



Local Plans Sub (Planning and Transportation) Committee

Date: TUESDAY, 14 JANUARY 2020

Time: 1.45 pm

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

Members:

Deputy Alastair Moss (Chair)	Deputy Jamie Ingham Clark
Sheriff Christopher Hayward	Shravan Joshi
(Deputy Chairman)	Graham Packham
Randall Anderson	William Upton QC
Deputy Keith Bottomley	
Christopher Hill	

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

Lunch will be served in the Guildhall Club at 1.00pm
NB: Part of this meeting could be the subject of audio or video 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 19 July 2019.

For Decision
(Pages 1 - 10)

4. **CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED SUBMISSION VERSION OF CITY PLAN 2036**

Report of the Director of the Built Environment.

For Decision
(Pages 11 - 198)

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

6. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Friday, 19 July 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, 19
July 2019 at 2.00 pm

Present

Members:

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

Officers:

Gemma Stokley	- Town Clerk's Department
Annie Hampson	- Chief Planning Officer and Development Director
Adrian Roche	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Peter Shadbolt	- 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 of the meeting held on 17 May 2019 were considered and approved as a correct record.

MATTERS ARISING

Facilities for Public Cycle Parking (page 1) – A Member referred to the update on Wi-Fi coverage that was requested at the last and previous meetings of this Sub Committee. He added that he and other Members were still yet to receive this information.

Outstanding Actions (page 2) – Members requested that Outstanding Actions feature regularly on future agendas of this Sub Committee even if the document simply detailed that there were no outstanding actions at present.

4. **CITY OF LONDON LOCAL PLAN REVIEW: STRATEGIC ISSUES AND POTENTIAL PLAN CHANGES FOLLOWING PUBLIC CONSULTATION**

The Sub Committee considered a report of the Director of the Built Environment focusing on certain strategic issues in the draft Local Plan where consultation responses suggested either a significant change in policy approach or identified a policy conflict.

Officers reported that alongside each of these issues was a set of potential options and Officer recommendations on the way forward.

Draft Plan Public Consultation Response

Officers drew attention to the breakdown of responses received to the draft Plan, highlighting that there was a fairly even split here between residents and workers. Officers also highlighted those responses received via Social Media on this occasion.

The Deputy Chairman commented that he did not feel that the number of responses received, which totalled 181, was adequate given that there were approximately 8,000-9,000 residents in the City and that over half a million workers were also here each weekday.

Other Members concurred with his point and also went on to question why there was no consistency between how the responses on this Plan and the Transport Strategy were coded.

The Chair reported that he had recently discussed with the Chief Planning Officer and Development Director how the City consulted generally on such documents and who the main consultees tended to be. He added that he was also aware of certain social media apps which promoted greater input.

Officers clarified that they had written to every residential address in the City seeking input into the consultation process. They had also written to all commercial occupants, statutory bodies (including Local Authorities and Amenities) and had also held workshops and public meetings on the draft Plan. Lunchtime and evening sessions in office foyers and other public places had also taken place across the City, but Officers were keen to underline that these efforts did not always translate into comments/feedback.

Members were informed that the draft Plan was a 180-page document and therefore a very different type of document to the Transport Strategy. The Transport Strategy had also had its own dedicated website set up requiring respondents to register and provide details on their background before commenting on the Strategy.

A Member questioned whether Officers had any statistics as to the number of times that the draft Plan had been viewed/downloaded. Officers stated that the draft Plan webpages had had approximately 5,000 'landings' to date.

A Member went on to express concern about the organisation seeming to still operate in siloes in terms of consultation on these types of documents. He

suggested that Officers needed to work harder in order to get a better strategic base in terms of who was to be consulted. He added that the GLA had recently done a fantastic job consulting on their Sports Strategy.

A Member referred to recent consultation on Bank Junction which had been very focused and specific. He stated that a strategic document such as this was more complex and suggested that the job of Officers and Members should perhaps therefore be to develop strategy and then consult, more specifically, around outcomes. Another Member agreed with a more specific approach and questioned what might be done going forward to direct particular consultees to particularly relevant recommendations within larger strategic documents such as this.

Members were generally of the view that it would be preferable to seek professional skills in terms of engagement in order to achieve optimum outcomes going forward.

In response to further questions, Officer stated that they would be happy to recirculate the information previously provided to this Sub Committee on what media advertisement was used regarding the draft Plan consultation. Officers also reported that the City Corporation's Comms Team had been fully engaged with this exercise.

Officers were keen to point out that some of the responses received were from bodies such as the CPA and the Barbican Association which, whilst only counting for a single response, were actually quite significant in that they represented the views of many.

The Chair questioned whether there was sufficient time for further consultation on the Local Plan without significantly delaying the progress of the Plan. He suggested that he and the Deputy Chairman look to explore this further with Officers outside of the meeting given that the general mood of this Sub Committee was that the outcomes to date were not as hoped. He went on to recognise that budget and timescales would need to be considerations and also stated, in defence of Officers, that the same consultation process tended to be carried out elsewhere with a similar exercise in Westminster at the end of 2018 attracting almost identical levels of response.

Evidence base

Officers highlighted that further evidence would need to be gathered through the summer and autumn to support the next iteration of the Local Plan. This would take the form of an Infrastructure Delivery Plan. It was also highlighted that there was a requirement to undertake a viability assessment of the entire plan which was seen as a key test – Officers clarified that this was not only in relation to housing but on a combination of policies within the plan.

The Chair underlined that it would be essential to make that as robust as possible. He questioned whether it was intended that there be any Member oversight of the Infrastructure Delivery Plan. Officers reported that a session to look at this in more detail alongside Members would be held in the Autumn.

This would be separate to the Local Plan Sub-Committee consideration and utility firms would also be invited to attend.

Officers concluded by stating that the current target dates for Committee approval set out within the report were partly dependent on the progress of the wider London Plan and may, therefore, be subject to change.

Appendix 1 – key strategic issues

Strategic Policy S3: Housing

Officers reported that responses suggested that there was overall support for the amount of housing to be delivered and also the suggested approach to this within the draft Plan. There were some specific comments from the Mayor of London to respond to in relation to this policy. Officers highlighted that they were of the view that there was a need to provide further evidence to support what had been done/what was going to be done but that they did not recommend the identification of any specific sites.

