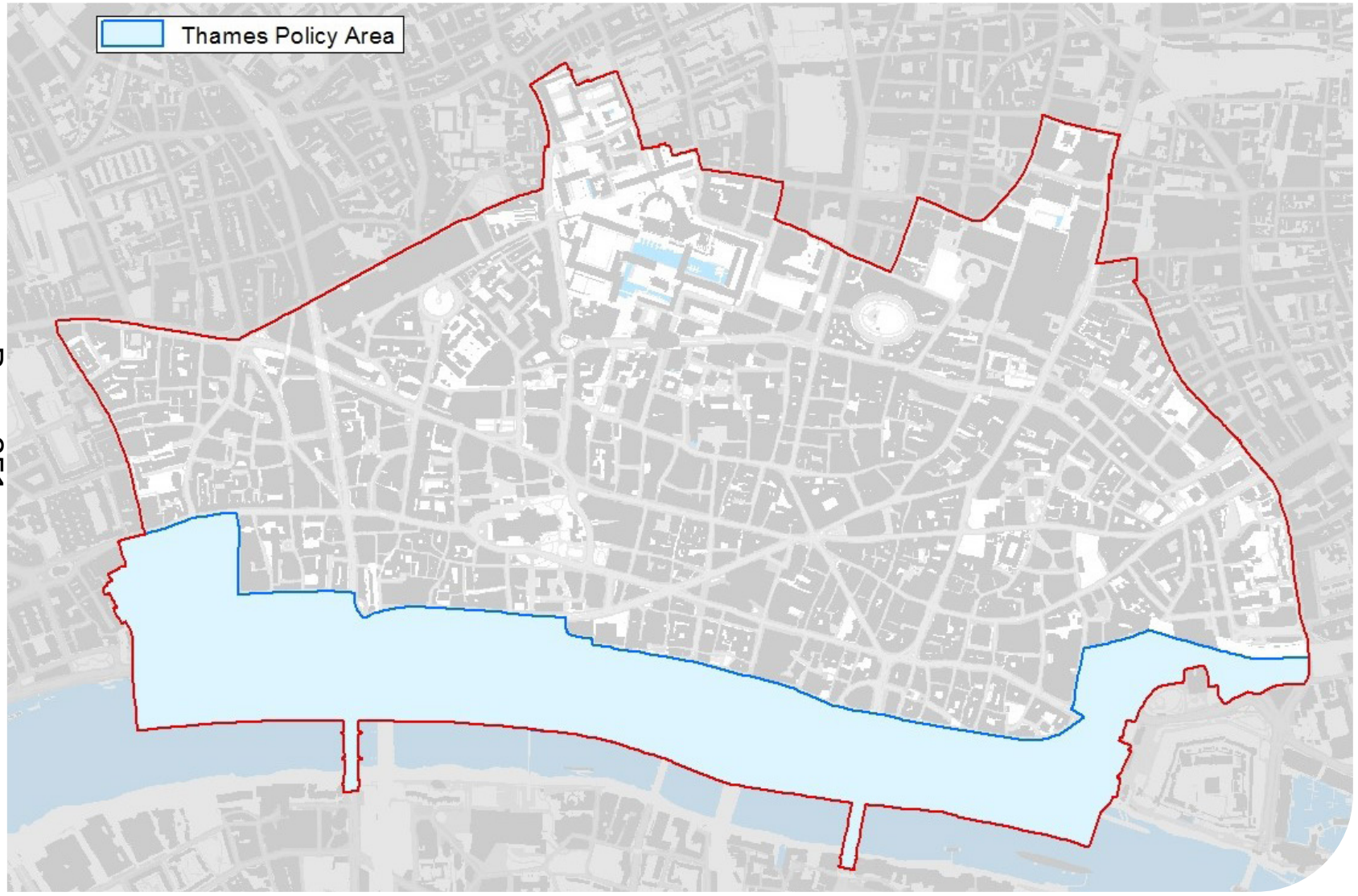


Figure 20: Thames Policy Area

14 The Temple, the Thames Policy Area & the Key Areas of Change

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 Thames Estuary Partnership, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

AM90

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.



14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

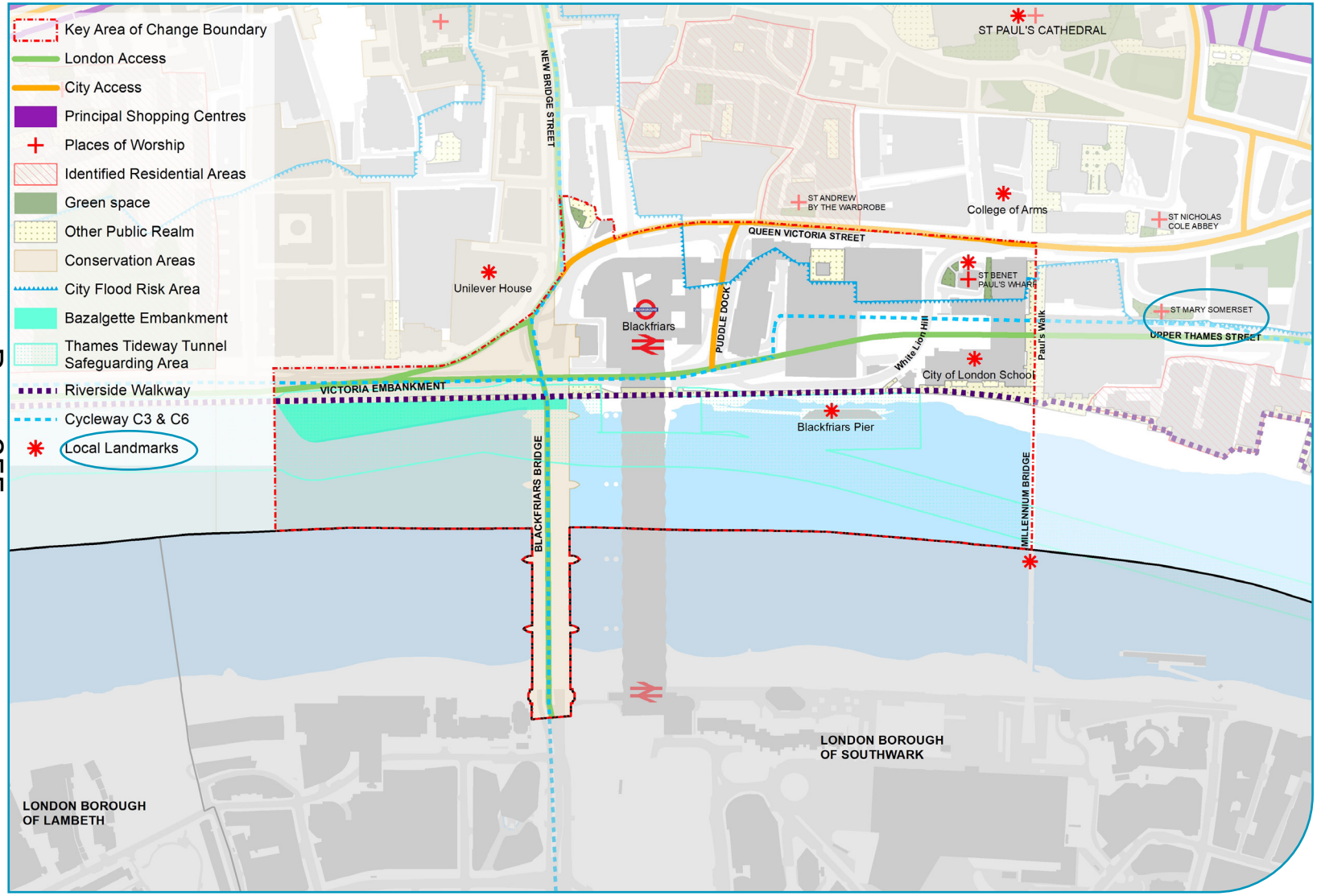


Figure 21: Blackfriars existing context

AM92 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches:

St Mary Somerset, Upper Thames Street (S18 Blackfriars)

AM86 Amendment to Figures 21 and 22 to update the City Flood Risk Area as per latest Environment Agency data.

