



Local Plans Sub (Planning and Transportation) Committee

Date: FRIDAY, 19 JULY 2019

Time: 2.00 pm

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

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

Enquiries: Gemma Stokley
tel. no.: 020 7332 3414
gemma.stokley@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at 12.30pm
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 17 May 2019.

For Decision
(Pages 1 - 10)
4. **CITY OF LONDON LOCAL PLAN REVIEW: STRATEGIC ISSUES AND POTENTIAL PLAN CHANGES FOLLOWING PUBLIC CONSULTATION**
Report of the Director of the Built Environment.

For Discussion
(Pages 11 - 36)
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

Friday, 17 May 2019

Minutes of the meeting of the Local Plans Sub (Planning and Transportation) Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Friday, 17 May 2019 at 11.00 am

Present

Members:

Deputy Alastair Moss (Chairman)
Randall Anderson
Deputy Keith Bottomley
Deputy Jamie Ingham Clark
Graham Packham
William Upton QC

Officers:

Gemma Stokley	- Town Clerk's Department
Adrian Roche	- Department of the Built Environment
John Harte	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Michelle Price	- Department of the Built Environment
Alanna Coombes	- Department of the Built Environment

1. APOLOGIES

Apologies for absence were received from Christopher Hayward (Deputy Chairman) and Shravan Joshi.

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

There were no declarations of interest.

3. MINUTES

The public minutes of the meeting held on 6 March 2019 were considered and approved as a correct record.

MATTERS ARISING

Facilities for Public Cycle Parking (page 1) – A Member requested an update on what was being done to address the impact of development on Wi-Fi coverage as alluded to at the last meeting of this Sub Committee. The Assistant Director (Planning Policy) reported that he had raised this matter with the City Corporation's Strategic Infrastructure Advisor in the City Property Advisory Team (CPAT) who had, in turn, responded directly to the Member who had initially raised this matter. He undertook to circulate the update to the wider Sub Committee.

Outstanding Actions – Members requested that the Town Clerk introduce an Outstanding Actions report to be considered by the Sub Committee at all future meetings.

4. **CITY OF LONDON LOCAL PLAN REVIEW: REPORT ON PUBLIC CONSULTATION, KEY ISSUES RAISED AND PROPOSED NEXT STEPS**

The Sub-Committee considered a report of the Director of the Built Environment outlining the key issues that arose from the public consultation on the draft Local Plan for Members' discussion.

Officers clarified that the purpose of the report was two-fold and was intended to bring new members of this Sub-Committee up to speed on the background to the Local Plan and the public consultation around this but also to seek confirmation from the Sub-Committee in terms of how they might now want to proceed.

Officers went on to confirm that the comments received through the public consultation had been wide ranging with a range of opinions expressed throughout. Members were informed that, historically, the organisation's Local Plan had not attracted a huge number of public responses however, on this occasion an extensive and wide-ranging programme of engagement was undertaken including letters to all City residential addresses, emails to approximately 4,600 business on the City Occupiers Database and various stakeholder and public consultation events. As a result, the number of responses received was more than double that when compared with the last iteration of the Local Plan. Officers went on to clarify that some of the responses received (from the City Property Association (CPA) for example) were representative of a much wider group.

Members were informed that the responses received demonstrated that there was no single, dominant theme and that there was general support for the approach outlined within the document. There had been a lot of comment on transport which was unsurprising given that both the Local Plan and Transport Strategy were designed to be complimentary of one another and had both been out for public consultation at the same time. Opinions had been expressed in terms of protected views, height and bulk with regard to building design, support had been voiced for green infrastructure going forward and the tension between vibrancy and residential amenity had been a recurring theme.

Officers reported that a number of key areas of change had been identified within the Plan but that the two main areas that had attracted comment were Smithfield and Barbican as well as the City Cluster and what the intensification of development here actually meant at ground level.

Officers highlighted that the report put before the Sub-Committee also set out a proposed timetable in terms of how it was now proposed that the Plan be taken forward. A Member questioned how the proposed timetable fitted with the adoption of the London Plan. Officers clarified that, legally, the Local Plan needed to be in general conformity with the London Plan. However, it was recognised that the adoption of this was still very flexible and subject to

Government input and whether the Mayor accepts Government comment. In theory, the London Plan should always be a step ahead of the Local Plan. Members were assured that, at present, the Local Plan was broadly in step with the draft version of the London Plan which had undergone public examination. It was recognised that the Mayor intended to adopt the London Plan by the end of 2019. Officers also highlighted that the Mayor was not obliged to make any changes to the London Plan in response to any suggestions made by the inspector but would need to explain to the Secretary of State why he was not intending to do so if this were to be the case. It was also noted that the Mayor aimed to adopt a new London Plan before his term of office expired in Spring 2020.

In response to further questions, Officers clarified that further detail alongside a full schedule of those comments received through the public consultation on the Local Plan would be put to the Sub-Committee at future meetings. It was also noted that all of the comments made on the draft Plan were public and, as such, would be available on the City Corporation's public website shortly. Members noted that it would be particularly useful to see further detail on collective responses submitted by groups such as the CPA, GLA, Barbican Association and Historic England going forward.

A Member questioned how far reaching the consultation had actually been in terms of relevant stakeholders and how this differed to previous public consultations around the Local Plan. He went on to question whether Officers had examined where comments made on the Transport Strategy mapped in to this document given that many respondents would not necessarily differentiate between the two. It was also suggested that Officers consult the Air Quality consultation which had recently closed so that views expressed on these various different documents could be consolidated and synthesised. Members noted that work was currently progressing in terms of business intelligence software to assist in the collation of such responses/information.

Another Member recognised that it was apparent that there were some varying views on the Plan between residents and workers but went on to question how much was known in terms of the views of those using the City recreationally. He went on to reference the Fundamental Review which may affect the direction of travel in terms of the Corporate Plan and therefore have knock-on effects to this document in future. Officers recognised that this may be the case and the need for change could be considered once future corporate direction had been confirmed.

Members were in agreement with the point made around recreational use of the City/tourism. While noting that consultation drop-in events had taken place at the City Information Centre and other visitor venues, it was suggested that Officers consult with the City Corporation's Cultural & Visitor Development Director who had already undertaken a great deal of work around visitor perceptions of the City and produced a dedicated Visitor Strategy.