S3 Housing Delivery

A Member stated that there seemed to be a desire from the Mayor to move planning policy away from the traditional approach and more towards a 'zoned' approach with clearly defined residential zones going forward.

Another Member stated that, whilst housing sites existed elsewhere, he was of the view that the City was a justifiable exception.

S3 Affordable Housing

A Member questioned why there was no specific reference to Social Housing here. Officers reported that the requirement was for 35% affordable housing and that most of what was needed as part of this, in the City's case, would be Social Housing as opposed to shared ownership or other low-cost properties.

A Member, also the current Chairman of the City's Community and Children's Services Committee, stated that the organisation currently operated a policy where they financial contributions for delivery off-site which, in his opinion, was not working. He added that he was very strongly of the view that the commuted sum should never serve as an incentive and highlighted that this was already being looked at in more detail at present. Other Members welcomed this move.

Officers reported that they were of the opinion that whilst 35% affordable housing was realistic in the City, the Mayor's 50% strategic target was potentially not. It was therefore suggested that an approach stating that 50% would be delivered on the City's own estates and at least 35% within the City itself be agreed. A Member highlighted that there was a difference between affordable and Social housing and suggested that the two might be blended in order to achieve the 50% target.

As an aside, a Member observed that housing development within central London was virtually at a standstill at present which seemed to suggest that the Mayor's policy here was failing.

Policy H3: Residential Environment

Officers reported that many responses here had referenced policies concerning Culture Mile and restrictions on on-street activities.

Officers highlighted that there were limits as to how much planning could control in terms of control of on-street activities. This could, however, be clearly linked to transport and licensing policies within the draft Plan. There would also be more detail on the Agent of Change principle although no significant changes to draft policy were recommended at this stage.

Members recognised that Licensing were often tightly constrained around what powers they had and what conditions they might apply. It was felt that Planning was a crucial element here in terms of applications centring around the night-time economy and could often have more “teeth” in terms of setting out requirements for certain hours of operation, management plans and the construction of double lobbies for noise control for example.

D8 daylight and sunlight

Members stated that they were supportive of the Officer recommendations set out here.

The Chief Planning Officer and Development Director reminded Members that a report setting out some suggested guidelines and clarification around this was due to be considered by the 30 July meeting of Planning and Transportation.

Strategic Policy S4: Offices

Officers reported that comments on this policy had centred around four areas – the scale of office delivery, where offices would be delivered, affordable workspace and protection for existing office floorspace.

S4 Office Delivery

Officers referred to the target of providing 2 million square metres of additional floorspace and highlighted that this figure was well founded and that evidence around how this would be achieved would be provided to support the Plan. The present situation was being monitored with over 800,000 square metres currently under construction and a further 400,000 square metres approved but with works not yet commenced.

In terms of identifying specific sites for future development, information on where new floorspace is expected to be delivered would be included in the next iteration of the plan.

In response to a question, Officers reported that progress against the target is monitored annually and would be reviewed every 3-4 years.

S4 Affordable Workspace

Some responses, had suggested that a policy requiring large developments to set aside space for affordable workspace should be introduced, including from the GLA and neighbouring boroughs. Others, such as that from the CPA

argued that there should not be a formal affordable workspace policy. Officers were not, however, in agreement. It was felt that the market was offering such space anyway and Officers cited WeWork as a specific example of this. They were confident that this could be evidenced as an argument against prescribing the need for affordable workspaces. Members were generally supportive of this and favoured allowing the market to continue to move organically.

O2 protection of existing office floorspace

Officers reported that office space was protected in the current Local Plan with more flexibility around listed buildings/heritage sites. Many responses were of the view that the 18-month marketing period was overly prescriptive, and Officers suggested that the new plan may provide the opportunity for greater flexibility.

A Member stated that expertise suggested that marketing evidence was important. He added that the London Plan referred to a marketing period of 12 months as opposed to 18 and suggested that the draft Local Plan could look to adopt this going forward on the basis that it was likely to have been much debated already.

Another Member added that he felt that there needed to be a substantial and genuine effort to market and retain existing office space and that the wording around this should be more robust, particularly if there was to be a move from an 18 to a 12 month marketing period as proposed.

Officers undertook to look into this matter further on the back of Members comments and to then report back further to the Sub Committee in due course.

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

C3 Hotels

Officers reported that there had been a major growth in hotels in the City within the last 15/20 years. The City's current approach to this was relatively neutral with assessments carried out on a site by site basis. It was felt that this continued to be generally the right approach. Members were informed that some surrounding boroughs were looking to be more restrictive. There was, however, generally a feeling that we might look to promote more hotels given the cultural offerings in certain parts of the City – this was an argument put forward by the CPA. It was recognised that where a hotel was looking to occupy an existing office building (which tended to be the case) balance was needed and there may be opportunities for some mixed office/hotel use.

The Deputy Chairman questioned the importance of the growth related to the Culture Mile on this policy and how Officers intended to measure what this might look like. He also referred to the demand by businesses for hotels (bednights) and the need also for conference venues within the City. He questioned how this could be evidenced. He concluded by stating that he tended to be supportive to the call for more hotels in the City although recognised that these should not be situated in predominantly residential areas.

A Member questioned whether Officers had consulted the Cultural & Visitor Development Director in terms of demand for hotel space in the City. Officers confirmed that they had held discussions with him around this and had established that approximately 80% of the demand for hotels came from businesses as expected. The leisure element was, however, growing and some further work could be undertaken to look into this further.

A Member questioned whether any preference had been expressed in terms of hotel size, recognising that there were quite a few 20 bed hotels in the City. He questioned whether smaller venues such as these were to be encouraged. Officers reported that some hotels in London had now taken to occupying floors of existing office buildings which was another factor that could be taken into consideration going forward.

At present, Members were of the view that a neutral stance with each site considered on its merits was probably still the correct stance to adopt.

C4 Evening and night-time economy

Officers reported that responses from the Mayor on this matter were generally supportive. Some comments around a more restrictive approach and greater planning control over things such as dispersal routes and some design/management issues had been received.

The Deputy Chairman stated that there had been huge organic growth in this area in the City over the past 20 years which, to his mind, was part and parcel of becoming a 24/7 city – something that was vital in order to remain globally competitive. He agreed that this needed adequate monitoring but stated that he felt that the City could endure more growth yet in terms of evening and night-time economy without being saturated.