14 The Temple, the Thames Policy Area & the Key Areas of Change

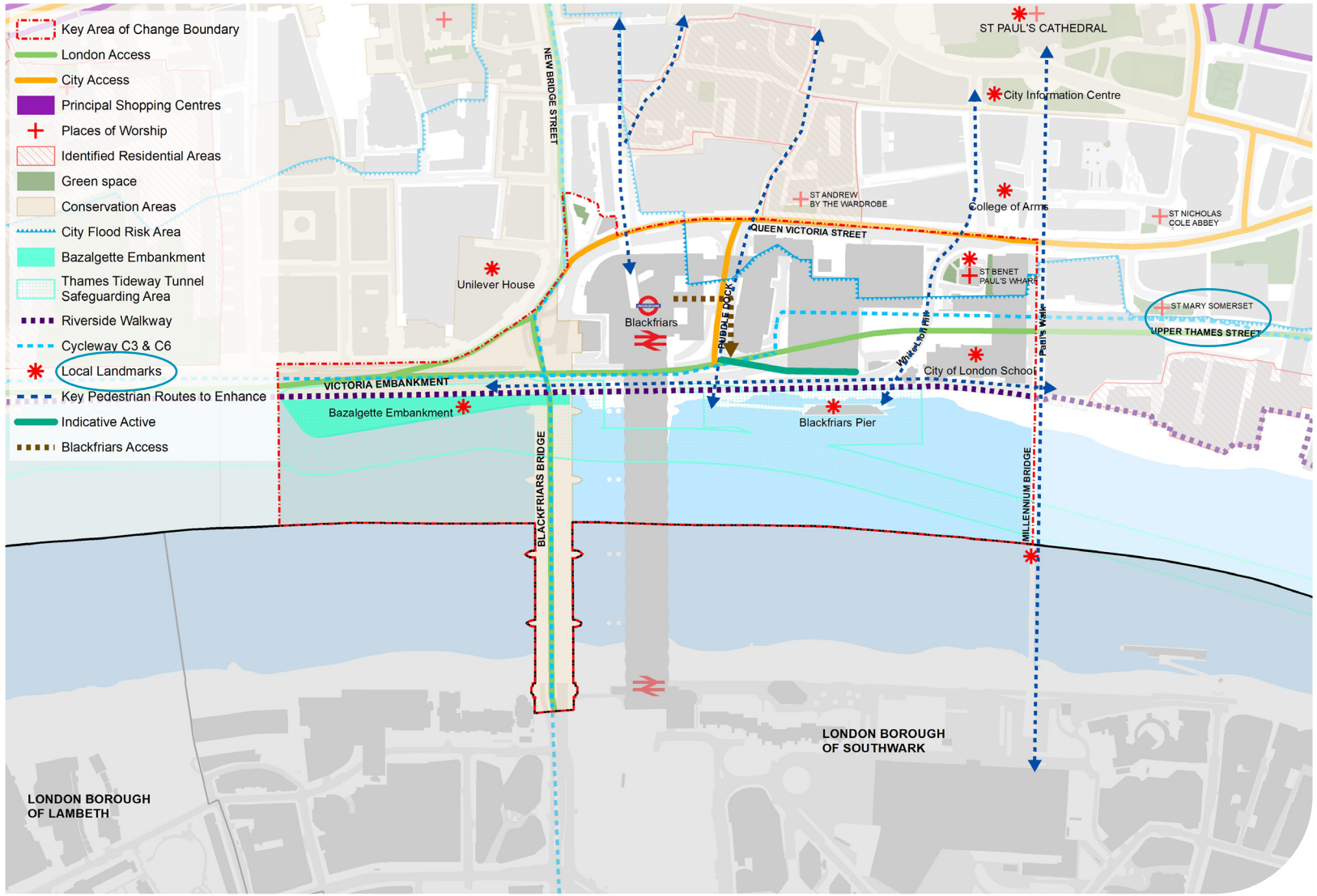


Figure 22: Blackfriars Spatial Priorities

AM92 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches:

St Mary Somerset, Upper Thames Street (S18 Blackfriars)

AM86 Amendment to Figures 21 and 22 to update the City Flood Risk Area as per latest Environment Agency data.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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:
    a. improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
    b. improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;
    c. improving signage to and from the Pool of London to the Tower of London;
    d. improving the servicing of buildings, encouraging the development of shared servicing bays and access points and collaborative management; and
    e. preventing vehicular access onto the Riverside Walk and removing car parking areas upon redevelopment.

14 The Temple, the Thames Policy Area & the Key Areas of Change

9. Enhancing public realm and public spaces by:

   a. 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;

   b. identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and buildings on redevelopment; and

   c. maximizing opportunities from development to create additional inclusive public space and play facilities.



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 The Temple, the Thames Policy Area & the Key Areas of Change

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

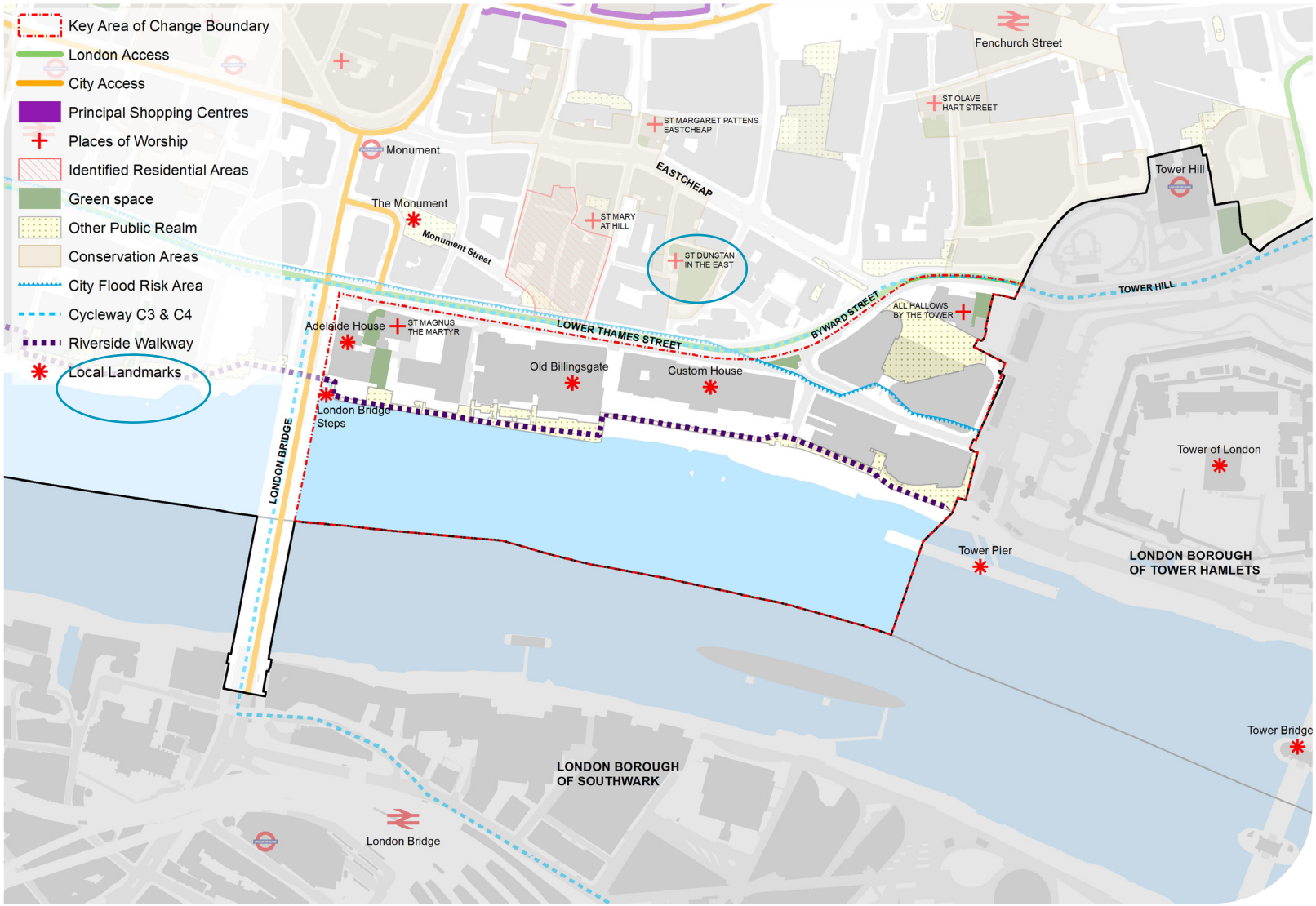


Figure 23: Pool of London Existing Context

AM92 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches: St Dunstan-in-the-East, St Dunstan's Hill (S19 Pool of London)

