



Local Plans Sub (Planning and Transportation) Committee

Date: FRIDAY, 17 MAY 2019

Time: 11.00 am

Venue: COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

Members: Deputy Alastair Moss (Chairman)
Christopher Hayward (Deputy Chairman)
Randall Anderson
Deputy Keith Bottomley
Deputy Jamie Ingham Clark
Shravan Joshi
Graham Packham
William Upton, QC

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Lunch will be served in the Guildhall Club at 1.00pm
NB: Part of this meeting could be the subject of audio visual recording

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To agree the public minutes of the meeting held on 6 March 2019.

For Decision
(Pages 1 - 10)
4. **CITY OF LONDON LOCAL PLAN REVIEW: REPORT ON PUBLIC CONSULTATION, KEY ISSUES RAISED AND PROPOSED NEXT STEPS**
Report of the Director of the Built Environment.

For Decision
(Pages 11 - 28)
5. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE **Wednesday, 6 March 2019**

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Room - 2nd Floor West Wing, Guildhall on
Wednesday, 6 March 2019 at 10.00 am

Present

Members:

Christopher Hayward (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Randall Anderson
Mark Bostock
Deputy Keith Bottomley
Marianne Fredericks
Alderman Gregory Jones QC
Dhruv Patel OBE

Officers:

Gemma Stokley	- Town Clerk's Department
Bruce McVean	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Alanna Coombes	- Department of the Built Environment
Thomas Parker	- Department of the Built Environment
Isaac Taylor	- Department of the Built Environment
Averil Pittaway	- Department of the Built Environment

1. APOLOGIES

There were no apologies.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. MINUTES

The public minutes and summary of the meeting held on 9 October 2018 were considered and approved as a correct record.

MATTERS ARISING

Facilities for Public Cycle Parking (page 5) – A Member referred to the comments made around this at the last meeting and the fact that e-bikes would require Wi-fi signal access. She went on to state that there were many Wi-Fi blackspots within the City – some around the Guildhall complex – and added that the new development at 120 Fenchurch Street had also impacted on Wi-Fi access for some mobile phone users. She questioned what Officers and developers were doing to address this. Officers undertook to raise this matter with Strategic Infrastructure colleagues in the City Surveyors Department and seek a response.

4. **UPDATE ON THE LOCAL PLAN CONSULTATION**

The Assistant Director (Planning & Policy) provided Members with a verbal update on the Local Plan consultation.

Members were informed that the Plan had been out for consultation from November until February. All City residents had been contacted regarding the Plan and emails had been sent to over 500 recipients on the Department's mailing list. Members were informed that 175 responses to the consultation had been received to date which, whilst lower than anticipated, was approximately double the number of responses received for previous consultations. Officers reported that, whilst the CPA had around 150 members, they had chosen to submit a single, collective response.

Members were informed that the Local Plan had received lots of press and social media coverage since the launch of the consultation period. Officers reported that key issues that had emerged so far indicated that there was strong support for 'greening' in the City and for efforts around managing intensification in the City Cluster. Concerns around the protection of views of St Paul's and the Tower of London had also emerged as key. Developers had expressed concerns around the cumulative impact of the City's policies.

Officers tabled details of the City Plan Drop-In Sessions that had taken place throughout the consultation process as well as Stakeholder and public meetings. It was reported that this Committee would be tasked with looking at the responses received in greater detail in due course. The Assistant Director (Planning & Policy) highlighted the Youth Engagement Event that had taken place. He reported that the group involved had been aged 17-24 years and that there had been 38 participants. He reported that the group had been very engaged and tabled an evaluation report compiled from the feedback, outcomes and learning from the youth consultation event.

A Member stated that he was currently acting as Chairman for the Partnership of Young London, a London-wide youth group, and suggested that Officers could also engaged on the Local Plan here if it was thought to be of some use. He applauded their efforts in actively engaging young people in this consultation. It was noted that the CPA also had a 'next generation' body that might be useful in terms of future youth engagement efforts.

The Assistant Director (Planning & Policy) stated that, interestingly, the event had revealed that the group were sceptical of the Cultural Mile, the new Centre for Music and the need to relocate the Museum of London. They stated that they felt unengaged with these proposals. Members highlighted that part of the issue here could be a generational divide in terms of the definition of culture. It was recognised that the City could and should do more to address these concerns - for instance around the wider promotion, inclusiveness, affordability and accessibility of all of its cultural offerings. It was suggested that this be fed back to the Cultural Mile Director.

The Chairman reported that it was proposed that the Local Plan be brought back to this Committee in greater detail in May and asked that the Town Clerk

identify a suitable date for this meeting alongside relevant Officers. It was noted that a new Chairman and Sub Committee membership would have been established by this stage.

A Member referred to the concerns raised by the industry in relation to the cumulative impact of the City's policies and suggested that it might therefore be necessary to prioritise these.

Another Member picked up on comments that suggested that City residents had expressed the view that they felt marginalised and asked for further information on this. The Assistant Director (Planning & Policy) stated that these comments had originated, in the main part, from Barbican and Golden Lane residents around the fact that they felt that the City was prioritising business needs. The Member commented that he hoped that the Local Plan would help to establish clear residential zones where amenities would be highlighted. In response to further questions, the Assistant Director (Planning & Policy) confirmed that the Barbican Residents Association had submitted a response to the consultation.

The Chairman recognised that many residents (of which there were approximately 8,000 in the City) were strongly of the view that they were not recognised as stakeholders in planning terms. He added that some recent planning applications, particularly those where the City Corporation had been the developer, had, unfortunately, created a strained relationship with residents.

A Member stated that he had hoped to see better engagement from residents in general but added that it was important to note that those responses received suggested that residents were generally happier with the new draft Plan than with the existing version.

The Deputy Chairman stated that he would expect these kinds of views to be voiced more strongly from those based in smaller residential pockets within the City which, it could be argued, were more disadvantaged in terms of having a voice/amenity protection than those in the larger residential areas. It was noted that work around the Cultural Mile had managed to successfully bring together both businesses and residents for a common purpose and that this was something that should be promoted and built upon by the Local Plan.

Members were keen to increase the narrative that the more business there was in the City, the more the City would continue to thrive which would ultimately be of benefit to all, including City residents.

RESOLVED – That Members note the initial headlines from the Local Plan Consultation and that this would be considered in greater detail at their next meeting on a date to be confirmed in May 2018.

5. **TRANSPORT STRATEGY – UPDATE POST-CONSULTATION**

The Committee considered a report of the Director of the Department of the Built Environment providing an update following consultation on the draft Transport Strategy.