Another Member referred to a recent speech by the Mayor's night-time tsar at which she had made clear that the night-time economy involved offerings from 6pm-6am. He added that he felt that the City's night-time economy was now relatively vibrant and that this should be allowed to continue ensuring that there was sufficient and appropriate crossover with licencing.

A Member, who also currently sat on the Licensing Committee, stated that it was clear that the night-time economy in the City had evolved organically but was more prolific in certain areas which had also led to policing issues. He added that he felt that care therefore needed to be taken, from a planning perspective, to not exasperate these issues. He suggested that police input on this policy should therefore also be sought.

Strategic Policy S9: Vehicular Transport and Servicing

S9 freight and servicing

Officers reported that comments from industry as to the low threshold for physical consolidation had been received. The Chair stated that any movement up from this should not in any way weaken the policy given that the Transport

Strategy very clearly set out that the desire was for consolidation to be the norm going forward.

A Member questioned what was meant by other forms of consolidation and virtual consolidation. Officers reported that this could be things such as using joint suppliers and that virtual consolidation could be considered as an alternative to physical consolidation.

A Member objected to this and stated that he felt that virtual consolidation was not consolidation at all and was, at best, a small efficiency. He clarified that he was very sceptical as to the merits of this and was not personally aware of this happening in any multi-tenanted buildings at present.

Officers undertook to take this matter back and report further to the Sub Committee in due course.

A Member questioned why responses objecting to weekend deliveries in certain areas had been forthcoming given that, if these were timed correctly, there tended to be no particular noise issues associated with these.

A Member spoke of future proofing the plan and referencing, for example, the use of drone deliveries and allocated rooftop space for these within the City. Officers stated that they would look to reference that possibility within the draft Plan.

Strategic Policy S12: Tall Buildings

S12 definition and location of tall buildings

Officers highlighted that this matter was closely related to that on protected views. At present tall buildings within the City were defined as those over 75m. It was felt that this threshold was reasonable and was higher than other surrounding boroughs. There were, however, lower thresholds for riverside developments which were currently capped at 25m.

S12 public space and tall buildings

Members were in favour of greater flexibility in terms of a wider range of potential public uses going forward although they emphasised that all new tall buildings should provide some public space.

A Member questioned how public realm at ground floor level might be more actively encouraged.

Strategic Policy S21: City Cluster

Officers reported that a mix of views as to whether the indicative boundary should be extended or made more precise had been received. Comments around what was being done at street level to manage intensification here had also been received with the general consensus being that this should not be overly prescriptive.

A Member was concerned that the Plan seemed to ignore the fact that the majority of workers within the City Cluster used London Liverpool Street station which was not included in this key area of change. He added that footfall here was vital. Officers reported that the station was incorporated within a separate area but that the relationship between this and the City Cluster could be clearly highlighted within the Plan going forward in order to raise its profile.

Strategic Policies S23: Smithfield and Barbican; S24 Culture Mile Implementation; and S25 Smithfield

Officers reported that there was a call from some for the Plan to emphasise that there were cultural offerings elsewhere in the City beyond the Culture Mile.

Comments were also received around the need for the Plan to provide greater clarity around the future use of Smithfield Market. Officers were of the view that whilst some options could be explained, the policy should not be prescriptive at such an early stage. A Member agreed that it was too early to comment on this in any detail at this stage and that any wording in the Plan should be tentative. He added that the public realm around this site would also be very important and reference to this should also feature in the Plan.

Members were also of the view that it would be helpful to add further supporting text to the Plan to reassure residents that major projects will be required to undertake detailed assessment of issues such as noise and pedestrian flow and to identify appropriate mitigation of any adverse impacts.

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 3.31 pm

Chairman

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

This page is intentionally left blank

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 14/01/2020
Subject: City of London Local Plan Review: Proposed Submission version of City Plan 2036	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
Report author: Adrian Roche, Department of the Built Environment	

Summary

The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. During the summer this Sub-Committee considered the main issues raised during the consultation and gave a steer to officers on the way forward in relation to a number of key strategic topics. Officers have now drafted a revised version of the Plan, known as the Proposed Submission City Plan 2036, which will be subject to a further final round of public consultation during 2020 before being submitted to the Secretary of State for examination.

This report highlights the main changes that are proposed to the earlier November 2018 draft Plan and includes a full schedule of changes covering all the citywide policies. Proposed changes to the area-based policies will be presented to the Sub-Committee in February. Many of the changes have arisen in response to comments received during the public consultation, but some have been included to reflect changes to the emerging London Plan or to national guidance since the draft Plan was published. In addition, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.

Members are asked to agree that the sections of the Proposed Submission City Plan 2036 set out in this report can go forward to the Grand Committee for consideration in March.

Recommendation

Members are recommended to:

- Agree the sections of the Proposed Submission City Plan 2036 set out at Appendix 1 of this report; and
- Authorise the Director of the Built Environment to make further minor editorial changes and non-material additions to the Proposed Submission City Plan 2036 as necessary prior to its consideration by Planning and Transportation Committee.

Main Report

Background

1. The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. Approximately 900 written comments were received from 180 respondents, along with informal comments collected at workshops and meetings. A summary of each of the written comments received is available on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
2. This Sub-Committee met on 17th May 2019 to consider the main themes raised during the consultation and on 19th July 2019 to consider strategic issues and potential Plan changes. The July meeting focused on those issues where consultation responses suggested either a significant change in policy approach or identified a policy conflict. Members considered potential options for each of those issues and provided officers with a steer on the appropriate way forward.
3. During the autumn, officers have drafted changes to the Plan in response to comments received during the public consultation and reflecting the steer provided by this Sub-Committee. In addition, officers have had regard to recent extensive updates to national planning practice guidance and to publication of the Mayor's final proposed changes to the London Plan in December following receipt of the Examination in Public Panel Report in October. None of the changes made to the London Plan by the Mayor have fundamentally altered the strategic context for the City of London and while it is possible that the Secretary of State could make further changes, it is considered that there is now sufficient certainty about the likely content of the new London Plan to be able to progress the City's Local Plan towards submission and examination.