14 The Temple, the Thames Policy Area & the Key Areas of Change

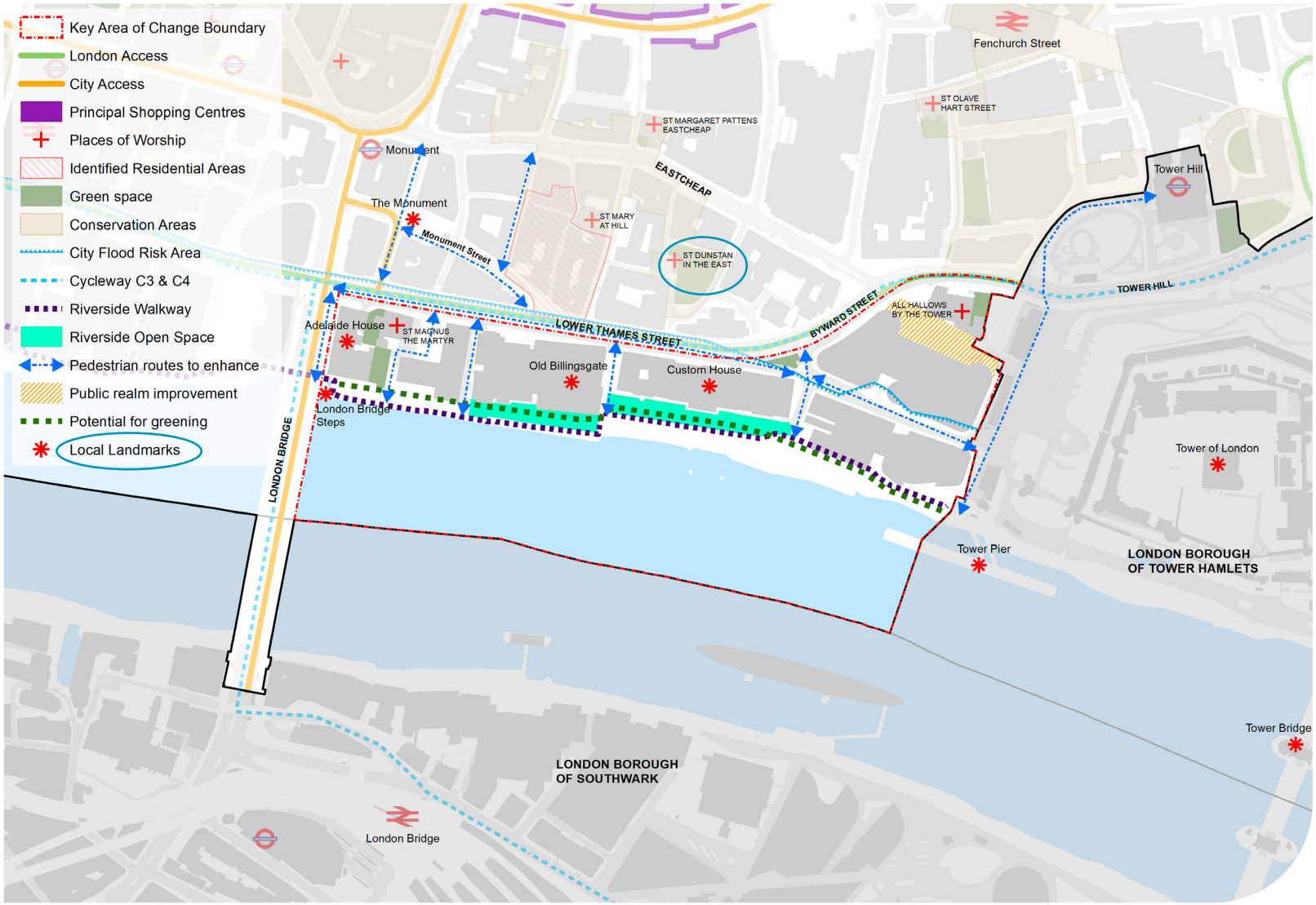


Figure 24: Pool of London Spatial Priorities

AM92 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches: St Dunstan-in-the-East, St Dunstan's Hill (S19 Pool of London)

14 The Temple, the Thames Policy Area & the Key Areas of Change

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:

    a. maximise training, education and employment opportunities for residents;

    b. maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;

    c. create additional publicly accessible open and green space and additional accessible play space for children;

    d. encourage local retail facilities; and



14 The Temple, the Thames Policy Area & the Key Areas of Change

e. 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:

   a. 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;

   b. encouraging cultural events, arts and play in public spaces;

   c. permitting additional hotels on appropriate sites; and

   d. managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.

4. Improving transport connections and pedestrian connectivity by:

   a. implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;

   b. 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;

   c. sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;

   d. encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate and between Minories and Mansell Street;

   e. improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;

   f. enhancing links to the riverside walkway and the Tower of London; and

   g. 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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

AM91 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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