The Committee focused discussion around the six key issues raised during the consultation:

Concerns over congestion and air quality impacts of delivering the Strategy

Officers reported that comments received from both residents and organisations had recognised that the Strategy would result in reduced capacity for vehicles in the City which would lead to more congestion and, in turn, impact on air quality. It was reported that no changes to the Strategy were proposed as result of these concerns due to the fact that proposals around this needed to be considered in the round, alongside ambitions to reduce emissions from motor vehicles and reducing general motor traffic and the number of freight vehicles on the City's roads.

The Deputy Chairman stressed the need to push the narrative that the Transport Strategy was focused on prioritising people, safety, sensible speed limits and cycling over concerns around congestion.

In response to a question regarding whether there was any evidence to back up the concerns expressed around air quality, Officers stated that there was not and that these seemed to be based primarily on perception at present.

Members suggested that this should be tracked into the Air Quality Strategy with those expressing concerns as part of this consultation invited to contribute to the Air Quality Strategy consultation too. Officers confirmed that there would be cross reference between the two strategies.

A Member suggested that vehicles utilising the river also needed to be considered in terms of air quality as they often tended to be amongst the most polluting. This would be particularly important as the City continued to promote and encourage more travel by river.

Members went on to discuss the overlap of responsibilities between the Planning and Transportation and Port Health and Environmental Services Committees regarding air quality. It was noted that air quality matters were reported to both Committees and that a PHES representative had also recently been appointed to serve on the Streets and Walkways Sub (Planning and Transportation) Committee. Members stressed the need for Officers to be clear on which Committee would be actioning various air quality matters going forward so that there was no ambiguity or disjointedness around this.

Concerns over access impacts of delivering the Strategy

Officer highlighted the consultation summary document which detailed average scores received from respondents to the consultation and suggested that those with limited mobility had tended to score the proposals lower than other groups. Members were informed that text within the Strategy had been updated to clarify that proposals around pedestrian priority in places did not necessarily mean pedestrianisation. Necessary access for both people and goods would be considered through project delivery.

One Member commented that this was a key concern from his point of view. He went on to refer to the experience of one of his constituents with limited mobility who commuted in to London Bridge station by train but then relied upon taxis to take him to London Liverpool Street to get to his place of work. He and other constituents had expressed concern around the impact of increased congestion on those who relied upon taxis to make these kinds of journeys due to limited mobility. He therefore stressed the need for greater flexibility here.

Officers reassured Members that definitions of essential traffic included people who needed to use taxis/private taxis to travel due to mobility problems. It was hoped that moves to reduce general traffic would mean that those people could travel more quickly and reliably around the City. Officers reiterated that there was flexibility to look at this on a project by project basis and that each project would be subject to DDA.

Officers went on to stress that the City Corporation were keen to introduce a standard in terms of accessible streets.

A Member suggested that the wording around maintaining appropriate vehicle access be amended to highlight that this was a commitment as opposed to an intention. Members were supportive of this change which Officers undertook to make in the final version of the document. The Member went on to question what were defined as 'essential vehicles'. Officers clarified that essential traffic included buses, freight and services with a destination within the Square Mile, cyclists, taxis and private taxis.

A Member underlined that there would need to be a trade-off, in some circumstances, between personal need and the greater good. She highlighted that this would also require additional focus on the joining up of transport links and bus routes across the City. She added that Bow Lane was now pedestrianised until 6pm with no major impact in terms of travel and that the City was quite compact in terms of getting from one location to another. It was, however, recognised that there were individuals with genuine needs in terms of reduced mobility and that the opportunity for them to travel throughout the City should not be denied.

The Deputy Chairman referred to the Mayor of London's views on taxis but noted that essential taxi use was a different matter and should therefore be considered separately.

It was noted that the younger generation tended to utilise public transport more frequently to travel around the City and the point was made once again that the more convenient and reliable such transport was the more people would opt for this.

Requests to increase the pace of delivery:

Members were informed that these requests related specifically to the cycle network, impact on air quality and the reduction in motor traffic. Officers emphasised that the milestones quoted within the strategy were delivery by

dates and that some elements may therefore be delivered ahead of these dates – this would be made clearer within the final document. It was noted that some elements would be delivered in 2019 and 2020.

The delivery of the second phase of the cycle network would be brought forward to 2035 which was felt realistic at this stage. Officers that they were, however, reluctant to commit to faster timescales in other areas beyond what was already stated within the Strategy.

The Chairman stated that it was important to inform people that this was very much a live document looking to drive policy change in these important areas.

A Member questioned what factors were driving the timing around the various different areas. Officers responded that one factor was funding. He added that some proposals were also dependent on delivery in other areas too. For example, in order to meet the standards set around reductions in motor traffic, certain traffic measures would need to be delivered first in order to reduce traffic to 'safe and comfortable' levels. The Member stated that it would be useful to include this narrative and some explanation around timescales where possible.

A Member commented that resourcing would also impact upon delivery in matters such as electric vehicle charging points. She therefore questioned whether Officers had begun to ringfence any funds or flag up likely costs at this stage. Officers reported that the Department of the Built Environment were currently undertaking an exercise to prioritise DBE projects which took into account the Transport Strategy. It was intended that there would be a rolling, three-year, programme coming forward.

Officers concluded by stating that the Delivery Plan for the Strategy would be a separate document.

The treatment of Taxis in the Strategy:

Officers highlighted that responses to the consultation had highlighted that taxis wished to be treated differently to private cars and private hire vehicles. The point that taxis were a door to door, fully accessible mode of transport was acknowledged. Officers highlighted that taxis represented approximately one fifth of vehicles on the City's streets and that taxi access would be considered on a project by project basis. No changes to the Strategy were therefore proposed in response to the comments received here.

Members were of the view that the fact that the strategy defined taxis being used by people with access needs as essential traffic was key and should be sufficiently emphasised.

It was noted that the Mayor of London's view of taxis was not generally favourable and that this was very much a London-wide issue. However, it was agreed that their use in the City should be championed if they were assisting those with access needs. It was also noted that taxis were subject to more

intensive regulation than mini cabs meaning that there were distinctions between the two both legally and traditionally.

Officers reiterated that this would be addressed at project level and added that the distinction between taxis and other private hire vehicles was increasingly blurred from a user point of view.

Members recognised that future technological developments may enable cars carrying someone with a recognised disability or access need to be identified and given access to areas that other motor vehicles were not.