Proposed Submission City Plan 2036

4. Attached at Appendix 1 of this report are Sections 1-6 of the Proposed Submission version of City Plan 2036, covering the introductory text, the vision, objectives and spatial strategy, and the citywide policies grouped by topic. The final sections of the Plan, covering the Key Areas of Change and Implementation, will be presented to the Sub-Committee in February.
5. The document at Appendix 1 identifies the changes to the draft Plan, with deletions shown in crossed out bold text and additions in bold underlined text, to enable Members to easily identify where changes have been made and to focus discussion on those changes. As well as responding to consultation comments, national planning guidance and the emerging London Plan, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.
6. Given the large number of detailed changes outlined in Appendix 1, it is anticipated that it will take more than one meeting for the Sub-Committee to

consider those changes. Further meetings have therefore been arranged on the 3rd February and the 10th February. Officers felt, however, that it would be helpful to present the Sub-Committee with all the citywide policies at the same time so that Members can see how the policies fit together.

7. Copies of updated maps and diagrams in the draft Plan will be tabled at the meeting.

Key Changes

8. The main changes proposed compared to the November 2018 draft Plan are summarised below, in Plan order:
 - The addition of a section addressing what happens if things change within the introduction.
 - The addition of a spatial strategy to link the vision and strategic objectives to the Key Diagram and the detailed policies.
 - Further strengthening of the air quality policy to reflect the City Corporation's new Air Quality Strategy and changes to the London Plan.
 - A new policy on Health Impact Assessments to embed the consideration of health impacts within the planning process.
 - A commitment to deliver 50% affordable housing on public sector land in accordance with the London Plan policy approach.
 - The addition of a requirement for major development to include Cultural Strategies to help enrich and enhance the City's cultural offer.
 - Greater emphasis on the use of 3D modelling technology to assist in the determination of planning applications.
 - Differentiation between the policy approach to designated and non-designated heritage assets.
 - Refinements to the policies on tall buildings and protected views, including recognition that the background to the Tower of London on the eastern fringe of the City is an area inappropriate for tall buildings.
 - A new policy on trees, which was an omission from the draft Plan.
9. Changes to the Safe and Secure City policies are being considered by the Senior Security Board and will be brought to the Sub-Committee when available.
10. Officers consider that the changes set out in Appendix 1 have improved the Plan and are confident that the Proposed Submission version of the Plan will be a robust document that meets the relevant legal and soundness tests. Nonetheless, there are some potential risks and challenges at the examination stage and officers will outline those to Members orally at the meeting.

Minor editorial changes

11. Given the size and scope of the Proposed Submission City Plan 2036, some further editing may be undertaken before it is considered by the Grand

Committee. This includes further proof-reading to correct any typographical errors and reduce duplication, updating of the infographics and refinements to maps and illustrations. Members are asked to authorise the Director of the Built Environment to make these further minor editorial and non-material changes prior to consideration by the Grand Committee.

12. In addition, the Plan will be professionally designed prior to the start of public consultation and will be accompanied by a range of supporting material to explain the policies and proposals in more detail.

Evidence base

13. The Proposed Submission City Plan 2036 has been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. 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 to support the Proposed Submission Plan including an Infrastructure Delivery Plan, which identifies the infrastructure required to deliver the Local Plan and examines where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Another key piece of evidence is an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile. This viability assessment will include an assessment of the scope for increasing the financial contribution to affordable housing and the future scope for updating the City's Community Infrastructure Levy. These documents will be available for Members to read when the Plan is considered by the Grand Committee.
15. Statements of Common Ground (SoCGs) are being prepared to document how the City Corporation is cooperating with neighbouring boroughs and other key partners under the Duty to Cooperate. At the time of writing, SoCGs have been agreed with Islington, Westminster, Lambeth and Southwark, with others to follow in the early part of 2020.

Integrated Impact Assessment

16. The Proposed Submission City Plan 2036 is being informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.

17. The IIA is produced in-house but is being independently audited by consultants. It will be available for Members to read when the Plan is considered by the Grand Committee.

Next steps

18. Once the Sub-Committee has completed its consideration of the revised Plan, it will be presented to the Grand Committee, Policy and Resources Committee and Court of Common Council for approval. The current target dates for Committee approval are:
- Planning & Transportation Committee on 10/03/2020
 - Policy & Resources Committee on 19/03/2020
 - Court of Common Council on 23/04/2020
19. If the above timescales are met the Proposed Submission City Plan 2036 will be published in May 2020 for a further final six-week public consultation, which is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. The Plan will then be submitted to the Secretary of State for Housing, Communities and Local Government, along with its supporting evidence base and the representations received. The Secretary of State will appoint an Inspector to examine the soundness of the Plan. The Inspector will hold hearings and will subsequently issue a report to the City Corporation, which may include recommended modifications. Assuming the Inspector finds the Plan sound, it is expected to be adopted formally in 2021.

Corporate & Strategic Implications

20. 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 key corporate capital projects, along with proposals to ensure a sufficient supply of business space to meet future needs. The emerging Plan aligns with the adopted Transport Strategy.

Appendices

- Appendix 1 – Track changes version of the Proposed Submission City Plan 2036 (sections 1-6 which excludes the Key Areas of Change and Implementation sections)

Background Papers

None

Adrian Roche

Development Plans Team Leader

T: 020 7332 1846

E: adrian.roche@cityoflondon.gov.uk

This page is intentionally left blank

City Plan 2036
Shaping the Future City
City of London Local Plan
Proposed Submission Draft