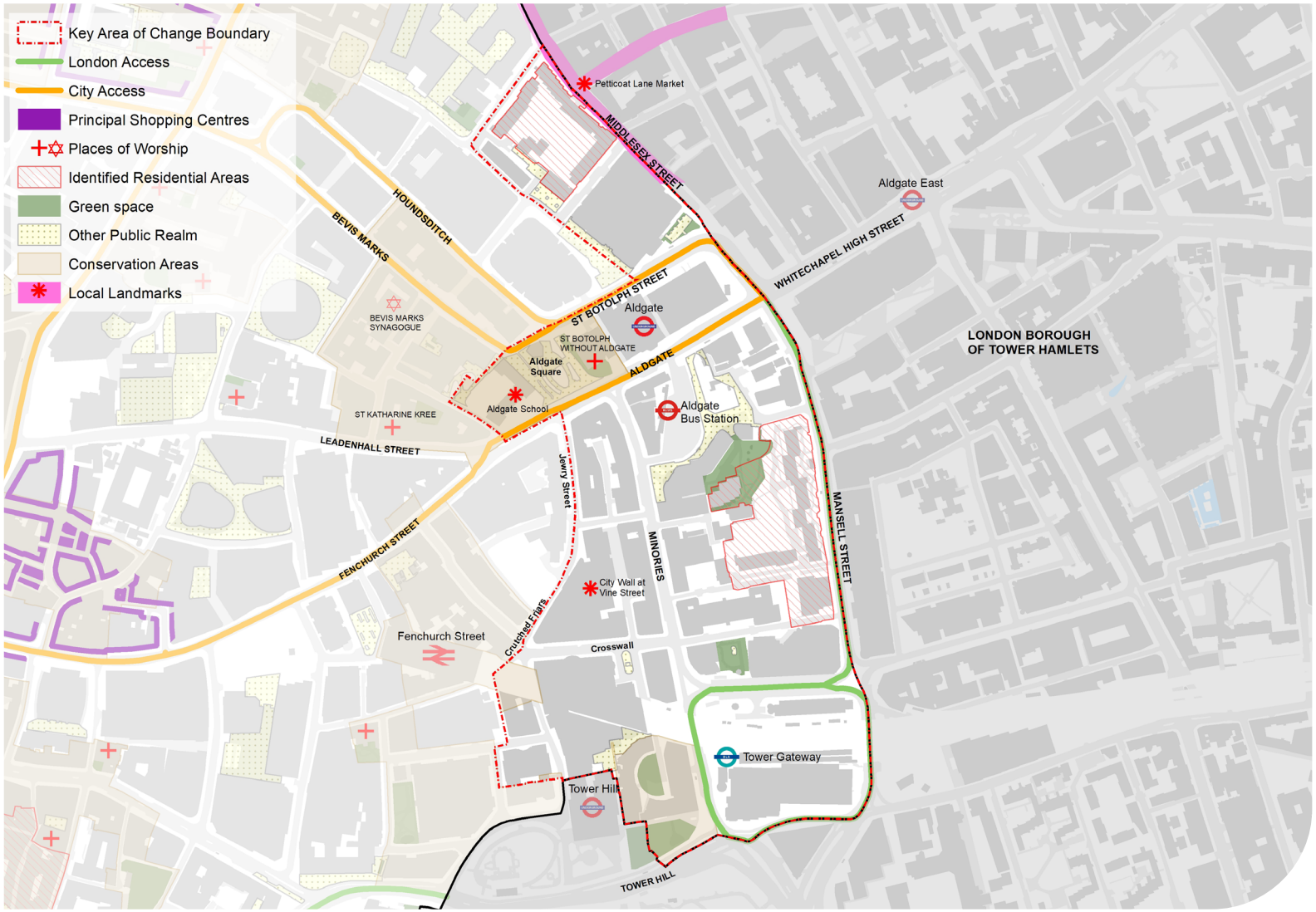


Figure 25: Aldgate, Tower and Portsoken existing conditions

14 The Temple, the Thames Policy Area & the Key Areas of Change

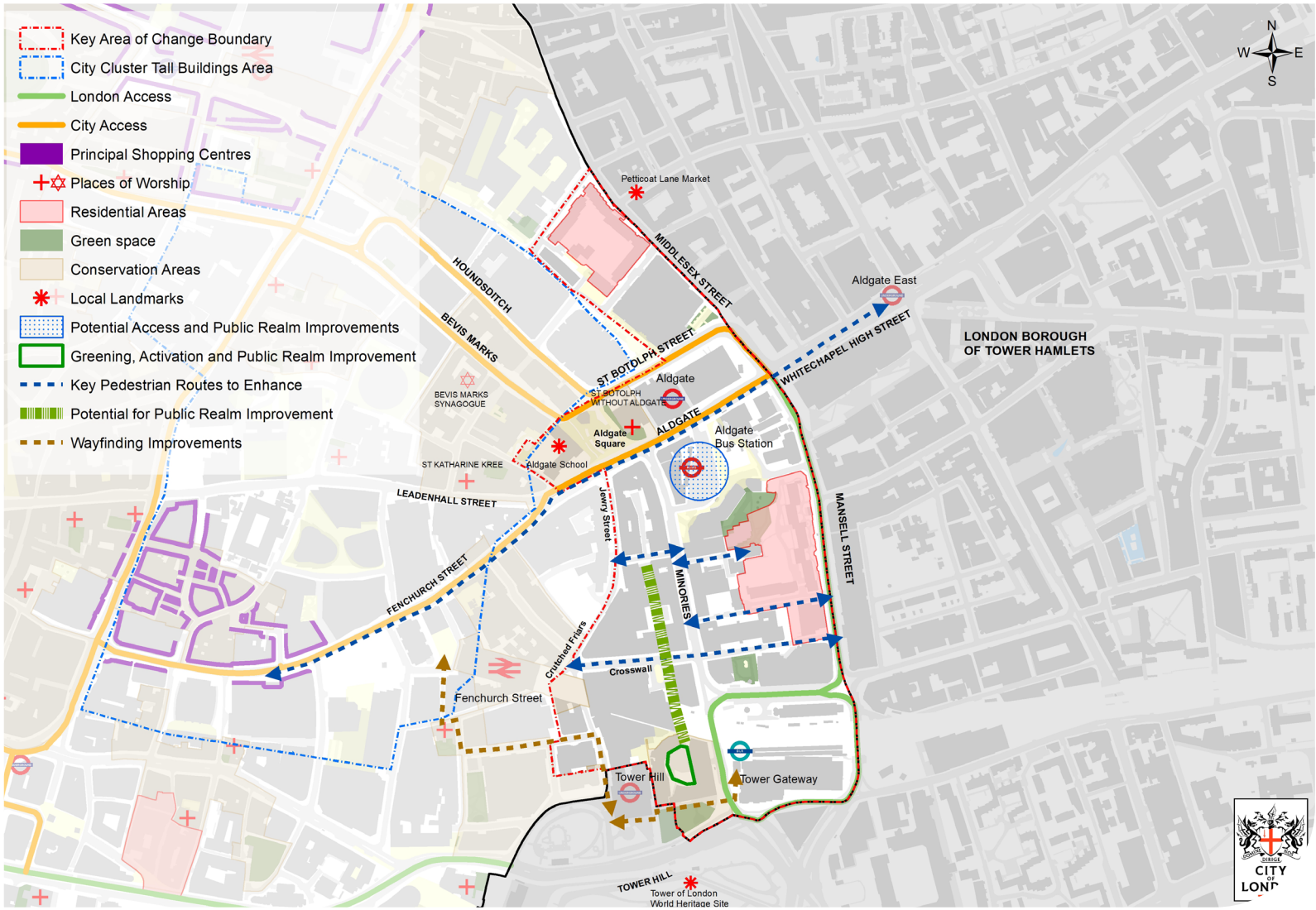


Figure 26: Aldgate, Tower and Portsoken Spatial Priorities

14 The Temple, the Thames Policy Area & the Key Areas of Change

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;

MM63

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.



14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

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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 delivery 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.



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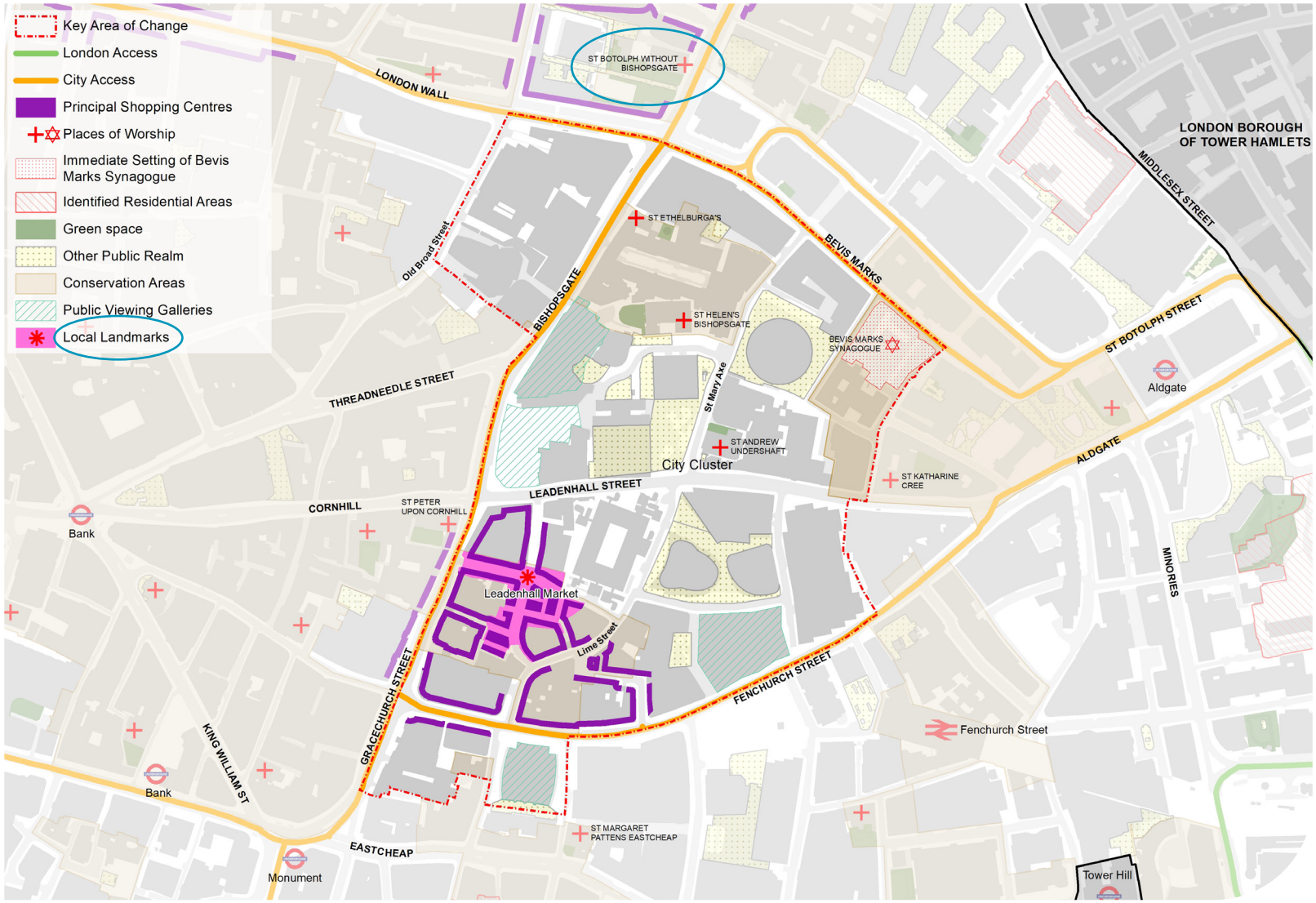
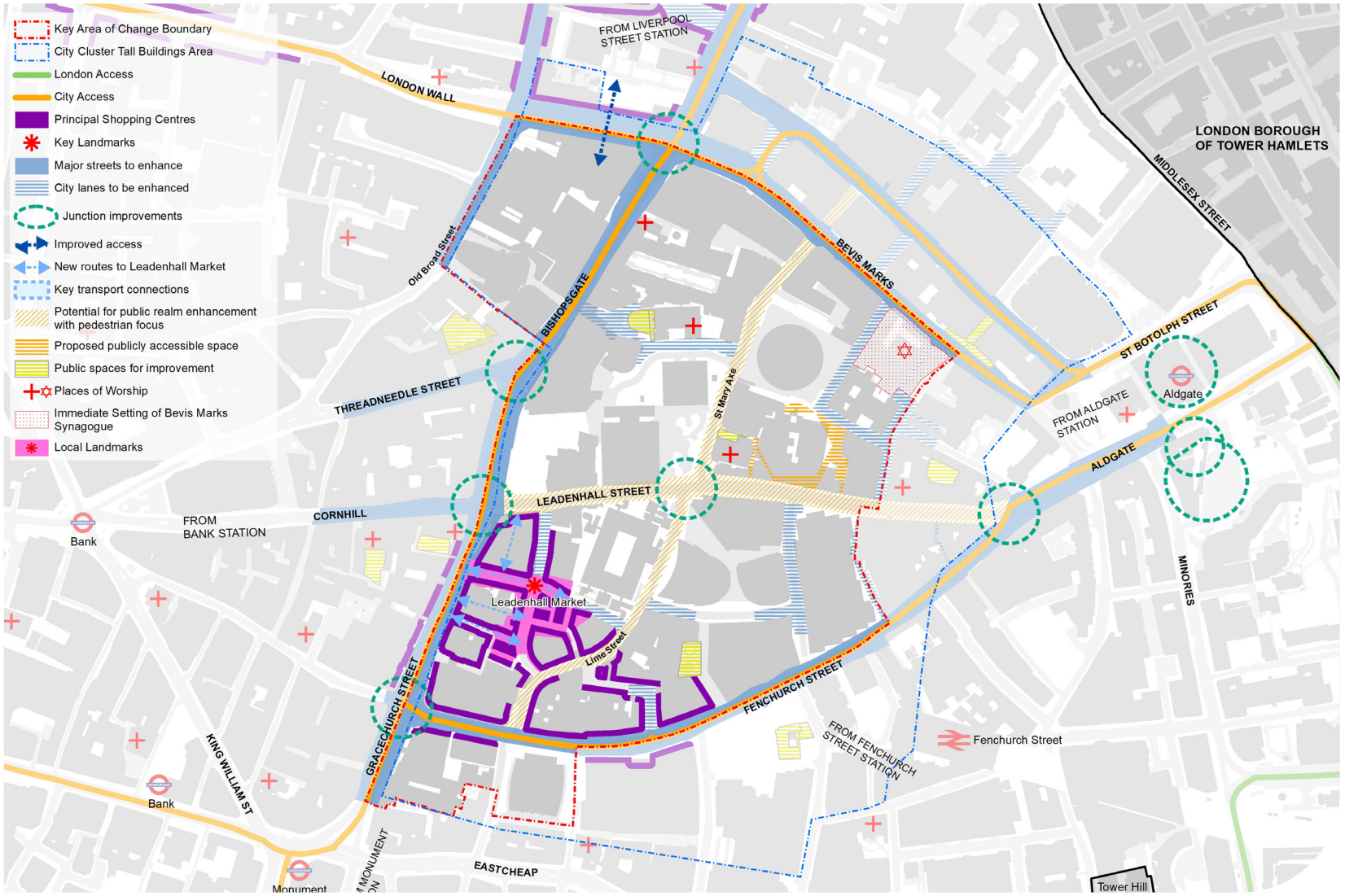