The treatment of motorcycles and mopeds in the Strategy:

Officers reported that there had been strong lobbying from motorcycle groups requiring that motorcycles and mopeds be exempt from future access restrictions and road user charges, including emissions related charges. They also suggest that the Strategy should seek to encourage greater use of motorcycles and mopeds to travel around the City.

As with taxi access, it was decided that this should be considered on a case by case basis with no changes to the Strategy proposed in response to the comments received.

It was noted that the responses to the proposals from those travelling on motorcycle or moped within the City were generally less positive when compared to those using other modes of transport.

Officers reported that further work around what prompted such a strong response (generated from a motorcycle action group) was required. A better understanding of why people chose to travel by motorcycle/moped in the City was also needed.

It was noted that electric motorcycle/moped technology was quickly emerging and that the City should look at what it might do to encourage use of such vehicles with the installation of electric charging points and other relevant infrastructure.

The use of motorcycles/mopeds and road safety was also discussed with Members commenting that they often saw users speeding in certain areas of the City and precariously skipping traffic queues. Members went on to discuss courier drivers utilising motorcycles/mopeds and commented that many of these were often driving on provisional licences with no experience of the roads.

Officers confirmed that motorcycle/moped users were termed as 'vulnerable road users' and were over represented in statistics regarding injuries on the road. Whilst there were no statistics to indicate the number of courier drivers using these vehicles on provisional licences only, the assumption was that this was very common. Work around limiting the length of time that such drivers could operate on a provisional licence only was currently underway. TfL were

also looking at the matter with the Road Danger Reduction Team and companies such as Deliveroo.

Members were extremely concerned that this was a legal loophole that was currently being exploited and asked that Officers explore with the Remembrancer whether it might be possible to lobby Government on the matter alongside other boroughs.

The Deputy Chairman reported that the concept of regulating the way that delivery drivers were paid (and thereby encouraging them to slow down) had been raised with TfL. Members agreed that it would be important to tackle the 'bigger picture' here.

Suggested removal of the Cycle Superhighway on Upper and Lower Thames Street:

Members were informed that over 500 people had submitted template responses via the 'Unblock the Embankment' website. No changes to the Strategy were proposed as a result of these responses. Members agreed with this view.

A Member commented that this was a well utilised, expensive piece of infrastructure.

A Member questioned the increasing use of motorised scooters and segways in the City on both pavements and roads. Officers reported that, at present, these were not legally permitted although it was noted that there was likely to be a push for legalisation here going forward. It was noted that this might therefore be worth noting as a specific point within the Strategy.

The Chairman reported that the final iteration of the Transport Strategy would be brought to the Planning and Transportation Committee in April 2019. He wished to thank, on behalf of the Sub-Committee, all of the Officers involved in producing the document which he described as an amazing, forward-thinking piece of work that had been incredibly well received.

6. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITEE

There were no questions.

7. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no additional, urgent items of business for consideration.

8. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No

9

Paragraph No(s)

3

9. **NON-PUBLIC MINUTES**

The non-public minutes of the meeting held on 9 October 2019 were considered and approved as a correct record.

10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions in the non-public session.

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no additional, urgent items of business for consideration in the non-public session.

The meeting ended at 11.28 am

Chairman

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Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 17/05/2019
Subject: City of London Local Plan Review: report on public consultation, key issues raised and proposed next steps	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Peter Shadbolt, Department of the Built Environment	

Summary

The draft City Plan 2036 was issued for public consultation during November 2018 to the end of February 2019. An extensive consultation exercise was undertaken, comprising mailouts, public meetings, drop-in sessions, meetings with various organisations and groups and use of social media. Copies of the draft Plan and consultation material were made widely available and an interactive summary placed on the Corporation's website. 181 responses, making 825 individual comments, were received, alongside notes from meetings.

The next stage in the preparation of the draft Plan is to agree revisions to the draft Plan which will then be published for a final stage of consultation likely to be in early 2020.

This report outlines the key issues that arose from the consultation for Members' discussion. A series of further meetings of the Sub-Committee will be programmed to consider the proposed changes and full text of the Plan.

Recommendation(s)

Members are recommended to:

- Note the results of the consultation on the draft Plan.
- Give their views on the key issues raised in the consultation outlined in this report and Appendix 1.
- Advise on how the Sub-Committee would like to undertake its further work in agreeing revisions to the Plan.