Foreword

1. INTRODUCTION	5
1.1. WHAT IS THE LOCAL PLAN?	5
1.2. WHY IS THE CITY PREPARING A NEW LOCAL PLAN?	5
1.3. THE STAGES OF PREPARING THE LOCAL PLAN	5
1.4. STRUCTURE OF THE DRAFT PLAN	13
2. THE CITY TODAY -TO BE UPDATED	15
16	
3. CITY PLAN 2036: DRAFT VISION, AND STRATEGIC OBJECTIVES AND SPATIAL STRATEGY	17
3.1. CONTRIBUTE TO A FLOURISHING SOCIETY	17
3.2. SUPPORT A THRIVING ECONOMY	18
3.3. SHAPE OUTSTANDING ENVIRONMENTS	19
3.4. KEY AREAS OF CHANGE	20
3.5. THE SPATIAL STRATEGY	23
4. CONTRIBUTE TO A FLOURISHING SOCIETY	26
4.1. HEALTHY AND INCLUSIVE CITY	26
4.2. SAFE AND SECURE CITY – THIS SECTION TO BE UPDATED FOLLOWING DISCUSSIONS WITH IAN HUGHES AND SECURITY BOARD	45
4.3. HOUSING	51
5. SUPPORT A THRIVING ECONOMY	67
5.1. OFFICES	67
5.2. RETAILING	74
5.3. CULTURE, VISITORS AND THE NIGHT-TIME ECONOMY	83
5.4. SMART INFRASTRUCTURE AND UTILITIES	95
6. SHAPE OUTSTANDING ENVIRONMENTS	100
6.1. DESIGN	100
6.2. VEHICULAR TRANSPORT AND SERVICING	119
6.3. WALKING, CYCLING AND HEALTHY STREETS	130
6.4. HISTORIC ENVIRONMENT	140
6.5. TALL BUILDINGS AND PROTECTED VIEWS	147
6.6. OPEN SPACES AND GREEN INFRASTRUCTURE	154
6.7. CLIMATE RESILIENCE AND FLOOD RISK	164
6.8. CIRCULAR ECONOMY AND WASTE	174
7. KEY AREAS OF CHANGE	181
INSERT DIAGRAM FOR THAMES POLICY AREA	181
7.2. THAMES POLICY AREA	181
7.3. BLACKFRIARS KEY AREA OF CHANGE	181
7.4. POOL OF LONDON KEY AREA OF CHANGE	181
7.5. ALDGATE AND TOWER KEY AREA OF CHANGE	181
7.6. CITY CLUSTER KEY AREA OF CHANGE	181
7.7. FLEET STREET AND LUDGATE KEY AREA OF CHANGE	181
7.8. SMITHFIELD AND BARBICAN KEY AREA OF CHANGE	181
7.9. LIVERPOOL STREET KEY AREA OF CHANGE	181
8. IMPLEMENTATION	181
8.1. PLANNING CONTRIBUTIONS	181
APPENDICES AND GLOSSARY	181
APPENDIX 1 - TECHNICAL NOTE ON APPLYING THE URBAN GREENING FACTOR	181
APPENDIX 2 - HE ADVICE NOTE 7 SELECTION CRITERIA	181

GLOSSARY	181
----------------	-----

1. Introduction

1.1. What is the Local Plan?

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

1.2. Why is the City preparing a new Local Plan?

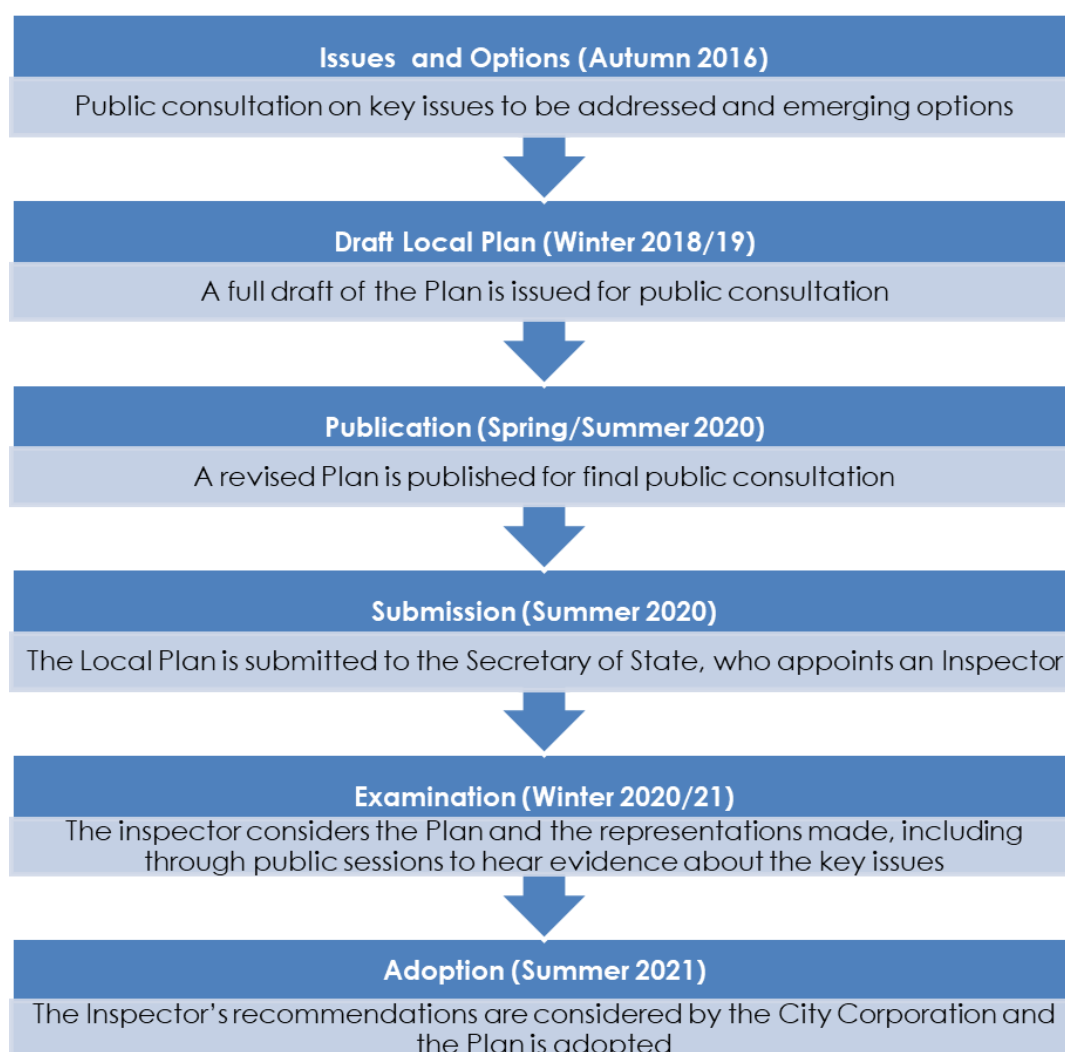
- 1.2.1. The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look.
- 1.2.2. Local Plans are required to look ahead over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. However, they must also be reviewed at least every five years to take account of changing circumstances affecting the area, or any relevant changes in national policy.
- 1.2.3. Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system and some policies need updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London ~~is reviewing the~~ **has adopted a revised** London Plan ~~and has published a draft London Plan, which will be the subject of an Examination-in-Public during the first half of 2019, which provides a strategic planning framework for London for the period up to 2041.~~
- 1.2.4. By preparing a new Local Plan covering the period to 2036, the City Corporation will be able to address revised national and London Plan policy, whilst maintaining a positive planning framework to meet the City's long-term needs.