Members decided to discuss each of the key issues raised through public consultation as detailed within Appendix 1:

Vision and Objectives

Officers clarified that this was largely drawn from the Corporate Plan and that there had been overall support for this from both the business and residential community. As anticipated, some detailed points had arisen in relation to individual policies. The main concerns expressed by residents throughout had been in relation to the impact of development on residential amenity in terms of noise and pollution. There had been strong support for urban greening across the board. Responses from the business community had been more nuanced in terms of how urban greening might be delivered on buildings as opposed to around them.

Officers went on to report on the response received from Historic England which had been around the impact of development on the historic City, particularly in relation to the City Cluster. It was recognised that the consultation period had coincided with the Planning and Transportation Committee's consideration of 'The Tulip' application which may have added to the strength of opinion on this matter.

A Member spoke specifically on pollution and asked that there be further clarity around what was meant around this and what exactly the Plan would like to achieve/commit to in this area, recognising that this was a 20-year vision. He commented that, whilst transport contributed to approximately 50% of air pollution, combined heat and power (CHP) was also a major contributor. Another Member commented that if future legislation was passed around the use of CHP, another Committee would be responsible for acting on this. He went on to express concerns around the organisation still appearing to work in siloes in terms of cross cutting issues such as this which could prove problematic. He underlined the need to work collaboratively on such matters at both Member and Officer level going forward. The Chairman clarified that he was of the view that such matters were for the Chairmen and Deputy Chairmen of respective Committees to discuss and take forward at political level. He added that he was confident that these discussions were taking place at Officer level but recognised that these sorts of issues clearly pervaded the organisation's well constituted/established areas. Officers clarified that documents such as the Local Plan, Transport Strategy and Air Quality Strategy were corporate documents and provided readers with the context in which various different 'siloes' operate.

A Member clarified that Air Quality currently featured on the Corporate Risk Register and was a risk owned by Environmental Health. It was also recognised that air quality was often strategic and that it was equally important to work alongside partners outside of the authority/Square Mile to address the matter going forward.

Strategic Policy S1: Healthy and Inclusive City

Given that there was general support for this across the board, the Policy had been moved to the first section of the draft Plan in order to give it more weight. Businesses, whilst supportive of the approach here, had submitted comments around the methodology to be used for Health Impact Assessments and

requested that some flexibility be introduced. The detail of these comments would be shared with the Sub-Committee at future meetings.

Residents comments here had been around residential amenity and how quieter areas might be introduced and maintained in order to mitigate the impact of development.

Officers reported strong support across the board with regard to air quality.

A Member referred to electric vehicles and questioned whether there were any implications around road safety given that these vehicles tended to be silent. He suggested that this was something that the City Corporation might want to take a view on in an attempt to influence any new legislation that could emerge in relation to this.

A Member, picking up on the comments made by developers around flexibility, stressed the need for the Plan to introduce actual standards. He stated that, if there were specific aspects that simply did not work for commercial buildings, these should be addressed with the goal being to enforce the best standards possible here.

Another Member questioned what feedback, if any, had been sought from the Corporation's own Health and Wellbeing Board on this. Officers confirmed that the Board had had sight of the draft Plan ahead of public consultation but stated that they would be happy to consult them further at this stage if that was felt to be beneficial. The Chairman of the Health and Wellbeing Board, who was also in attendance, reported that the Board had had a brief discussion around this, and the Health Impact Assessments with Board members comments invited via email. She seconded the view that the Plan needed to be firm in its intentions and clearly explain expectations to developers.

The Chairman requested that a more holistic approach be taken and proposed that the consultation with the Health and Wellbeing Board be formalised going forward, recognising that input into this process at both Member and Officer level would be useful from this group.

A Member suggested that it would be helpful for the Sub-Committee to have more information on Health Impact Assessments going forward alongside the development community's concerns and the City Corporation's views. He went on to refer to the ongoing problem of engine idling within the City and questioned whether this should also be reflected within the Local Plan. He highlighted that there was a lack of signage around the fact that there should be no engine idling in the City and that this impacted on the ability of officers to issue notices in relation to this. He suggested that the introduction of sufficient signage could therefore be a 'quick win' going forward.

Strategic Policy S14: Urban Greening

Officers reported that, again, there was general support for this across the board although some concern around deliverability had been expressed by

developers. Aside from this, the general view was that the Plan could perhaps go further/be stronger in this area.

Views had been expressed around the provision of open space within the City and that there should be more of this as opposed to greening of buildings. Views also suggested that, where open spaces did exist, these should be green. Officers went on to clarify that a policy on trees would be included within the final Plan and that there was overwhelming support for more planting going forward.

A Member, whilst recognising the need to maintain good relations with the development community, questioned whether it would be fair to conclude that they were generally not as ambitious/keen on some of these policies as the organisation would like. He underlined the need to understand their specific concerns and to bring them to the table so that they were very much part of this process and clear on the objectives and expectations going forward. He went on to question who was responsible for the Tree Strategy referred to by Officers and when this was last reviewed.

Officers reported that the Tree Strategy was a Supplementary Planning Document to the Local Plan which the Department of Open Spaces led on. Officers stated that this was a shorter-term document which was currently reviewed every 5 years but undertook to provide Members with a fuller update on this at a future meeting.

A Member questioned whether the lack of a specific policy on trees was the result of a recent planning application. Officers confirmed that no one specific proposal had generated this and that the draft Local Plan had attempted to address tree planting as part of the wider Urban Greening Policy. Additional emphasis on tree planting would be included within the final version of the Plan. The Member went on to state that Members should ensure that, where possible, the provisions of the Tree Strategy were carried through in terms of decisions made on relevant planning applications. The Chairman recognised that many would 'cherry pick' from the various policies but emphasised that it was also possible to have more than one policy in contradiction with another as had been the case with recent applications. Officers supported this point and highlighted that the wording within the Plan made it explicit that the document should be considered as a whole.

The Chairman supported the points raised in relation to the development community's comments. He recognised the need for bold politics but underlined that the organisation still needed to maintain an element of predictability. Officers clarified that the CPA were positively supporting bold improvements in the City but that, as they represented such a diverse group, there were some caveats here.