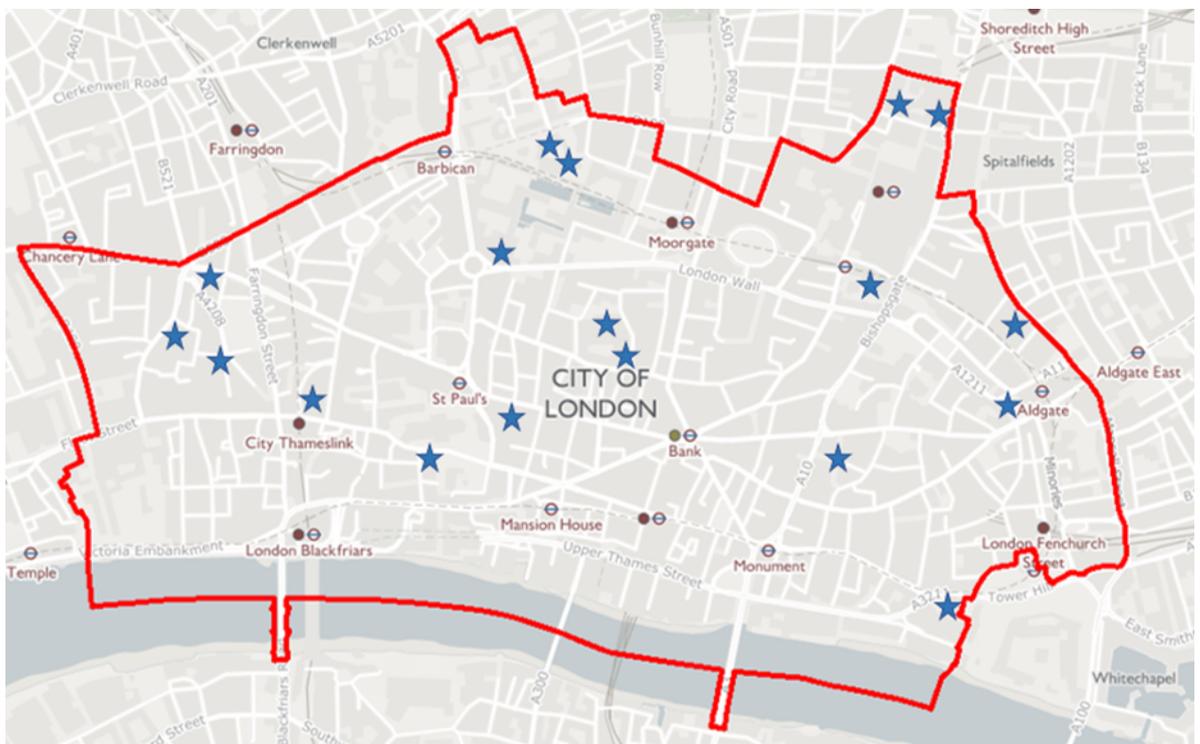
Main Report

Background

1. At its meeting on 30 October 2018, the Planning & Transportation Committee approved the draft Local Plan for public consultation. This followed careful consideration of the planning issues facing the City and scrutiny of proposed policies through the Local Plan Sub-Committee during 2017 and 2018.

2. The draft Local Plan was published for consultation alongside the draft Transport Strategy on 12th November 2019, with the consultation period closing on 28th February 2019. An extensive and wide-ranging programme of engagement was undertaken, including:

- Email notification to 318 recipients on the Local Plan consultation database (the size of the database reduced considerably on the introduction of GDPR but is slowly increasing again. It now stands at 485);
- Letter to all City residential addresses;
- Email to approximately 4,600 businesses on the City Occupiers Database;
- Two stakeholder consultation events on 18/01/2019, attended by 62 people;
- A public consultation event on 28/01/2019, attended by 39 people;
- 21 drop-in sessions at venues across the City throughout the consultation period. Venues were chosen to engage with different communities, both geographically and in terms of the likely audience. Locations are shown on the map below:



Location of City Plan 2036 drop-in sessions

- Presentations to City organisations at 9 separate events, including the City Property Association, the Clean City Awards Scheme Forum, Bishopsgate Ward and Culture Mile Network;
- Attendance at Transport Strategy consultation events;
- Commissioning a targeted consultation event on 20/02/2019 attended by 38 young people between the ages of 17 and 25;
- Notifying City Corporation Members through the November 2018 Members' Briefing and City Corporation officers and Members through information on the City Corporation's intranet pages.

3. The draft Local Plan, summary leaflet, evidence base, Integrated Impact Assessment and an online comment form were posted on the City Corporation's website. An interactive summary of the Plan, a Story Map, was also made available on the website, which attracted significant interest and compliment.
4. The Local Plan, summary leaflet, postcards and posters were made available in City libraries and at the Built Environment Enquiries Desk throughout the consultation. The summary leaflet and postcards were available at public meetings, drop-in sessions and other meetings.
5. Throughout the consultation, officers worked closely with the City Corporation's Communications Team to ensure extensive media coverage, through press releases, interviews with the Chairman of the Planning & Transportation Committee, and the use of social media, particularly through postings on Twitter and Facebook.

Draft Plan Public Consultation Response

6. A total of 181 responses were received to the consultation, making a total of 825 individual comments. In addition, a range of comments made through public and stakeholder meetings and through a youth engagement workshop which are not recorded or attributed as individual comments but will be considered in making amendments to the Plan. Although the numbers were less than hoped, particularly given the extensive nature of the consultation and mailouts, the number of responses was more than twice that received at the same stage of preparation of the adopted Local Plan (80 responses). Regular liaison with colleagues in neighbouring boroughs shows a general difficulty in engaging the public on planning policy matters, principally due to the length and complexity of statutory planning documents.
7. A wide range of organisations commented on the draft Plan, including City landowners, developers and their agents, business occupiers, residents and amenity groups and organisations. Responses were also received from statutory agencies and bodies, including neighbouring boroughs and the Mayor of London/Transport for London.

Key Issues

8. Comments were received on all aspects of the draft Plan and there was no single, dominant theme. Numerically, most comments addressed:
 - Transport (vehicular transport, walking and cycling)
 - Design
 - Open spaces and green infrastructure
 - Healthy and inclusive City
 - Culture, Visitors and the Night-time Economy
9. Whilst comments were received on all seven Key Areas of Change, the majority related to the Smithfield and Barbican area and to the City Cluster.

10. The main points raised in these comments are set out below, with further detail in Appendix 1:

- Vision and Objectives: widespread support for the Plan's vision and objectives.
- Healthy and Inclusive City: there was support for the overarching themes and ambition to deliver healthier and more inclusive City. The inclusion of policies at the front of the Plan and priority given to this agenda was supported. There was particularly strong support for measures to address poor air quality and a number of suggestions for initiatives to deliver improvements.
- Urban greening: widespread support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity. There was some concern from developers about the feasibility and viability of providing more greening on buildings, as opposed to around buildings.
- Transport: a range of transport issues were raised, with themes very similar to those raised in the Transport Strategy consultation. Particular issues included freight deliveries, pedestrian permeability, provision for cyclists and whether the Plan's transport proposals were ambitious enough and/or deliverable.
- Tall buildings, protected views and heritage assets: concerns were raised about the impact of tall building development on the setting of the Tower of London and St Paul's Cathedral, including from the processional route along Fleet Street and Ludgate Hill. Questions were raised as to whether the policies are clear enough and consistent with policies in neighbouring boroughs. Questions were also raised about the quality of design.
- City Cluster: questions around how the City Corporation will manage further intensification of this area, particularly the impact on City streets of increased traffic and footfall, whether or not the area should be expanded to allow further tall buildings and whether the boundary of the Cluster should be clearly delineated in the Plan rather than having an indicative boundary.
- Culture Mile (Smithfield and Barbican Area): general support for the Culture Mile initiative and the wider policies proposed for the Smithfield and Barbican Area but concerns about the impact of proposed developments and activities on residential amenity. A number of comments received concerning the future of Smithfield Market, with an expectation that the Plan should provide clear guidance on potential future uses.

11. Other parts of the draft Plan received a lesser number of comments, reflecting a degree of support for the approach taken, but also raising questions that will need to be addressed in proposed changes. Amongst the other issues raised are:

- Whether the retail policies were flexible enough to respond to changing retail patterns and a desire for more independent shops.

- Support for requiring flexible office floorplates and the growth in office floorspace, but some comments suggesting a need for affordable workspace policies.
- Some concern from developers about the cumulative impact of the Local Plan policies on the viability and deliverability of development.
- Some concern about the evidence base to support policy, particularly in relation to tall buildings and the identification of the Key Areas of Change.
- A concern from some residents that the Plan retains a business focus to the detriment of residents.