1.3. The stages of preparing the Local Plan

- 1.3.1. The **Proposed Submission** draft Local Plan, titled City Plan 2036 (the 'Plan'), is the **second third** stage of preparing a new local plan. The first stage of the process was the Issues and Options stage **in 2016**, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered to address them. **The second stage, the draft Local Plan in 2018/19, was a consultation on a full draft Plan.**

1.3.2. Since then, the City Corporation has analysed the consultation findings and undertaken further evidence gathering to **inform prepare the final stage, the Proposed Submission draft Plan.**

1.3.3. ~~This draft Plan is being published for an extended period of public consultation. All comments received during the consultation period will be considered and changes made to the Plan as appropriate. A final version of City Plan 2036 will then be published for a further round of consultation in autumn 2019, following which~~ **Following consultation on the Proposed Submission Plan, it the Plan** will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan **later in 2020. The Local Plan which** is expected to be adopted in **2020/2021**.



1.3.4.

Figure 1: illustrates the stages in the preparation of City Plan 2036, together with an indicative timescale. ~~This timetable may be influenced by external factors, including further national changes to the planning system and the progress of the London Plan review.~~

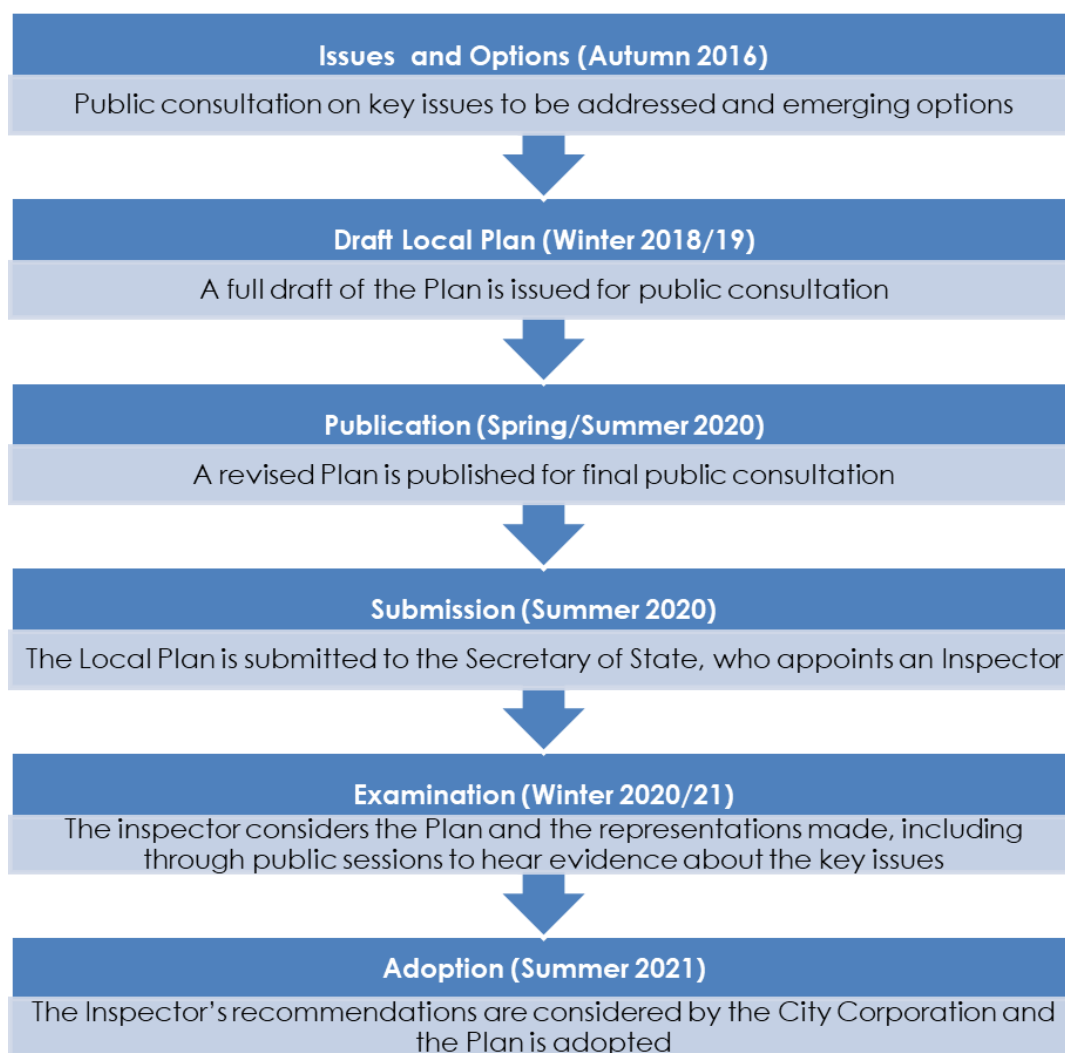


Figure 1: The main stages of preparing the new Local Plan

Policy context

1.3.6. As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on international and national economic considerations and other external policies, particularly the terms of the United Kingdom's exit from the European Union and its future trading relationship with the European Union and the rest of the world. Within this wider framework, the Local Plan can provide an environment which encourages appropriate development and is responsive and adaptable to change.

1.3.7. The Local Plan is influenced by national and London-wide planning policies and guidance, as well as plans and strategies produced by neighbouring boroughs and a range of statutory bodies.

National planning policy and guidance

1.3.8. Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and

establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.