Transport

Strategic Policy S9: Vehicular Transport and Servicing

Officers clarified that many of the comments received were similar to those submitted as part of the public consultation around the draft Transport Strategy and that there was a lot of support for this policy area.

Comments received tended to centre around congestion, the need to tackle vehicle emissions and consolidation/freight movements. Members were informed that there was support from amongst the development community for this. However, the current 1,000 m² threshold for requiring consolidation was seen as too low. Officers underlined that consolidation could, however, take different forms and it was recognised that it might be helpful to clarify this further within the final version of the Plan.

A Member underlined the need to provide clarity with regard to consolidation requirements stating that he was yet to see any meaningful improvement in terms of this in the City. He stressed that the matter should also be pursued with existing buildings in the City and not just be a condition on new developments. He went on to note that there was support from those responding to the public consultation around encouraging greater use of the Thames for passenger and freight transport. He stated that there was a caveat here in that many boats were more high polluting than cars and that this was something that the Plan might also look to address alongside the Port of London Authority.

The Chairman clarified that he was of the view that freight consolidation should be delivered across the board with the Corporation's high aspirations on this clearly set out. Essentially, the City wanted to become a place that vehicles entered by invitation only with deliveries only permitted at certain times of the day managed by way of certain conventions/licences. It was also entirely possible that future technological advances would mean that the rationale for and value of journeys by vehicle could be assessed going forward.

A Member questioned how the 1,000 square metre figure had been arrived at and stressed that this threshold could potentially undermine work around consolidation given that a large percentage of City businesses were small businesses. Another Member seconded this view and stated that buildings of this size could struggle to set up consolidation sites. Where possible, a collaborative approach with other nearby buildings should be encouraged to achieve critical mass.

It was noted that freight consolidation was also addressed within the Transport Strategy.

Strategic Policy S10: Walking, Cycling and Healthy Streets

Officers confirmed that there was strong support for this with many respondents wanting the Corporation to move faster and deliver more in this area.

A Member commented that cycling behaviour in the City was a huge concern for many and suggested that Officers look at how this might be addressed and the impact it had on road safety.

Tall buildings, protected views and heritage assets

Strategic Policy S13: Protected Views

Officers reported that the key issue here was the impact of development in the City Cluster on views of the Tower of London and how any policy might protect this and other views such as those of St Pauls.

A Member referred to the definition of tall buildings in the City as being those over 75m which differed from adjoining areas. He questioned whether this was also the figure used in relation to the areas that were highlighted within the Plan as being inappropriate for new tall buildings. Officers confirmed that this was the figure used for the City as a whole, with the exception of riverside development where developments in excess of 25m were deemed unsuitable. Members requested that the final version of the Plan offer further explanation and clarification as to why the definition of tall buildings differed between the City and adjoining areas such as Islington and Tower Hamlets where tall buildings were defined as those over 30m.

Officers clarified that, whilst this was the figure used by way of definition, all applications were judged on their merits. A Member commented that it was important to note this point and that there was always a balance to be struck in terms of benefits versus harm.

A Member questioned the comments received by a number of businesses with regard to height limits being relaxed to provide additional public space at upper levels. Officers stated that this was a matter for Members to decide but that it was not something that they would recommend.

Strategic Policy S21: City Cluster

Officers reported that there was strong support for the consolidation of servicing and deliveries in this area. It was noted that some businesses considered that the City Cluster ought to be extended further than suggested in the Local Plan.

A Member referred to the comments within the report suggesting that both businesses and heritage bodies believed that the 3D modelling should be publicly available and sought the views of Officers on this. Officers stated that they had made it known for some time now that they were using 3D modelling but that this has never been put into the public arena to date. They felt that it was reasonable that this request was now being made.

Strategic Policy S23: Smithfield and Barbican

Officers reported strong support for Culture Mile. However, this had also attracted some concern in relation to residential amenity. Further information was also sought as to the potential future uses of Smithfield Market which was viewed as key to the future development of the area.

Members noted that many of the leases at the Market site expired in 2028 and that the Local Plan was intended to be a 20-year plan. Members stated that, whilst they recognised that there was still a lot to be decided, they were keen for Officers to say as much as possible publicly on the future of the Market site when the new Local Plan was published.

Officers responded that they intended to put 'hooks' in place within the Plan at this stage but commented that the Markets Consolidation Programme was still at too early a stage to provide site specific guidance in the Local Plan.

Strategic Policy S3: Housing

It was noted that no comments were received from house builders. Affordable Housing generated more comment with the Mayor of London pushing for more of this in the City and suggesting that the requirement should be increased to 50% in line with the London Plan, with the type reflecting what he felt was needed across London as opposed to what the Corporation's Community and Children's Services Department felt was needed for the City. Officers noted that a series of background documents on this would need to be produced going forward.

Members also noted concerns from residents around the fact that a greater emphasis was being placed on encouraging development rather than on residential amenity. A Member questioned whether it would be possible to have something in the relevant policy going forward to require developers to consider space for healthcare provision/a GP surgery as desirable. The Chairman agreed that this would be a good idea.

Members went on to comment on the fact that the City Corporation was currently one of the authorities on a list of underperformers in terms of meeting housing targets and questioned whether Officers were concerned that the organisation was likely to remain on this list. Officers reported that an action plan would be submitted to the Planning and Transportation Committee in July 2019 and that they were confident that the City Corporation would be able to meet the set targets for the next few years. Beyond this, the organisation would be dependent on other 'windfall' sites coming forward.

Strategic Policy S5: Retailing

A Member commented that he felt that it was vital to provide additional retail floorspace and suggested that the Plan could look to adopt a more granular approach as to the type of retail that was desired and be smarter about what was encouraged.

Other Key Areas of Change

Officers outlined that a full schedule of comments on each of the key areas would be brought to future meetings of the Sub Committee.

5. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions.

6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no additional, urgent items of business for consideration.

The meeting ended at 12.36 pm

Chairman

Contact Officer: Gemma Stokley
tel. no.: 020 7332 3414
gemma.stokley@cityoflondon.gov.uk

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 19/07/2019
Subject: City of London Local Plan Review: strategic issues and potential Plan changes following public consultation	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Discussion
Report author: Adrian Roche, 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. At the previous meeting of this Sub-Committee on 17 May 2019, Members received an initial report on the outcome of the public consultation and set out their views on some of the key issues raised during the consultation.