Comments from the Mayor of London

12. To progress the Local Plan through public examination to adoption, the City Corporation will need to seek a formal Statement of Conformity with the London Plan from the Mayor of London. The Mayor's comments on the draft Plan are therefore particularly important. The Mayor welcomed a number of areas of the Plan, including the clear overarching strategic objectives and the role of the City in the Central Activities Zone. The Mayor considered that the Local Plan needed to take a more proactive approach in several strategic areas, including housing and office development, demonstrating that identified needs can be met over the plan period and providing more certainty and clarity for developers. In relation to the Key Areas of Change, the Mayor considered that work should be undertaken to identify potential development sites to establish whether the City Corporation can meet its housing target, whilst also delivering office growth. The Mayor welcomed the draft Plan's general approach to transport but considered that there should be more focus on the Healthy Streets approach with greater prioritisation of walking and cycling over motorised transport.

Preparation of Publication Draft Plan

13. Further meetings of the Sub-Committee will be required to consider proposed changes to the policies and text of the draft Local Plan. The Sub-Committee will be asked to consider proposed changes and recommend that the revised Plan be approved by the Grand Committee, Policy & Resources Committee and Court of Common Council for further public consultation and submission to the Secretary of State for examination.
14. The number and frequency of meetings will be informed by how the Sub-Committee wishes to proceed in terms of considering changes to the draft Plan. In developing the draft Plan, the Sub-Committee met on a number of occasions to consider a series of draft policies before a final meeting to approve the full draft Plan for consideration by the Grand Committee. If Members are happy to follow a similar approach, then officers suggest that a further 3 meetings are likely to be needed:
- July – to consider an outline of the main proposed changes, including any changes to the overall strategy, and receive an update on the supporting evidence base which underpins the Plan;
 - September – to consider a full schedule of additional changes to the Local Plan in response to the consultation;

- October – to consider the full revised plan for approval and recommendation to the Grand Committee.

15. The Sub-Committee is asked to advise how it wishes to proceed.

Next steps

16. Following consideration by the Sub-Committee, the revised draft Plan will need to be approved by the Grand Committee, Policy & Resources Committee and Court of Common Council for further statutory consultation and subsequent submission to the Secretary of State for public examination. The target dates for Committee approval are:

- Planning & Transportation Committee on 5/11/2019
- Policy & Resources Committee on 21/11/2019
- Court of Common Council on 5/12/2019

17. The next stage of consultation will take place in early 2020 and is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. There is very little opportunity for the City Corporation to make further changes to the Plan in response to such objections. Instead, the Plan and any comments received are examined by an independent inspector appointed by the Secretary of State. The inspector will subsequently issue a report on the examination, which may include recommended modifications to the Plan. Subject to the availability of an inspector, the examination hearing is likely to be held in early summer 2020, with adoption of the Plan later in 2020 or early 2021.

Corporate & Strategic Implications

18. The review of the Local Plan is informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The draft Plan provides a spatial planning framework to support the four key corporate capital projects, along with proposals to ensure a sufficient future supply of business space by extending the City's tall building cluster. The draft Plan aligns with the draft Transport Strategy.

Conclusion

19. The City of London Draft Local Plan was subject to public consultation between November 2018 and February 2019. 181 responses to the consultation were received, making 825 individual comments. Key issues that were raised in the responses included support for the overarching strategy and objectives, support for further urban greening, issues around transport, the impact of tall building development on the setting of the Tower of London and St Paul's Cathedral, questions about the management of further development and extension of the City Cluster and general support for Culture Mile initiatives, although some concern about impacts on amenity.

20. Further meetings of the Sub-Committee will be required to consider changes to the draft Plan before it is recommended to the Grand Committee, Policy & Resources Committee and Court of Common Council for approval. The draft Plan

will then be subject to further statutory consultation before the draft Plan and any comments are submitted to the Secretary of State for public examination.

Appendices

- Appendix 1 – Key Issues raised through public consultation

Background Papers

Report to Planning & Transportation Committee 30/10/2018: City of London Local Plan Review: Proposed Draft Plan

Peter Shadbolt

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Consultation Responses – Key Issues

Vision and Objectives

1. There was support for the vision and objectives of the draft Plan. The business community, in particular, supported the ambition for the City to retain its role as a world leading office and professional services centre.
2. A number of questions were raised, particularly from residents, about potential conflicts between the various ambitions in the draft Plan and how such conflicts would be addressed, for example reconciling aims to protect amenity and reduce pollution with encouraging increased vibrancy and activity. There was also a concern that the draft Plan does not explain how it will deliver 'outstanding environments' whilst continuing to deliver economic growth.
3. Within the general comments, there was support for the increased emphasis on urban greening, although there was some concern from businesses about the deliverability and viability of urban greening initiatives. This is considered further below.
4. Heritage organisations, in particular, were concerned about potential conflict between the aim of delivering further tall buildings in the City Cluster and the need to preserve the character of the historic City, particularly the impact of tall buildings on protected views.

Strategic Policy S1: Healthy and Inclusive City

5. This section of the draft Plan generated a number of comments from residents, workers, developers and businesses, which were broadly supportive of the aim of delivering a much healthier and inclusive City of London. There was support for the inclusion of this section as the first set of policies and the greater priority that has been given to this agenda in the draft Plan.
6. The requirement for developers to consider the health impacts of development were supported, with strong support from the Mayor for the requirement for Health Impact Assessments. The development industry, whilst supporting the principle, felt that some flexibility was required in how this is implemented. A particular concern was that the HUDU methodology suggested in the draft Plan was designed for residential development and may not be applicable to commercial development.
7. Whilst supporting the requirement to deliver healthy buildings, developers highlighted that a range of certification existed and that the draft Plan should not rely solely on the Well Building Standard.
8. Residents considered that greater emphasis should be given to protecting the amenity of residential areas the City's quieter areas (such as churchyards and open spaces) to avoid adverse noise and other amenity impacts from 24/7 activity and vibrancy.
9. There was very strong support for measures to address poor air quality in the City, with residents, workers, businesses and developers recognising that air

quality was a significant concern. Respondents highlighted the need for improvements to Beech Street and the potential introduction of City-level ULEZ. There was some concern from businesses about the detailed requirements for Air Quality Impact Assessments and a suggestion that these should be prioritised for new floorspace.