Figure 27: City Cluster existing conditions

AM93 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches: St Botolph without Bishopsgate (S21 City Cluster)

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Figure 28: City Cluster Spatial Priorities

AM93 make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches:

St Botolph without Bishopsgate (S21 City Cluster)

14 The Temple, the Thames Policy Area & the Key Areas of Change

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:
    a. 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;
    b. 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;
    c. enhancing the immediate setting of St. Paul's Cathedral through high quality development and public realm enhancements; and
    d. delivering additional greening on streets and open spaces and encouraging the greening of buildings, where compatible with heritage considerations.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.

AM94

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.



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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

14 The Temple, the Thames Policy Area & the Key Areas of Change

enhance the public realm and to priortise 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.



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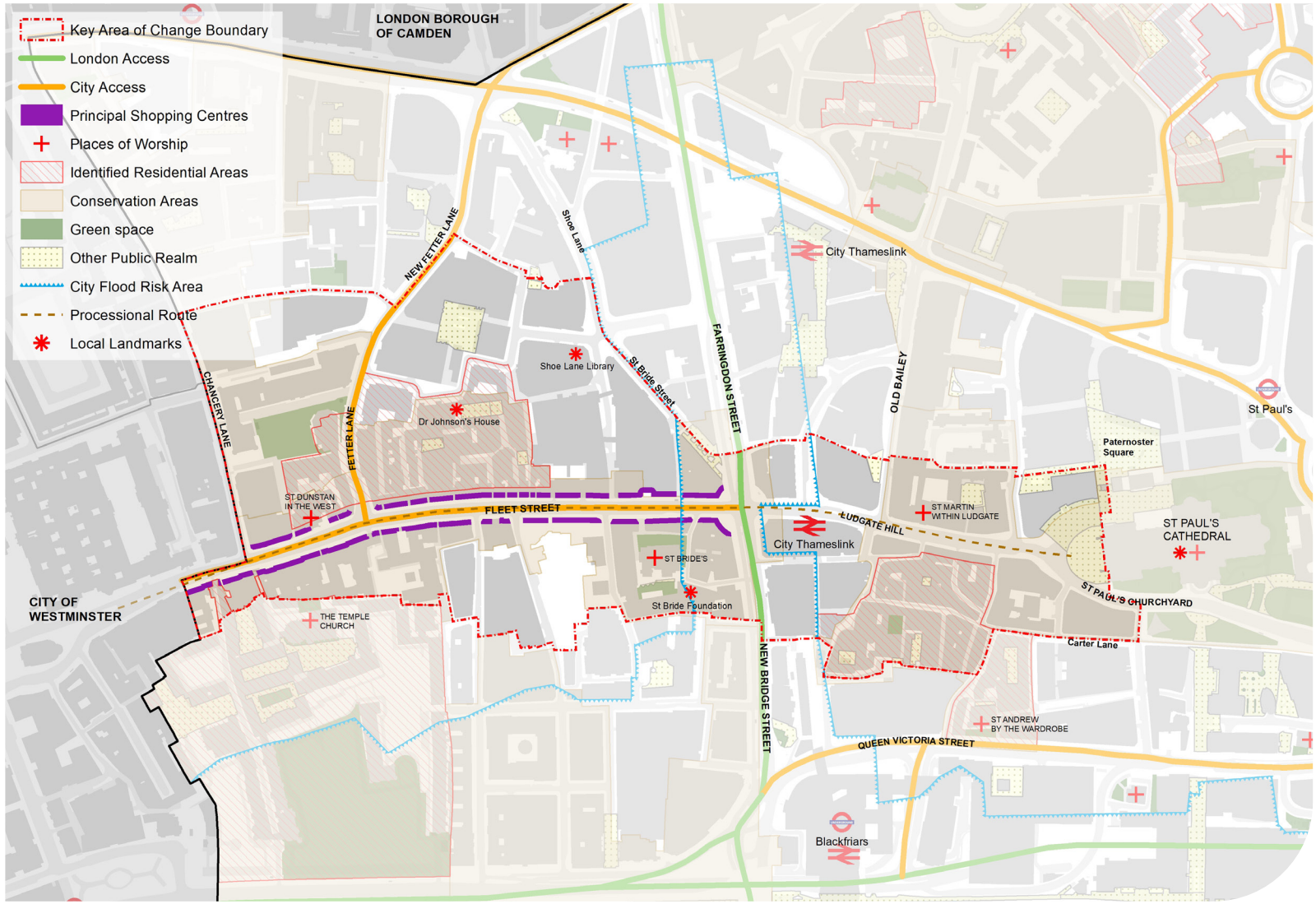