The London Plan and other Mayoral strategies

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

Neighbourhood Plans

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

Duty to co-operate

- 1.3.13. Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires local planning authorities to engage "constructively, actively and on an ongoing basis" on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.
- 1.3.14. The City Corporation already works closely and co-operates with its neighbouring boroughs, the Mayor of London and other partners on strategic and cross boundary planning issues. **National planning policy requires The revised NPPF published in July 2018 introduced a requirement for** strategic policy-making authorities to prepare and maintain statements of common ground to demonstrate effective and ongoing joint working. The City Corporation **will is liaise liaising** with the Mayor of London, neighbouring boroughs and other duty to co-operate partners to agree **how the** statements of common ground **will work in London given the Mayor's role and will prepare one or more such**

statements in advance of submitting City Plan 2036 to the Secretary of State to support the development of City Plan 2036 and the local plans and strategies of partners.



Figure 2: Strategic context: The City of London's location within the Central Activities Zone

City Corporation strategies

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

space. Reflecting this interrelationship, relevant policies and proposals in the **draft** Transport Strategy and in ~~the draft~~ City Plan 2036 are aligned.

Evidence base

1.3.18. The policies in ~~the draft~~ City Plan 2036 have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. In some cases, additional studies have been undertaken to provide relevant and up-to-date evidence to support and justify the proposed policies. The evidence that underpins the draft Plan has been published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036. **This includes an assessment of the combined effects of the policies in City Plan 2036 on the overall viability of development in the Square Mile and the viability of delivering the Plan's affordable housing targets.**

~~1.3.19. Further evidence will be gathered, and existing evidence updated where necessary, before publication and submission of the revised Plan in autumn 2019. This will include an assessment of the combined effects of the policies in City Plan 2036 on the overall viability of development in the Square Mile and the viability of delivering the Plan's affordable housing targets.~~

Integrated Impact Assessment

1.3.20. ~~The draft~~ City Plan 2036 has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:

- Sustainability Appraisal, including a Strategic Environmental Assessment;
- **Equalities Impact Assessment Equality Analysis;**
- Health Impact Assessment.

1.3.21. The IIA is an integral part of the plan making process and has assessed draft policy options in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. IIA is an iterative process and further assessment will be undertaken on changes **made** to the Plan **following consultation on the draft as a result of pre-submission consultation or modifications proposed through the Examination process.**

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

Other planning documents

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

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

Implementation and delivery

- 1.3.24. Implementation of the ~~new~~ Local Plan, ~~when adopted~~, will require partnership working and co-operation with a range of organisations, including developers, businesses, residents, community and amenity groups, transport and service providers, the Mayor of London and neighbouring boroughs.
- 1.3.25. A key mechanism for implementing the Local Plan is the consideration of planning applications through the development management process. **Policies in this Plan apply to all development, including major new development, extensions to existing buildings, other major refurbishments and minor development, unless otherwise specified in individual policies.** The Local Plan should be read as a whole and applications for planning permission will be considered against all relevant policies in the Local Plan, the London Plan ~~and~~ the **NPPF and any future neighbourhood plans.**
- 1.3.26. The City Corporation will work closely with developers, occupiers and residents to ensure that the City Plan 2036 is implemented and delivers positive improvements across the City. Where necessary, the City Corporation will use its powers of enforcement to ensure compliance with, and effective implementation of, Local Plan objectives and policies. The City Corporation’s Enforcement Plan has been adopted as a Supplementary Planning Document and sets out the principles and procedures that will be followed to ensure development is effectively regulated. ~~The Plan contains standards and targets and, where possible, the City Corporation will seek resolution without recourse to formal enforcement action. However, w~~ Where necessary, enforcement action will be taken. The Enforcement Plan will be kept under review and amended to reflect new provisions arising out of changes to national, London-wide or local policy and/or practice and experience in implementation.

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

What if things change?

1.3.28. **The Local Plan was prepared in the context of the most up to date information available. A range of projections and potential future scenarios were considered for each policy area. However, unforeseen events may prompt a need to review some or all of the policies. The City Corporation will update the evidence supporting this Plan and the Infrastructure Delivery Plan and monitor progress towards meeting the Local Plan's strategic objectives and policies. Key areas where changing trends, legislation or unforeseen events may result in a need to amend policy include:**

- **Changing economic circumstances which impact on projected levels of office and employment growth;**
- **Changing projections of population growth and housing need and affordability;**
- **Significant under-delivery, or over-delivery, against the Plan's employment or housing targets;**
- **Changing evidence on the impacts of climate change, air quality and other pollution;**
- **Changing technology impacting in particular on transportation and ways of working;**
- **The national, London and City specific security context;**
- **The availability of funding for the delivery of necessary infrastructure; and**
- **Changes in legislative requirements, national or London-wide policy and guidance.**

1.4. Structure of the Draft Plan

1.4.1. The structure of ~~the draft~~ City Plan 2036 is based on the three strategic aims of the Corporate Plan, which are to:

- Contribute to a flourishing society;
- Support a thriving economy; and
- Shape outstanding environments.

1.4.2. Individual policy topics are grouped within these broad themes. The first policy under each topic is a Strategic Policy, which addresses the strategic context, the relationship with other plans and strategies, and key planning issues. These policies are followed by Development Management Policies that will be used alongside the Strategic Policies in the consideration of applications for planning permission and related consents.

1.4.3. A fourth theme of Key Areas of Change has been added to provide a framework for the area-specific policies within the Local Plan, and a fifth theme of Implementation has been added to focus on how the Plan will be delivered.

1.4.4. The structure of the ~~draft~~ Plan is shown diagrammatically in Figure 3: Structure of draft City Plan 2036 and is not intended to represent any form of hierarchy.