Strategic Policy S14: Urban Greening

10. There was widespread support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity. There was some concern from developers about the feasibility, deliverability and impact of viability of providing more greening on buildings, as opposed to around buildings.
11. Alongside the support for greening, there was a strong view that the draft Plan could go further and be more ambitious in its requirements and delivery. Similar comments were received in relation to biodiversity, with strong support for policies which seek to go further and deliver improvements in biodiversity across the City.
12. Much of the support came from individual residents, workers and wildlife and conservation groups. Developers, property companies and businesses, whilst supporting the ambition for a greener, more sustainable City, were concerned at the perceived inflexible nature of the policies and sought a more flexible approach which responded to opportunities on a site by site basis.
13. Residents, City workers and businesses were supportive of proposals to increase the number of open spaces in the City, particularly green open spaces, to provide more space for people to relax and eat lunch.
14. A number of respondents commented on the lack of specific policy protection for trees or policy support for additional tree planting in the City separately from measures aimed at increasing greening and open space provision.

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

15. Of the 60 responses received which commented on this policy, approximately half were from individuals, the remainder largely from business and transport organisations. A number of the comments were made in response to the draft Transport Strategy but were considered to be more, or equally, relevant to the development of the Local Plan.
16. Overall there was support for the general approach in the policy to minimise road danger and congestion and reduce vehicle emissions across the City. A small minority of respondents were opposed to proposed measures to reduce the number of vehicles or restrict their access to parts of the City. Those opposed to further restrictions included organisations and individuals who had made similar comments in respect of the draft Transport Strategy.

17. Whilst supporting the principle of reducing servicing and delivery trips within the City and supporting the concept of off-site consolidation, questions were raised about how this would work in practice. There was concern that off-site consolidation could become onerous, deter business occupiers and may not be feasible for all major development and that provision should be made for continued full on-site servicing where this can be justified. The current 1,000m² threshold for requiring consolidation was seen as too low. Respondents also recognised that the approach to consolidation is still in its infancy and policy needed to be flexible until the policy approach and potential solutions have matured.
18. There was support for encouraging greater use of the Thames for passenger and freight transport, including reinstatement of Swan Lane Pier and use of Walbrook Wharf for wider freight and servicing activity.

Strategic Policy S10: Walking, Cycling and Healthy Streets

19. There was support for the Healthy Streets approach and the commitment to improving the experience of using streets and spaces. Several respondents felt that the City Corporation could be more ambitious in how this is taken forward, with suggestions for further Healthy Streets (including Broadgate) and greater prioritisation for pedestrians/cyclists.
20. A number of responses supported further improvements to cycling facilities in the City, including more cycle lanes, greater prioritisation for cyclists and measures to further restrict vehicle use in the City. Changes to existing cycle lanes were also suggested, particularly in relation to Cycle Superhighway CS3. Alongside these proposals, others expressed concern at cyclist behaviour and the impact that this could have for road and pedestrian safety.
21. Several respondents suggested improvements and extensions to the City's highwalks, including within and around the Barbican, but also elsewhere in the City to deliver improvements in pedestrian safety. It was suggested that the City should take on board lessons from areas like New York.
22. Whilst there was widespread support for improvements to the pedestrian network and pedestrian experience in the City, including increasing permeability around, within and through large street blocks, there was also some concern from developers and property owners at the practicality of doing this. The provision of new pedestrian routes through buildings will need to have regard to design and security considerations as well as feasibility and viability.
23. The aspiration to improve the pedestrian comfort level in the City to B+ was supported in principle, although some developers and business organisations considered that this should be an "aspirational minimum", recognising that it may not be feasible to achieve in some parts of the City. The example of the City Cluster was given.

Tall buildings, protected views and heritage assets

Strategic Policy S13: Protected Views

24. There was overall support for continued protection of key views in the draft Plan (including St Paul's Heights, views of and from the Monument and the London Views Management Framework).
25. A number of the heritage bodies considered that the policy was not clear enough to protect key elements of the view of the Cathedral along the processional route of Fleet Street, Ludgate Circus and Ludgate Hill (ensuring a clear sky background to the western towers, between the towers and the dome, and the dome silhouette) and called for strengthening of the policy or revisions to supplementary planning guidance to ensure that development did not impinge on the foreground or background of the view of St Paul's from this route.

Strategic Policy S12: Tall Buildings

Areas inappropriate for new tall buildings – Figure 19

26. Many respondents considered Figure 19 to be ambiguous and required further clarity and amplification. Objections were raised to the implication that all other areas would be appropriate for tall buildings including the backdrop to the Tower of London when viewed from the south bank. Some respondents also objected to the implication that areas to the east of Aldersgate/West of Golden Lane and North of Beech St could be suitable for tall buildings.

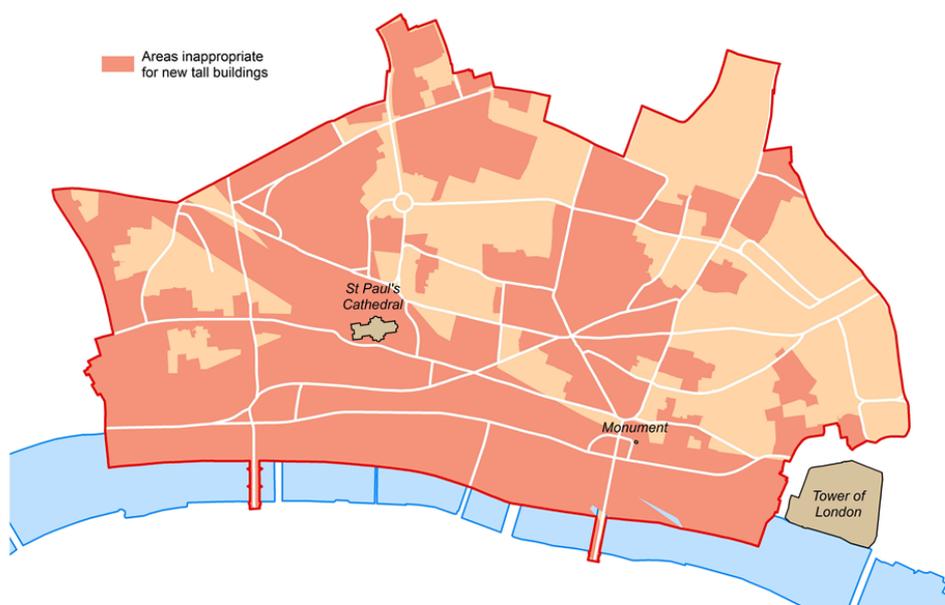


Figure 19: Areas inappropriate for new tall buildings

Definition of tall buildings

27. Neighbouring authorities suggested that the draft Plan should refer to the difference in the definition of tall buildings between the City (over 75m) and adjoining areas (over 30m in Islington and Tower Hamlets) and the possible impacts of tall buildings on conservation areas. The Mayor suggested that the Plan could adopt a lower definition of a tall building within the Thames Policy Area (the Mayor of London Order requires consultation with the Mayor of buildings over 25m in the Thames Policy Area).