Figure 29: Fleet Street and Ludgate existing conditions

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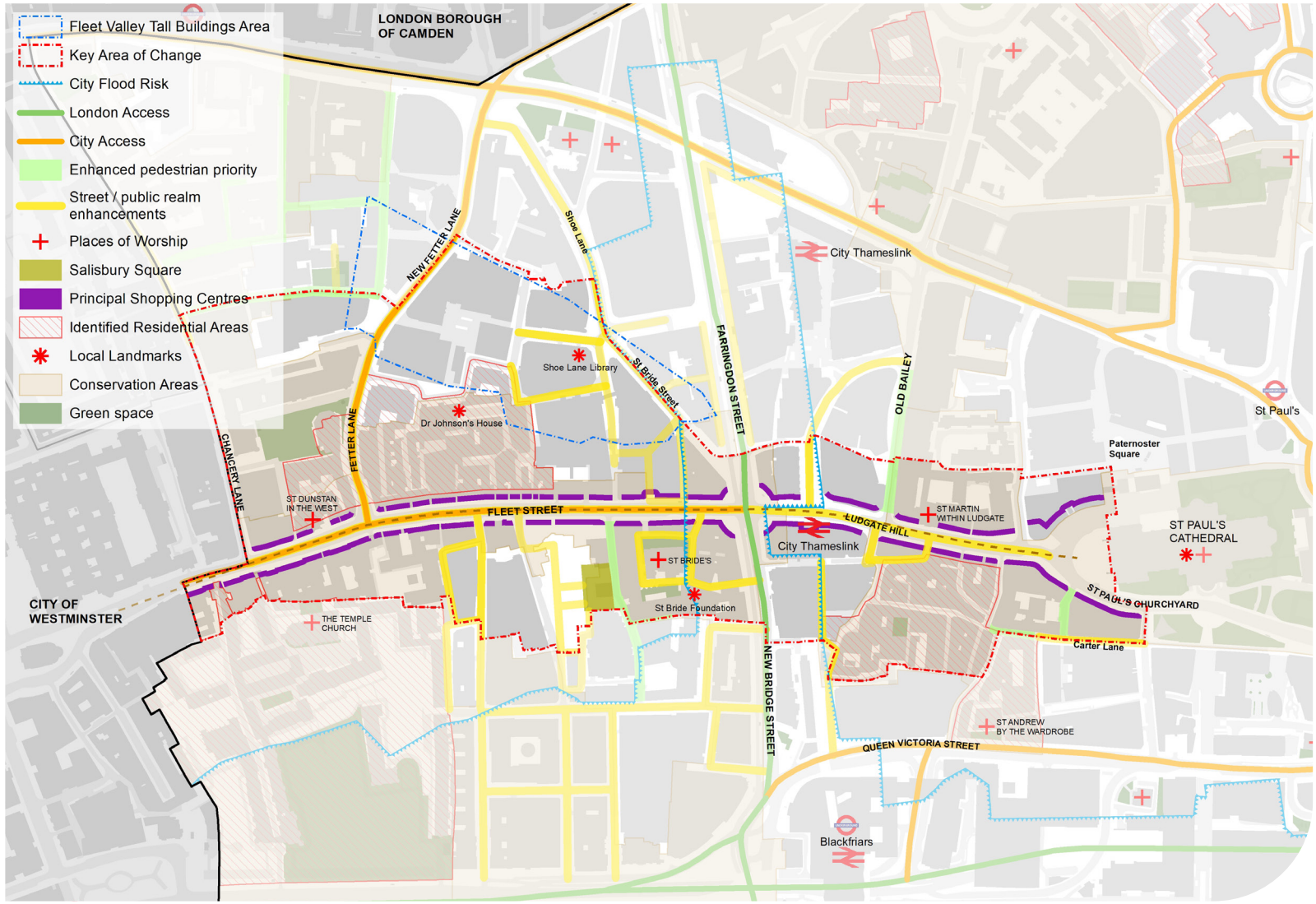


Figure 30: Fleet Street and Ludgate Spatial Priorities

14 The Temple, the Thames Policy Area & the Key Areas of Change

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;

AM95

2. Ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, and enhancements to wayfinding, legibility and accessibility in the Barbican area 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;

AM97

8. Requiring improvements to pedestrian and cycle routes for all within and through the north of the City including through improvements to wayfinding;

AM96

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;

AM98

11. Encouraging a diverse leisure, retail, food and beverage offer, particularly along Long Lane ~~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;

MM64

14. 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.

14 The Temple, the Thames Policy Area & the Key Areas of Change



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 The Temple, the Thames Policy Area & the Key Areas of Change

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. The Forum is in the process of preparing a Neighbourhood Plan for the designated neighbourhood area.

AM99

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 and will work closely with the Culture Mile BID to deliver public realm and cultural activation.

AM100

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.

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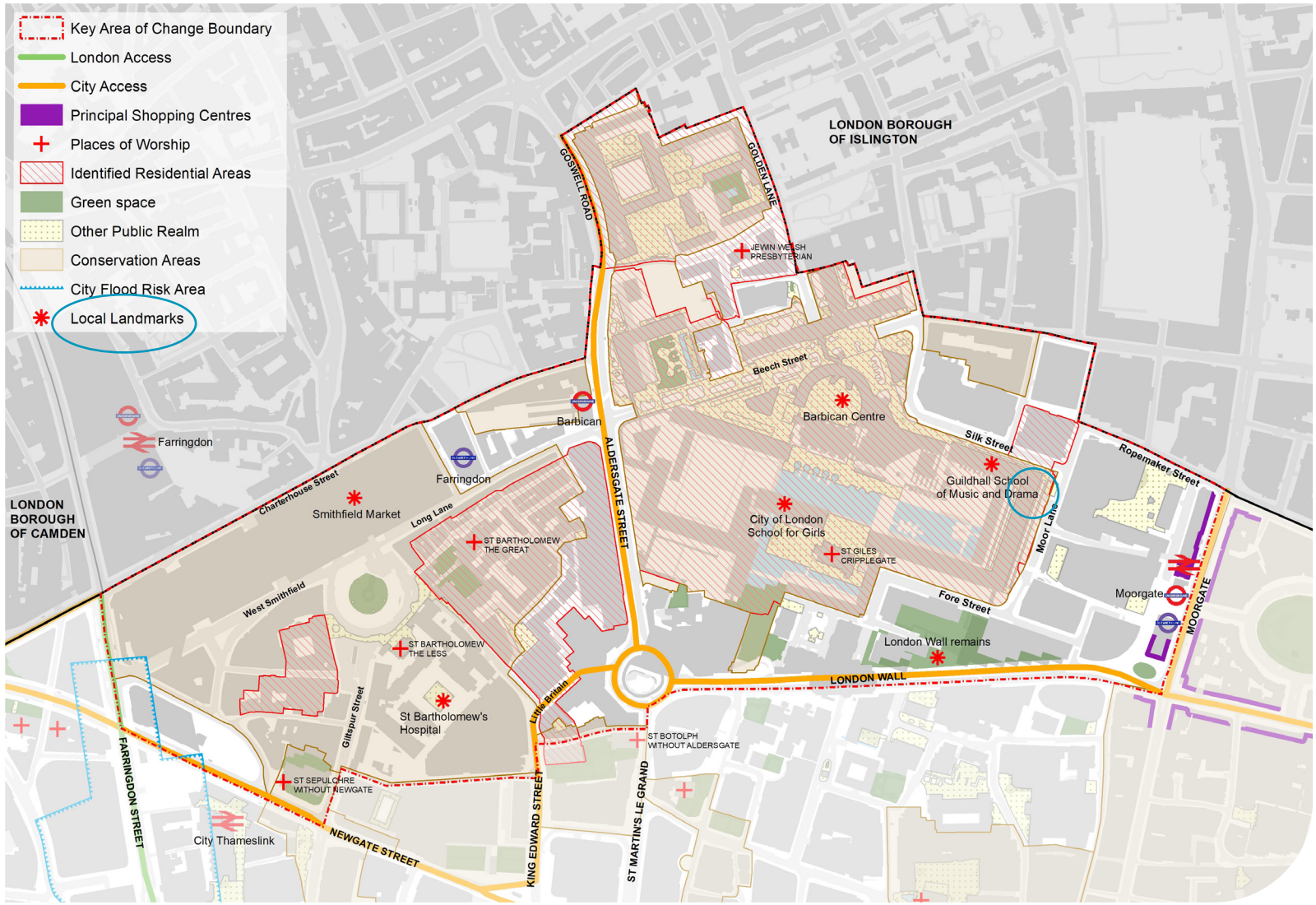