The next stage in the Local Plan review process is to prepare responses to all the consultation comments received and to agree revisions to the draft Plan, which will then be published for a final stage of consultation likely to be in early 2020. The majority of comments received during the draft Plan consultation were either broadly supportive in nature or suggested relatively minor wording changes, and a full schedule of these will be presented to the Sub-Committee after the summer recess.

This report focuses on certain strategic issues in the draft Plan where consultation responses suggested either a significant change in policy approach or identified a policy conflict. The report outlines potential options in relation to each of these issues, including additional evidence that may need to be gathered, and seeks the views of the Sub-Committee on which options Members would wish to pursue.

Recommendation

Members are recommended to:

- Give their views on the options outlined in Appendix 1 of this report.

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, which was summarised in the report considered at the previous meeting on 17 May 2019 together with an analysis of the main issues raised through the consultation process.

Draft Plan Public Consultation Response

3. A total of 181 responses were received to the consultation, making approximately 900 individual comments. In addition, a range of comments were 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.
4. At the May meeting, Members asked for a breakdown of who responded to the consultation. Unfortunately, a detailed breakdown cannot be provided because personal details such as age, gender, ethnicity etc were not required to be provided for data protection reasons. A number of comments were submitted through social media channels or were handed in at drop-in events and, although they are valid comments on draft policy, they have generally provided little detail of the background of the respondents.
5. It is possible, however, to broadly estimate the proportion of responses that were made by residents, workers and visitors as well as by organisations, and those details are shown in the table below:

Category	Respondents	Percentage
Residents	42	23
Workers	44	24
Visitors	12	7
Businesses, developers and landowners	22	12
Amenity groups and residents' associations	15	8
Statutory bodies, e.g. local authorities	18	10
Social media responses	23	13
Academics/students	5	3
Total	181	100%

6. It is intended to upload a summary of each of the comments received onto the City Corporation's website in advance of this meeting. The comments will be uploaded to the following web page: www.cityoflondon.gov.uk/cityplan2036

7. Comments were received on all aspects of the draft Plan and there was no single, dominant theme. The majority of comments received were either broadly supportive in nature or suggested relatively minor wording changes. A full schedule of comments received, together with officers' recommended draft responses, will be presented to this Sub-Committee in the autumn.

Strategic issues

8. This report focuses on those key strategic issues which emerged from the draft Plan consultation, particularly those matters where consultation responses suggested a significant change in policy approach or identified a policy conflict.
9. It is important to consider these strategic issues first because decisions taken in respect of them will have knock-on consequences for other parts of the Plan. In addition, some respondents requested additional evidence to be prepared which could have implications for the overall Plan timetable.
10. Appendix 1 of this report identifies the following strategic issues:
 - Housing delivery and affordable housing;
 - Residential environment, including daylight and sunlight;
 - Office delivery, affordable workspace and loss of office space;
 - Culture, visitors and the night-time economy, including hotel provision;
 - Freight and servicing;
 - Tall buildings, including their definition and location and public space provision;
 - City Cluster Key Area of Change;
 - Smithfield and Barbican Key Area of Change and Culture Mile;
 - Definition of major development and policy thresholds.
11. Under each of these headings, the report briefly summarises the nature of the consultation comments received and identifies a range of options in response to those comments. Officers have made recommendations against the options identified and outlined the scope of any additional work and changes to the Plan that may be required. Members are asked to consider each of the recommendations and indicate whether they agree with them.
12. Following the meeting, officers will work up agreed changes to the Plan and will present these to the Sub-Committee for approval in the autumn, alongside other more minor Plan changes. The process of preparing a revised Plan will also be influenced by new evidence (paragraphs 13 – 15) and by any changes to London planning policies (paragraph 23). A new Planning Green paper has been

promised by the Government and this, together with any other changes to national planning policy, may further impact on the Local Plan.

Evidence base

13. The policies in the draft Plan were informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. Amongst the evidence published to support the draft Local Plan consultation were studies relating to the office market; retail needs; urban greening; flood risk; housing need; waste arisings and transitioning to zero carbon by 2050.
14. Further evidence is being gathered through the summer and autumn to support the next iteration of the Local Plan. This will an Infrastructure Delivery Plan, which will identify the infrastructure required to deliver the Local Plan and examine where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Another key piece of evidence will be an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile.
15. Some additional work may be required to ensure that the Plan submitted to the Secretary of State for examination is founded on robust and up-to-date evidence. Appendix 1 sets out in broad terms the additional evidence that may be needed to support certain Plan policies, which will vary depending on the nature of the options selected.

Integrated Impact Assessment

16. The draft Plan was informed by a draft Integrated Impact Assessment (IIA), which combined the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.
17. IIA is an iterative process and further assessment will need to be undertaken of any significant changes that are made to the draft Plan before it is published for the next round of consultation. The IIA is produced in-house but is being independently audited by consultants.

Next steps

18. In the autumn the Sub-Committee will be asked to consider proposed changes to the Plan 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.

19. Two further meetings of this Sub-Committee have been arranged in September and October as follows:
- 20th September – to consider a full schedule of proposed changes to the Local Plan in response to the consultation;
 - 9th October – to consider the full revised plan for approval and recommendation to the Grand Committee.
20. A provisional meeting has also been arranged for 9th September. Given the number of potential changes to be considered across the whole Plan, it is considered that this additional meeting is likely to be necessary to ensure Members have sufficient time to properly scrutinise the changes.
21. Following consideration by the Sub-Committee, the current 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
22. 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.
23. The timetable outlined above will be kept under review and may be affected by the outcome of the London Plan Examination in Public (EiP). The EiP hearings finished in May 2019 and the Panel's report is expected to be sent to the Mayor in September. The Mayor then has up to 8 weeks to publish the report and to send a copy to the City Corporation and the London boroughs. Your officers are liaising with officers at the GLA and will update Members in September on whether the City's Local Plan timetable should be adjusted in light of the London Plan's progress.

Corporate & Strategic Implications

24. 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 emerging Plan aligns with the adopted Transport Strategy.

Appendices

- Appendix 1 – key strategic issues

Background Papers

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

Adrian Roche

Development Plans Team Leader

T: 020 7332 1846

E: adrian.roche@cityoflondon.gov.uk

Appendix 1 – key strategic issues

Strategic Policy S3: Housing

Representations were evenly divided between residents and statutory or amenity bodies, with relatively few comments from the business sector. With the exception of a student housing provider, no responses were received from housebuilders or residential development promoters.