Tall building design

28. There were a number of questions about the quality of design of tall buildings and suggestions that the policy should include an assessment of the cumulative impact of development, particularly the eastern edge of the City Cluster on the setting of the Tower of London.
29. A number of businesses considered that the requirement on developers to provide open space at street and publicly accessible open space or other facilities at upper levels could impact on viability and should be considered on a case for case basis. There was a suggestion that height limitations should be relaxed to provide additional public space at upper levels.

Strategic Policy S11: Historic Environment

30. There was significant support for policy to positively manage heritage assets, but many felt that the wording should better reflect NPPF guidance and reference designated and non-designated heritage assets.
31. Many business respondents considered that the public benefit of city growth ought to be considered when judging substantial harm to heritage assets.

Strategic Policy S21: City Cluster

32. There were mixed responses to the extension to the City Cluster. There was support for the continued focus on office development in this area, and for the need to consolidate servicing and deliveries. The Mayor and Historic England suggested that the boundary ought to be more clearly delineated rather than having an indicative boundary to provide further clarity on which sites would be included.
33. Heritage bodies were concerned that an extended City Cluster could have a detrimental impact on the Outstanding Universal Value of the Tower of London, and impact on views of St Paul's Cathedral.
34. Some business considered that the City Cluster ought to be further expanded to include additional opportunity sites, including further opportunities along Bevis Marks and Fenchurch Street.
35. There was a concern at the impact of further intensification of the City Cluster and additional pressures upon adjoining areas. The Mayor considered that there ought to be a co-ordinated approach to new development to ensure sufficient footway capacity and traffic reduction.

36. Both businesses and heritage bodies believed the 3D modelling should be publicly available and a vision included for the heights and massing of envisaged buildings.

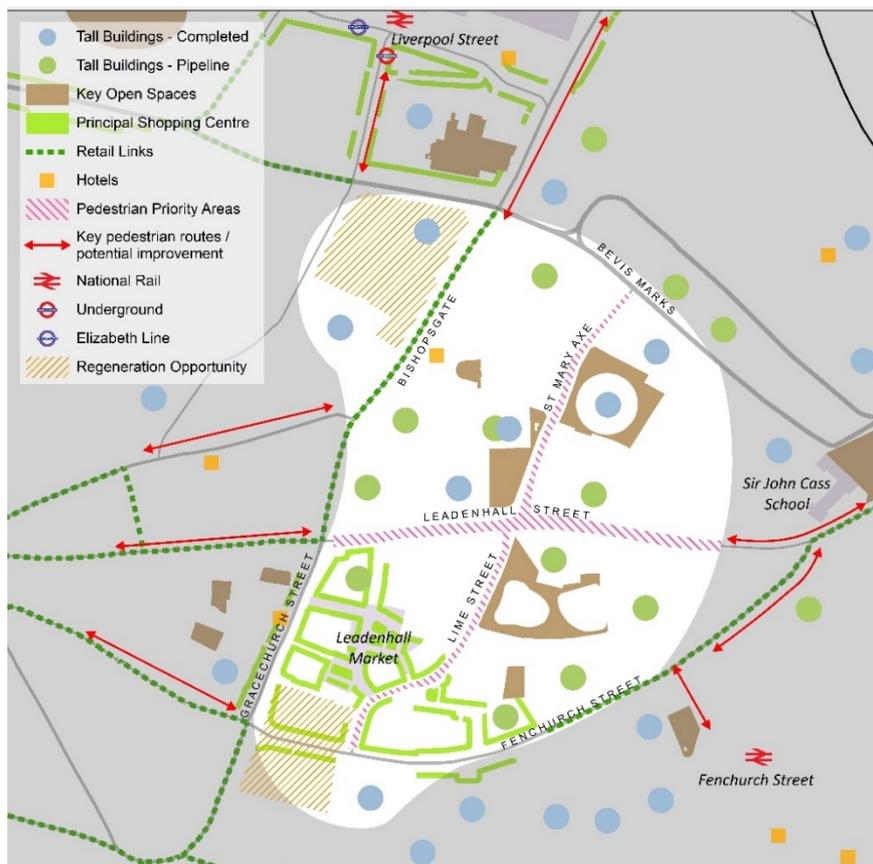


Figure 30: City Cluster Key Area of Change

Strategic Policy S23: Smithfield and Barbican

37. There was support for Culture Mile from the Museum of London, the Theatres Trust, the Mayor and some members of the public, citing the benefits of pedestrianisation, strengthening connections to other parts of the City, neighbouring boroughs and further afield, increased retail and food and beverage offer and supporting the creative industries.
38. A number of concerns were raised by residents within the Barbican and Golden Lane Estates that Culture Mile would increase night time activity which may impact upon residential amenity through additional noise disturbance, increase in pedestrian numbers using the highwalks, increase in traffic and light pollution from artificial light spillage. Concerns were raised that the Centre for Music and further tall buildings could be dominant and overshadow residential areas.
39. Further information was sought on the potential future uses of Smithfield Market following the Markets Consolidation programme and more detailed studies were sought on the pedestrian and vehicle movements around Smithfield and the Barbican, to alleviate concerns regarding increased traffic and pedestrian movements.