Figure 31: Smithfield and Barbican existing conditions

AM101 Error correction in location of open space on Moor Lane

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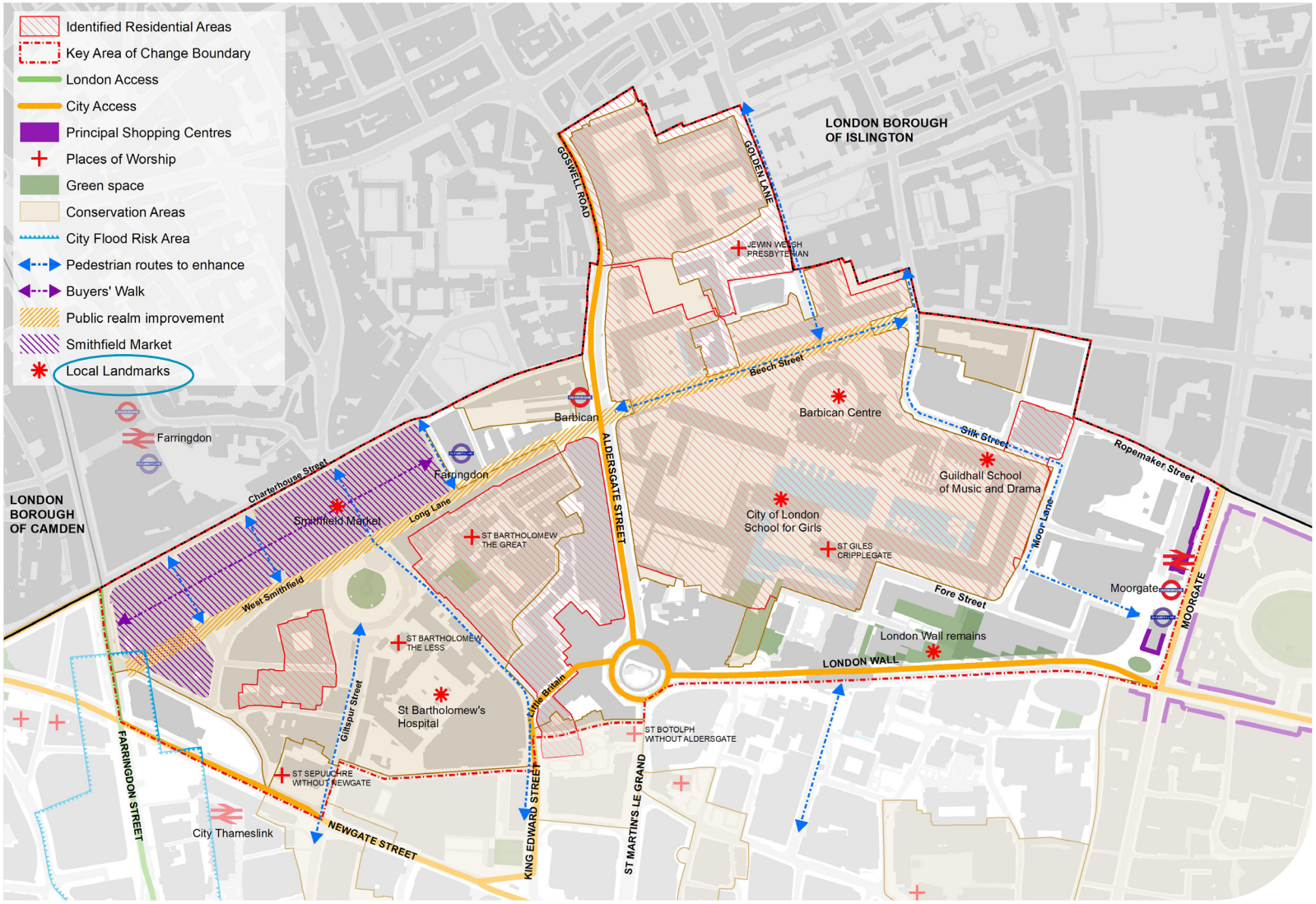


Figure 32: Smithfield and Barbican Spatial Priorities

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Strategic Policy S24: Smithfield

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 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 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;

MM65

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.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.



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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;

AM102

10. ~~Improving~~ Transforming the overall user experience permeability and supporting improvements to the accessibility and capacity of Liverpool Street Station, and its surroundings in support of its role as a key element of national infrastructure and gateway to the City of London and driver of economic growth, 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.

MM66

12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.

14 The Temple, the Thames Policy Area & the Key Areas of Change

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.



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MM67 Impact of development on local views, heritage assets and the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.

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.



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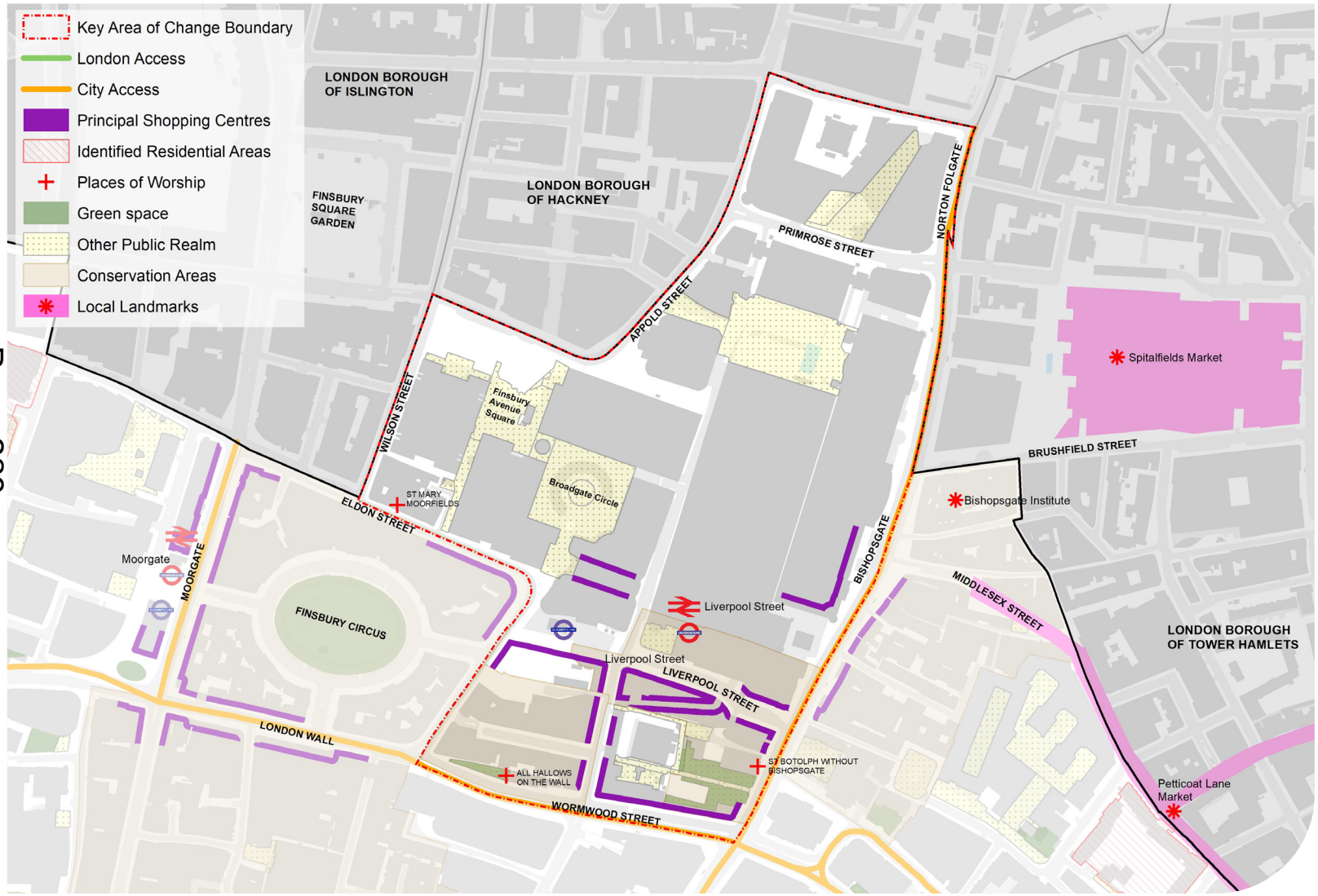