There was support for the overall housing target of at least 146 dwellings a year, including from Mayor. This target aligns with the draft London Plan.

The Mayor has indicated a need to provide greater certainty on future housing provision in the City, suggesting that the City Corporation allocate sites or provide greater certainty that new residential development will come forward to meet London Plan targets.

In general, residents and the Mayor were supportive of on-site affordable housing provision and the need to provide greater certainty. Developers have argued for greater policy flexibility for off-site contributions.

The Mayor would like closer policy alignment with the London Plan regarding affordable housing delivery, including reference to the Mayor’s strategic 50% target. The Mayor also indicated that there should be reference to City delivery on out of City estates (where a minimum of 50% is expected by the Mayor).

Options – S3 housing delivery	Officer comment
No material changes to draft policy or supporting text	Not recommended given the GLA’s comments and the City’s performance in the Government’s first Housing Delivery Test (published Feb 2019) – the City only delivered 42% of the Government’s assessment of dwellings required in the 3 years to 2017/18.
Provide additional detail in the supporting text on expected sources and timing of housing supply during the Plan period, including supply on City sites outside of the City’s geographical area	Recommended. Much of this work has already been done for the City’s Housing Delivery Test Action Plan. An evidence report will provide: an indication of level of new housing expected from small and large sites; reference past trends in delivery to demonstrate that the City has met and exceeded London plan targets; provide further information on the current planning pipeline (taken from Housing Delivery Test), which demonstrates over 6 year’s supply of housing; provide information from the City’s Strategic Housing Market Assessment on dwelling size and tenure needs.

	Further text will be added on proposed development on City estates (700 homes target) and the City's strategic target for an additional 3,000 homes.
Modify current policy approach to adopt a more flexible approach for office to residential conversions within existing residential areas	Not recommended. Relaxing the policy emphasis on office floorspace, even if confined to existing residential areas, would represent a significant change in Corporation planning policy. Sites already under construction mean that housing delivery is expected to exceed the London Plan target in the next few years. However, in the longer term (through future reviews of the Plan), this option may need consideration if further housing sites do not come forward as 'windfalls'.
Identify/allocate specific site(s) in Plan	City Local Plans have not previously allocated sites, relying on windfall development as opportunities arise. While this approach does not reflect national policy, it has been endorsed by successive Local Plan inspectors in view of the City's unique circumstances. No sites in the City were identified in the London Plan 'Call for Sites' undertaken by the GLA and the Corporation received no representations from housebuilders during the recent draft Plan consultation. If acceptable site(s) could be identified, this would provide reassurance to the GLA and potentially to a Planning Inspector at Examination. However, it would delay the Local Plan as we would need to consult on the site(s) to give other landowners an opportunity to put forward alternative sites for consideration.
Options – S3 affordable housing	
No material changes to draft policy, but provide greater clarity in the supporting text on how 35% will be delivered, including further explanation of how Mayor's Threshold Approach will work in the City	Recommended. The Mayor's Threshold Approach, set out in the draft London Plan, would exempt schemes that provide a minimum of 35% affordable housing from the need to provide viability evidence and could incentivise delivery of on-site

	<p>affordable housing in the City. Amendments to the supporting text will need to reference the London Plan's 50% strategic target for affordable housing and the expectation that future development on City-owned estates will aim to deliver at least 50% affordable housing.</p>
<p>Adopt Mayor's 50% strategic target for developments in the City (subject to viability)</p>	<p>Not recommended. Recent experience indicates that high development/build costs and the absence of grant funding would make such a target extremely difficult to achieve in the City. Affordable housing delivery has averaged just under 30% in recent years. The supporting text will make reference to the wider 50% target.</p>
<p>Introduce greater policy flexibility for off-site contributions</p>	<p>The NPPF and the London Plan indicate that off-site contributions should be the exception rather than the norm. The Sub-Committee was clear during preparation of the draft Plan that it wished to see a policy emphasis in favour of on-site affordable housing provision. The potential for off-site provision will remain as an exception.</p>

Policy H3: Residential Environment

There was some concern from individual residents and residents' organisations about the impact of Local Plan proposals on residential amenity. Amendments to policies were suggested to provide stronger protection for residents, including:

- Restrictions on on-street activities (particularly referencing Policies S24 Culture Mile Implementation and SB1: Culture Mile Impacts).
- Suggestions that a more restrictive approach to development, particularly night-time entertainment, be implemented around the four main residential Estates.
- In relation to daylight and sunlight (linking to Policy D8: Daylight and Sunlight), a need for greater clarity over how daylight and sunlight assessments will be undertaken and applied to protect residential amenity. On the other hand, there were some calls for greater flexibility in the policy to reflect the City centre context from developers.

Options – H3 uses and activities	Officer comment
No material changes to draft policy but amend the supporting text	Recommended. There are limitations on what can be achieved through planning control, as much of the concerns were around on-street activity rather than buildings. The supporting text will be amended to provide more detail on the need for effective management plans, the Agent of Change principle and links to other Corporation strategies. There should be cross reference between Policies HIC3, H3 and C4.
Take a more restrictive approach to on-street activities in and around residential areas	Not recommended. Much of the delivery of on-street activity is outside of planning control and the remit of the Local Plan. The Local Plan should reference other City Corporation strategies e.g. the Culture Mile Look and Feel Strategy, the Noise Strategy and the City's approach to street trading, but cannot control uses through planning.
Take a more restrictive approach to development in and around the main residential areas	Not recommended. While benefitting residential amenity, such an approach is considered unrealistic given the need to make efficient use of land and is likely to conflict with other policy objectives to support the business City and strengthen