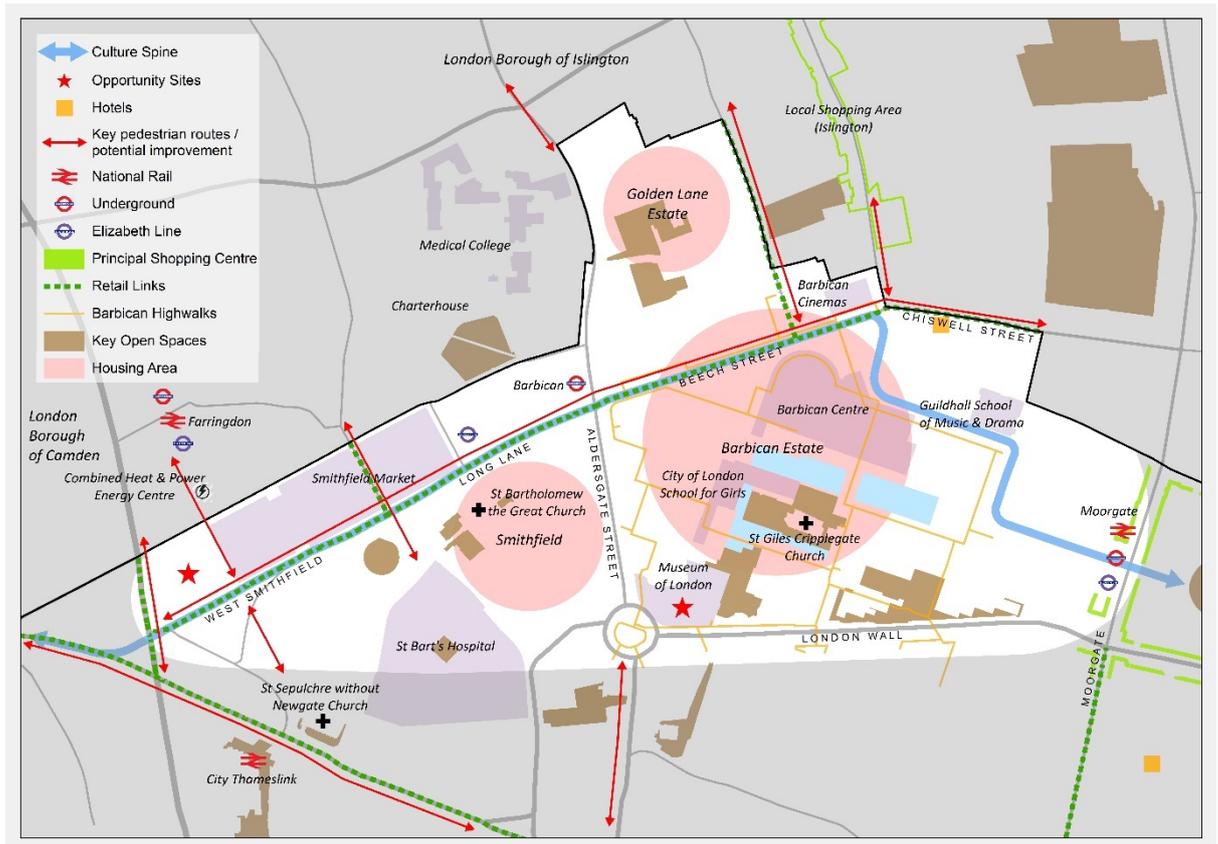


Figure 32: Smithfield and Barbican Key Area of Change

Comments on other parts of the draft Plan

40. Other parts of the draft Plan received a lesser number of comments, reflecting a degree of support for the approach taken, but also raising questions that will need to be addressed in proposed changes:

Strategic Policy S3: Housing

41. No comments were received from house building companies or the Home Builders Federation and relatively few other comments received on the proposed housing allocation. The Mayor supported the intention to meet the London Plan housing target and to concentrate housing in established residential areas.
42. Affordable housing generated more comment. The Mayor suggested that the requirement should be increased to 50% in line with the London Plan, with the tenure of affordable housing matching strategic London-wide needs and only 40% to be determined locally. City residents considered that the emphasis should be on provision of affordable housing on-site with a more robust approach to viability assessments to ensure policy compliance. Businesses, whilst supportive of the need for affordable housing, considered that there should be greater flexibility for this to be met through commuted sums.
43. There were concerns from residents that policies placed a greater emphasis on encouraging development than on residential amenity. Residents supported the continued emphasis on locating new residential development in established

areas but sought further changes to protect amenity, including the assessment of the cumulative effect of development and refusal of incompatible activities.

44. The need for access to services such as healthcare and quality affordable food was also raised.

Strategic Policy S4: Offices

45. Many businesses and the Mayor welcomed the planned growth in office floorspace. The Mayor indicated that further work should be undertaken to identify development sites and demonstrate that the growth in floorspace was deliverable.
46. There was strong support for the provision of flexible floorspaces to support small and medium sized enterprises, however many, including the Mayor and neighbouring authorities, thought further support was required for the provision of new, and protection of existing, low-cost business space. The London Borough of Islington suggested a collaborative approach which potentially used financial contributions from the City to help deliver affordable workspace in Islington.

Strategic Policy S5: Retailing

47. There was general support from the business community for additional retail floorspace, however some members of the public questioned why the draft Plan is seeking further space when nationally the retail market is changing.
48. Many respondents stressed the importance of leisure activities and experiential retail uses within the City and the need to move towards an evening economy and 7-day week trading.
49. Many business respondents considered that there should be more flexibility to enable use of vacant A1 units, further food and beverage offering, meanwhile uses, support for independents and specialist retail uses. This was supported by the Mayor who considered that the draft Plan failed to recognise the contribution of wider uses in generating vitality and interest in town centres.
50. Pedestrian permeability, public realm and quality-built environment were stated as important to maintain healthy retail footfall.

Other Key Areas of Change

51. Comments were received on all the proposed Key Areas of Change, with the majority of views expressed on the City Cluster and Smithfield and Barbican (outlined above).

Strategic Policy S17: Thames Policy Area

52. There was overall support for continuing to identify this area, but several respondents suggested that there needed to be greater co-operation with adjoining boroughs and agreement on a precise boundary for the area. There was support for continued office-led development, but also cultural activity and residential in appropriate locations.

Strategic Policy S18: Blackfriars

53. There were only 3 comments on this area, largely in support of the City Corporation's ambitions.

Strategic Policy S19: Pool of London

54. There was support for the overall ambition and strategy for regeneration of this part of the City. Individual land and building owners made representations regarding the potential future uses of their sites.

Strategic Policy S20: Aldgate & Tower

55. There was broad support for the City Corporation's ambitions, with a number of specific comments including the need for continued public realm enhancement, improvement of the experience for pedestrians and cyclists, the need for more active frontages onto streets, greater cross borough working and concern at the impact of development on the setting of the Tower of London.

Strategic Policy S22: Fleet Street

56. There was support for including this as a Key Area of Change, with comments suggesting a need for an improvement to this important processional route, with improved public realm and pedestrian access, improvements in the quality of retail and office offer.

Overall Viability of the Local Plan

57. There was some concern from developers about the cumulative impact of the Local Plan policies on the viability and the need to apply policies flexibly and appropriately to ensure they do not have a critical impact on deliverability of development.

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