Figure 33: Liverpool Street existing conditions

14 The Temple, the Thames Policy Area & the Key Areas of Change

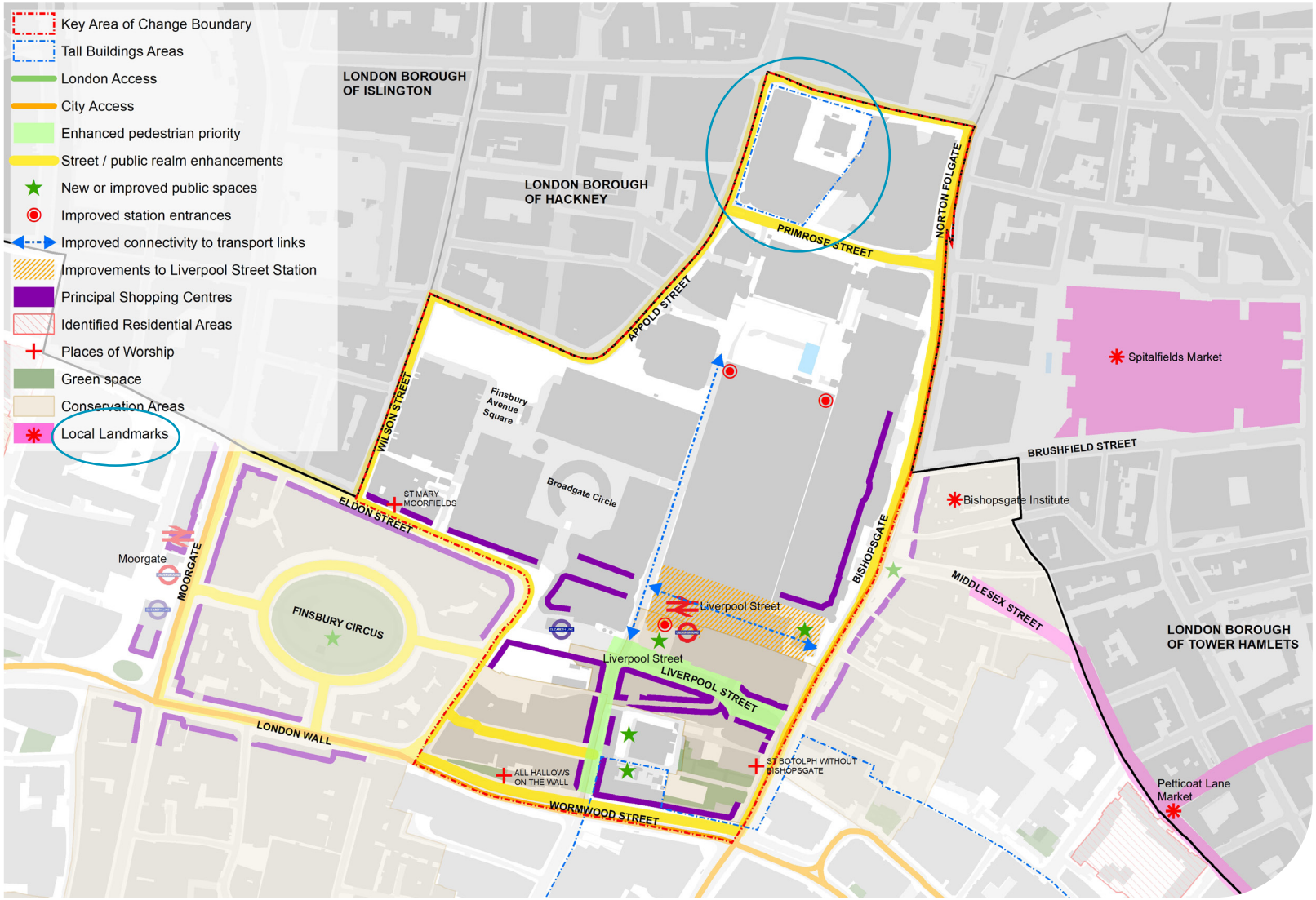


Figure 34: Liverpool Street Spatial Priorities

AM103 Add the Broadgate Tall Building Site

15 Implementation



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 Implementation

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:

   a. assist in the delivery of the infrastructure necessary to support implementation of the City Plan and the City's Transport Strategy; and

   b. contribute towards the costs of Crossrail, or other strategic infrastructure, in accordance with the provisions of the Mayor of London Community Infrastructure Levy 2.

MM68 2. Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.

3. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:

   a. site specific mitigation meeting statutory tests;

   b. affordable housing;

   c. training, skills and job brokerage;

   d. carbon offsetting;

   e. cultural provision;

   f. Highways and public realm enhancements including commuted sums for maintenance;

   g. local procurement in the City and neighbouring boroughs; and

   h. measures to enhance area-wide security, where appropriate.

4. Use of the Vacant Building Credit is not considered to be appropriate in the City of London.



15 Implementation

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 will be assessed on a site-by-site basis, in liaison with the City of London Police, particularly within and in close proximity to ~~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.

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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 Implementation

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.



15 Implementation

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 Implementation

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 Implementation

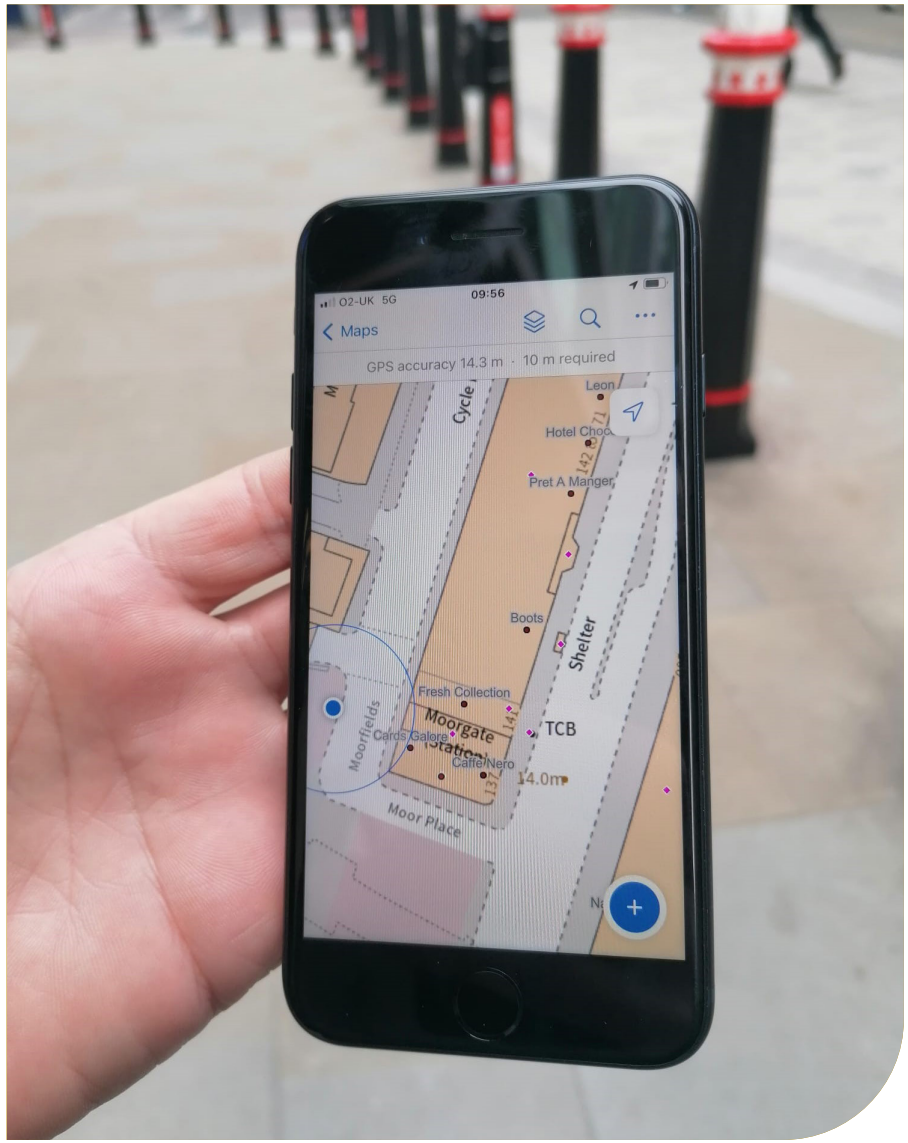
Monitoring

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.



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Appendicies



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Appendicies

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.

Appendices

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City Plan 2040 Appendix 2

The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.

*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40

Year	Target* per annum	Units	Status
2025/26	146	41	Completions (projected)
2026/27	146	97	Completions (projected)
2027/28	146	580	Completions (projected)
2028/29	146	342	Completions (projected)
2029/30	102	0	Completions (projected)
2030/31	102	120	Completions (windfalls)
2031/32	102	120	Completions (windfalls)
2032/33	102	120	Completions (windfalls)
2033/34	102	120	Completions (windfalls)
2034/35	102	120	Completions (windfalls)
2035/36	102	120	Completions (windfalls)
2036/37	102	120	Completions (windfalls)
2037/38	102	120	Completions (windfalls)
2038/39	102	190	Completions (windfalls and capacity)
2039/40	102	220	Completions (windfalls and capacity)
Total	**1,706**	**2,430**	

Glossary



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.

Glossary

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.

Biodiversity Metric

The statutory Biodiversity Metric (BM) is used to calculate the pre-development and post-development biodiversity value of the development's onsite habitat, as well as the biodiversity value for offsite biodiversity gains and biodiversity credits. It uses habitat information to generate "biodiversity units", a proxy measure for biodiversity value. The statutory BM data value inputs include habitat type, size, distinctiveness, condition, and its location in the local area.

Glossary

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.

Glossary

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City Landmarks

- Cannon Street Station (towers)
- Central Criminal Court (dome), Old Bailey
- Guildhall (roof and flêche), Guildhall Yard
- Former Port of London Authority Building (tower), 10 Trinity Square
- Royal Exchange (Tower)
- Great Arthur House, Golden Lane Estate
- Barbican Towers

Strategic Landmarks within the City

- St Paul's Cathedral
- The Monument

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.

Glossary

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.

Glossary

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.

Glossary

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.

Glossary

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.

Mitigation Hierarchy

A concept used to manage biodiversity impacts, with four steps: Avoidance, Minimisation, Restoration, Offsetting.

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.

Glossary

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Neighbourhood Forum

A group which has been designated under the neighbourhood planning process for a specific designated neighbourhood area. A neighbourhood forum has the ability to prepare a Neighbourhood Plan. It is a statutory consultee on planning applications and depending on the status of the Neighbourhood Plan, will be consulted on the allocation of a proportion of Neighbourhood CIL receipts for applications permitted within its area.

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.

Glossary

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 transhipment 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.

Glossary

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.

Glossary

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, Queen Elizabeth 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).

Glossary

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.

Glossary

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 10oC 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 recyclate sorting and bulking but does not include waste transfer.

Glossary

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.

AM10 **Wider Environmental Sustainability benefits**

Measures related to minimising carbon emissions or improving climate resilience that make a significant contribution towards the wider environmental sustainability of the City, going beyond what would otherwise be expected.

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.