	<p>the City's cultural offer. In principle, the Agent of Change approach and the requirement for management plans should ensure that night-time entertainment developments should not have an adverse impact on residential amenity.</p>
<p>Options – D8 daylight and sunlight</p>	<p>Officer comment</p>
<p>Clarify in policy that BRE will be applied consistent with a city centre context and provide greater explanation in the supporting text of how it will be applied - possibly defining minor, moderate and major impacts and including reference to assessment against retained light levels</p>	<p>Recommended. It is considered that the current policy approach has been broadly effective in balancing the needs of the business City against the protection of residential amenity, albeit that the BRE methodology has some limitations in a dense urban environment and needs to be interpreted flexibly. Changes could be made to assist the understanding and implementation of this policy, clarifying that it will be applied in a way consistent with a City centre context. This would also require changes to supporting text to provide greater explanation of how the policy would be implemented.</p>
<p>Seek to develop a new assessment methodology based on dense urban areas rather than relying on BRE methodology</p>	<p>Not recommended. Further work is being undertaken to understand whether there are particular City specific circumstances that need to be taken into account. This is likely to require detailed assessment and joint working with consultants, developers and residents and would significantly delay the Local Plan is progressed. At present, the technology does not exist to fully represent at the planning application stage how changes in daylight and sunlight are actually experienced by occupants. As this emerges, such assessment improvements could be reflected in a Supplementary Planning Document.</p>

Strategic Policy S4: Offices

Approximately half the comments received were from developers and businesses, with the remainder shared between residents and statutory bodies. There was concern from a few residents over the scale of office growth projected in the Plan and whether an ambition for 2 million square metres of additional floorspace was realistic in the light of Brexit and the move towards more agile and dense workspaces.

The Mayor supported the overall approach but considered that there needs to be greater certainty over where new office development will be located, and evidence that the floorspace target will be met. The Mayor's comments suggested that office development sites should be identified.

The Mayor, Islington and Hackney suggested that there should be specific support for subsidised affordable workspace to complement the London Plan and neighbouring borough Local Plans. If there is no policy, these authorities consider that the City Plan should be more explicit on how the approach in the City will complement those in adjacent boroughs.

In relation to Policy O2: Protection of existing office floorspace, developers and the CPA have suggested more flexibility is needed, particularly around the requirement that properties should demonstrate marketing for continued office use over a period of 18 months.

Options – S4 office delivery	Officer comment
No material changes to draft policy or supporting text	Not recommended. Given the GLA's comments, it is considered that more information is required to demonstrate need for and delivery of office floorspace. This evidence will also be required to demonstrate deliverability of Local Plan policies at Examination.
Provide additional detail on expected sources and timing of office delivery during the Plan period, such as distribution of new office floorspace across the City, both in text and evidence documents	Recommended. More detailed evidence will be published setting out the justification for the 2m sqm floorspace target. Supporting text should be amended to provide more detail about where new office development will take place, updating Table 2.3 in the current Local Plan. Further information will be provided on the office development pipeline, referencing schemes which have been agreed by Committee but do not yet have formal planning permission. Further supporting text could be

	added addressing issues of economic uncertainty, highlighting the need for further review if there is significant change in the office market.
Modify current office floorspace target from a single numerical target to a broader range	Not recommended. The current target approach already provides flexibility for adjustments to the 5-year phasing and provides a clear framework for monitoring progress on an annual trajectory. The current target is already in the middle of a range of outcomes.
Identify/allocate specific site(s) in Plan	Not recommended. The long-standing approach in the City has been that all sites are potentially suitable for office development. This approach is supported in the London Plan, through its policies for the Central Activities Zone, which emphasise the beneficial cluster of financial and professional services in the City.
Options – S4 affordable workspace	Officer comment
No material changes to draft policy or supporting text	Not recommended in light of the comments from the GLA and neighbouring boroughs.
Provide more detail on the types of workspace being sought and how this might complement neighbouring boroughs – this could be an extension to existing policy approaches, with explanation in the text	Recommended. Minor changes are proposed to Policy S4 to clarify references to affordable and flexible floorspace. The supporting text should reference: the rental differential between the City and Westminster making the City a more attractive office destination; support from the City Property Advisory Team for companies looking to locate in the City; the range of office types and prices, including Grade B space, which can address some needs; the significant growth in serviced office provision which provide flexible and adaptable space and flexible leases/rents for smaller

	businesses. To address comments from the Mayor and neighbouring boroughs, the text should address the potential for complementary approaches with neighbours, e.g. providing potential move-on accommodation
Introduce a policy that requires a proportion of subsidised workspace to be provided within larger office developments	Not recommended. There is no substantive evidence of a need for subsidised workspaces in the City, including within the Culture Mile area. The City's CPAT Team already provide significant support to companies looking to locate in the City and flexibility of accommodation and lease arrangements are considered to be the key factors in the City.
Options – O2 protection of existing office floorspace	Officer comment
No material changes to draft policy or supporting text	Not recommended. There have been objections to the proposed 18-month marketing period requirement and there is no local evidence to suggest that this would be an appropriate time period or would provide greater protection for existing office accommodation.
Modify requirement for marketing, but retain strong policy presumption against loss of office floorspace (effectively reverting to current Local Plan approach)	Recommended in part. Suggest removal of formal marketing period but retain the policy requirement for changes of use to be supported by evidence of marketing. Further guidance on appropriate marketing could be set out in a revised Office Use SPD. The Sub-Committee indicated during preparation of the draft Plan that it wished to move away from a solely viability-based approach to the loss of office floorspace.

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

Two key issues emerged from the consultation:

Policy C3: Hotels. There was concern from the development industry that the policy restricts the potential for hotel development and that there needs to be a more supportive policy.

On the other hand, residents raised concerns about the impact of hotel development on residential amenity, particularly in and around the Culture Mile area.

Policy C4: Evening and Night-Time Economy. Developers (including the CPA) raised concerns about the detailed implications and deliverability of the policy, e.g. around the production of management plans at the application stage (when occupiers may be unknown). There is also concern that the policy does not sufficiently recognise the importance of the night-time economy to the overall economy.

Residents raised concerns about the impact of the night-time economy on residential amenity. This links to concerns about Culture Mile and its impacts on the Barbican and Golden Lane estates but extended wider to included residential properties in other parts of the City.

Options – C3 Hotels	Officer comment
No material changes to draft policy or supporting text	Not recommended. Consultation revealed concerns about the draft policy and several neighbouring boroughs appear to be adopting a more restrictive policy approach towards new hotels. In that context, the City may need to adopt a more supportive position, particularly to service the Culture Mile.
Adopt a more supportive policy approach, e.g. a more flexible approach to office to hotel conversions. This could be City-wide or within specific areas, e.g. Smithfield/Barbican KAOC to service Culture Mile	Recommended in part. The Local Plan should recognise that its cultural ambitions need to include making appropriate allowance for hotel accommodation for visitors, alongside accommodation for businesses. The existing Local Plan approach of concentrating hotels in areas close to the Tower of London and St Paul's Cathedral could be retained, alongside a more supportive approach around Culture Mile. Specific reference could be made in the text to the opportunities for hotel development in listed buildings, e.g. the Ned.

<p>Adopt a more restrictive policy approach, e.g. resisting hotels in and around the residential areas</p>	<p>Not recommended. Restricting hotel development in principle in appropriate locations would appear to be contrary to the City's cultural ambitions. Each scheme should be considered on its merits taking account of the local context.</p>
<p>Options – C4 Evening and night-time economy</p>	<p>Officer comment</p>
<p>No material changes to draft policy, but provide further guidance within the text on the Agent of Change principle</p>	<p>Recommended. It is considered that the draft policy strikes a reasonable balance between the promotion of the night-time economy and the protection of residential amenity. Further guidance on how the Agent of Change principle will operate should be set out, together with cross reference to other policies in the Plan – HIC3 and H3.</p>
<p>Adopt a more flexible policy approach, e.g. allowing some design and management issues to be agreed by planning condition</p>	<p>Not recommended. It is acknowledged that the end occupiers are not always known at the planning application stage, but it is important that physical and operational measures to reduce potential disturbance and anti-social behaviour are considered at the earliest possible stage of the design process to avoid the need for later retro-fitting.</p>
<p>Adopt a more restrictive policy approach, e.g. resisting night-time uses in and around the residential areas</p>	<p>Not recommended. NPPF and London Plan policy includes the Agent of Change principle which would require new night-time entertainment uses to put in place measures to prevent disturbance to residents. Greater restriction on the location of such uses is unlikely to be deliverable in light of this new approach or the emphasis given to the night-time economy in the Draft London Plan and the Mayor's Night-Time Economy SPG.</p>

Strategic Policy S9: Vehicular Transport and Servicing

There was concern from parts of the development industry, including the CPA, about the requirements for freight consolidation. This centred on the fact that the draft policy required consolidation for all major development, defined as development of 1,000 m² gross floorspace or more. Developers suggested that physical consolidation should be limited to buildings over 10,000 m² and that policy should explicitly reference the potential for 'virtual' consolidation (which involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building).

There was some concern from residents regarding the potential adverse impacts of evening/night-time freight deliveries and servicing on residential amenity. In addition, the development industry expressed some concerns that the policy needed to acknowledge the additional costs of servicing overnight.

Options – S9 freight and servicing	Officer comment
No material changes to draft policy, but clarify that policy relates to physical and virtual consolidation	Recommended. Further guidance should be provided on the City's requirements and the benefits to business of consolidation. This could include cross-reference to the Transport Strategy and Action Plan. Emphasising the need for all development to consider consolidation, either physical or virtual, would provide policy support for Transport Strategy ambitions.
Introduce a higher threshold for physical consolidation	Recommended. Requiring physical off-site consolidation for smaller developments could impact on their deliverability. However, this should be seen alongside the requirement for all development to consider consolidation in some form (see above). In liaison with the Transport Strategy Team, consideration will be given to a potential higher threshold.
Modify policy to only require evening/night-time/weekend deliveries and servicing in certain areas (e.g. City Cluster)	Not recommended. The draft policy already indicates that late evening and weekend deliveries should not apply in residential areas. Any further exemptions could undermine the delivery of some of the Transport Strategy's objectives.

Strategic Policy S12: Tall Buildings

This policy attracted a relatively large proportion of comments, spread across residents, workers, the development industry, statutory and amenity bodies and social media comments.

The Mayor and some neighbouring boroughs raised questions about the definition of tall buildings and whether the City's definition should be more closely aligned with those in other boroughs. The Mayor indicated that the Plan should define a lower height in the Thames Policy Area.

Figure 19, which illustrates areas inappropriate for tall buildings, attracted a lot of comments. The Mayor, Tower Hamlets, Historic Royal Palaces, Historic England and residents have suggested that Figure 19 needs to be amended to provide greater clarity. In particular, it was argued that it should identify London Views Management Framework background settings as inappropriate and recognise that tall buildings are inappropriate around the Barbican and Golden Lane Estates.

The draft London Plan requires boroughs to identify where tall building clusters may be an appropriate form of development (not just areas where they are not) and to indicate the general building heights that would be considered appropriate in these locations. It was suggested that evidence could include further detail of the City's 3D modelling. However, some developers sought greater flexibility for tall buildings outside areas such as the City Cluster, arguing for instance that they may not always be inappropriate in conservation areas.

The development industry, including the CPA and British Land, raised concerns about the provision of public space around and within tall buildings, particularly at upper levels. Developers are concerned about the requirement for publicly accessible spaces at the top of tall buildings, alongside providing space at ground level and through buildings.

Options – S12 definition and location of tall buildings	Officer comment
No material changes to draft policy but make changes to the supporting text	Recommended. While much of the policy wording is considered to be robust, the issue of what constitutes an appropriate or inappropriate area for tall buildings appears to have caused some confusion. Changes to Figure 19 in particular, together with changes to the supporting text are required to provide greater clarity (further detail is set out below).
Introduce a more nuanced approach to defining tall buildings, e.g. higher threshold in City Cluster and/or lower along the riverside	Not recommended. The definition adopted reflects the monitoring definition used by the City for a number of years and has the

	<p>advantage of being clear and consistent. It does not mean that buildings up to 75m would be permitted on the riverside. However, it should be made clear in the supporting text that the height of development in areas impacted by strategic and local views will be determined by views considerations. Reference should also be made in the text to the requirement to refer schemes over 150m City-wide to the Mayor, except along the Thames, where the threshold is 25m.</p>
<p>Change the policy emphasis by identifying areas where tall buildings would be appropriate rather than inappropriate, reflecting approach in Draft London Plan and revised guidance from Historic England</p>	<p>Not recommended. The draft Plan already identifies the City Cluster as the most appropriate area for tall buildings in the City (para 6.5.5). Adopting such a policy approach may provide greater clarity over where tall buildings would be permitted but would reduce flexibility and the ability to consider other more local townscape, transportation and public realm issues. Not all sites in areas where tall buildings are appropriate in principle will be suitable for tall buildings. Whether or not a particular site is appropriate for a tall building is dependent upon the site context and requires a more granular level of assessment than would be desirable in a Local Plan. However, if Members are minded to explore the implications of this option in more detail, officers could undertake further work over the summer and report back in September/October on how such an approach might work in the City.</p>
<p>Options – S12 public space and tall buildings</p>	<p>Officer comment</p>
<p>Modify the draft policy to better reflect the wording in para 6.5.10, which emphasises a wider range of potential public uses than viewing galleries</p>	<p>Recommended. Additional flexibility should be introduced to better reflect the wording in para 6.5.10, which indicates that accessible public space at upper levels may comprise features such as retail, leisure or</p>

	<p>educational facilities or areas of open space including roof gardens or public viewing galleries. The policy should also make clear that open space could be provided at various levels of a tall building, not necessarily always at the top.</p>
<p>Modify policy to remove the requirement to provide publicly accessible spaces facilities at upper levels of tall buildings if they provide demonstrable street level enhancements</p>	<p>Not recommended. The City Corporation has been very successful in achieving publicly accessible space at the upper level of tall buildings. Removing this requirement will make it difficult to achieve further spaces and could impact on the deliverability of spaces already permitted but not yet constructed.</p>

Strategic Policy S21: City Cluster

Many of the comments made in relation to tall buildings also related to the development of tall buildings in the Cluster. Cluster specific issues included:

- The CPA and a few landowners/developers suggested further extension of the Cluster (south and along Fenchurch Street and north of Wormwood Street) to permit additional tall buildings.
- A mix of views on whether the City Cluster should continue to be shown in notional form in the Local Plan or whether a specific boundary should be identified.
- Comments from some occupiers, residents and workers about the need for stronger policy support for public realm and transportation improvements to facilitate continued development and intensification.

Options – S21 City Cluster Key Area of Change	Officer comment
No material changes to draft policy	Recommended in part. The policy itself was broadly supported in principle. The area is intended to be indicative.
Extend the City Cluster area further to the north and/or south	Not recommended. The area of the City Cluster as shown in the KAOC diagram is indicative. Not all sites within the Cluster are suitable for tall buildings and appropriate sites outside the Cluster could be suitable. The shape of the Cluster reflects 3D modelling work, and this could be further explained in the supporting text.
Define a boundary for the City Cluster and show this on the Policies Map	Not recommended. This is intended to be an indicative boundary, as are all the KAOC's. The issue of where tall buildings should be located, which underpins the requests for a definitive boundary, could be addressed by changes to the tall buildings policy and Figure 19. Local Plan policy allows tall buildings to be developed in appropriate locations outside of the City Cluster.
Adopt a more formulaic approach which seeks to match the delivery of open space and public realm improvements to new floorspace	Not recommended as this is considered too prescriptive to reflect the variety of site circumstances found within the Cluster.

	<p>Nevertheless, additional detail on proposed transport and public realm improvements should be added to the Plan, reflecting the Transport Strategy and Action Plan and the City Cluster Vision.</p>
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Strategic Policies S23: Smithfield and Barbican; S24 Culture Mile Implementation; and S25 Smithfield

A range of comments were received regarding the proposals for Smithfield Market and Culture Mile, and potential impacts on residential amenity:

- Residents, while generally supportive of cultural uses in principle, expressed concerns over the potential impacts of increased visitor numbers, night-time entertainment and on-street activities.
- On the other hand, the proponents of the Culture Mile and some others sought a greater emphasis on outdoor performance and animation of key routes/streets.
- A view was expressed that the Plan places too much emphasis on cultural activity in this area to the detriment of other parts of the City.
- Some Barbican residents commented on the emerging proposals for the Centre for Music, which attracted a mix of opposition and support in principle (subject to no impact on residential amenity).
- St Paul’s would like to see a policy commitment to improve the route between The Barbican and Tate Modern via St Paul’s as part of its proposals for a ‘World Square’.
- Comments were received about the need for the Plan to provide greater certainty over the future use of Smithfield Market. There was comment from market traders that the Plan should continue to support the market in its current location.

Options – S23, S24 & S25 Smithfield and Barbican Key Area of Change/Culture Mile	Officer comment
No material changes to draft policies	Recommended in part. The draft policies are not considered to require major revision, but some changes are recommended as summarised below.
Modify draft policies to provide greater emphasis on the protection of residential amenity	Not recommended. Policy SB1: Culture Mile impacts already addresses a range of amenity issues. Other policies in the Plan (Policies HIC3, H3 and C4) provide further protection for residential amenity. Further supporting text should be added to reassure residents that the major projects will be required to undertake detailed assessment of issues such as noise, trip generation and pedestrian flows and to identify appropriate mitigation of any adverse impacts.

<p>Introduce policy guidance on preferred future uses of Smithfield Market</p>	<p>Recommended. Policy should not be prescriptive at this early stage in the process. However, given the significance of this site to the Corporation's aspirations for the whole area there is a rationale for incorporating some additional wording on future uses within the Plan, supplemented by later area-specific guidance. Officers are working with the City Surveyor to consider appropriate wording.</p>
<p>Commit to preparing more detailed area-specific guidance on Smithfield Market to support the Plan policies, e.g. Supplementary Planning Document or planning brief</p>	<p>Recommended. A site of this size, significance and historic interest will require area-specific guidance to ensure that planning, transportation and public realm challenges are effectively addressed and that opportunities are fully realised.</p>

General Comment

Across a number of policies, there were comments from the CPA and some landowners/developers about the definition of major development in the Plan and whether a single definition of 1,000 m² is appropriate for all policy aspirations, e.g. for freight consolidation and meeting certain sustainability standards.

Options – major development / thresholds	Officer comment
Retain single definition of 1,000 m ² appropriate for all policy aspirations	Not recommended. The definition of major development in the draft Plan reflects the NPPF and the London Plan and should be retained. However, some flexibility should be introduced for specific policies where a threshold of 1,000 m ² could impact on the deliverability of development.
Introduce a more nuanced approach with different thresholds for different policies	Recommended in a limited number of cases. Specific examples could include the threshold for requiring physical off-site consolidation and for requiring retail impact assessments.

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