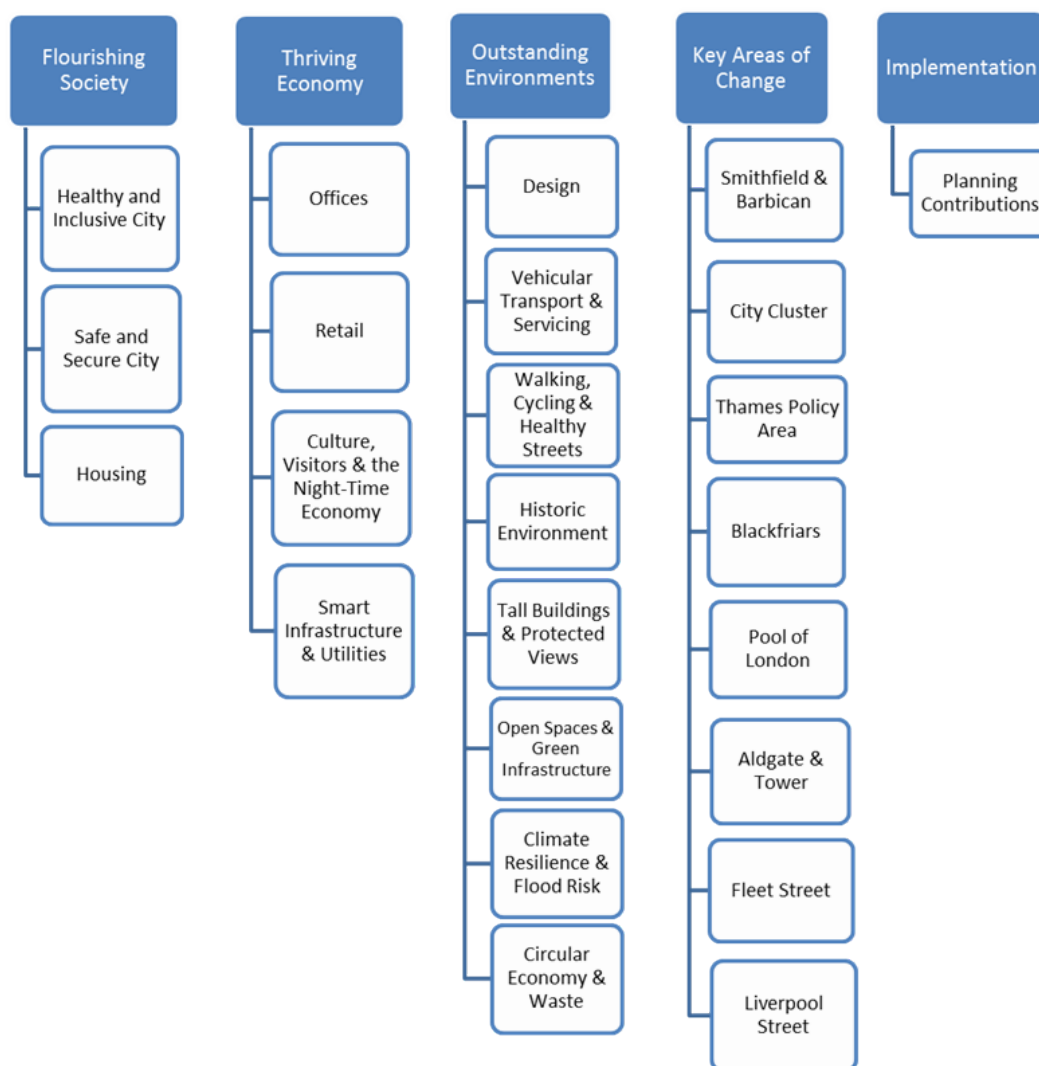


Figure 3: Structure of draft City Plan 2036 AMEND DIAGRAM TO REFLECT CHANGES IN POLICY NAMES AND ORDERING

2. The City Today -to be updated

City employment in 2016

483,000



98%

*of businesses
employ under
250 people*

Number of businesses 2016

17,980



7,400



Residential population



18.4m

*business and leisure
visitors to the City in 2017*

7,100



Total residential units

28%



*of residential units
registered as
second homes*



600+

Listed Buildings



5,712

Number of hotel bedrooms

*Number of hotel bedrooms
under construction*



2,333

27

Conservation Areas



8,820,000m²

*Total
office
floorspace*

1,479,000m²

*Total office
floorspace under
construction*

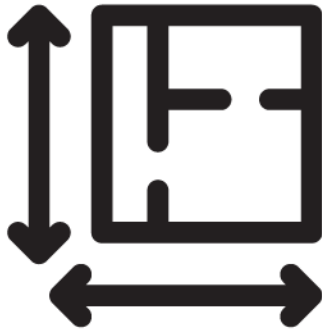


632,000m²

*Total office
floorspace under
construction in
City Cluster*

578,600m²

Total retail floorspace



**33.05 Hectares
of open space**



*Total green roof
space in the City:*

43,100m²



Number of retail units

1,899



14



tall buildings in the planning pipeline



75%

*office permissions since 2014
BREEAM rated 'Excellent'*

10



in City Cluster

*Number of tall buildings
over 75m*



53

3. ~~City Plan 2036: draft~~ Vision, and Strategic Objectives and Spatial Strategy

3.1. Contribute to a Flourishing Society

The Vision....

- 3.1.1. The needs of the City's diverse communities will be met in a sustainable and inclusive way, addressing the health, employment, education, leisure and housing needs of the variety of people who work, live and visit the City.
- 3.1.2. The City's population will enjoy good health and wellbeing. Health inequality across the City will be reduced. Workers and residents will have access to a range of health services within the Square Mile and beyond. Partnership working with businesses and organisations both inside and outside the City will effectively tackle the wider causes of poor health by substantially improving the City's air quality, promoting the recreational benefits of a healthy lifestyle, and ensuring inclusive access to good quality open spaces and recreational opportunities.
- 3.1.3. The City will have a network of high quality social and community facilities in accessible locations to foster cohesive and healthy communities. Links with neighbouring boroughs will be strengthened and closer co-operation will provide a stronger sense of community and more efficient services.
- 3.1.4. There will be a mix of housing, located in or near identified residential clusters, providing a high-quality living environment consistent with a city centre location. Housing will not be appropriate where it would conflict with the City's global business role or result in poor residential amenity. Affordable housing will be required on-site within the City. Where off-site contributions are exceptionally allowed, they will be used to deliver ~~to~~ new affordable housing within and outside of the City, principally on the City's managed housing estates, contributing to meeting London's wider housing needs.
- 3.1.5. The City will remain a safe place to work, live and visit. Security measures will be designed into new buildings and public spaces, whilst ensuring that the City's streets, walkways and open spaces are welcoming and inclusive. Where necessary, an area-wide approach to delivering collective security will be sought.
- 3.1.6. Good building design and effective management of night time entertainment, combined with a broad mix of uses, will reduce the potential for anti-social behaviour, adverse impacts on residents and will help to maintain residential amenity.

3.1.7. The City **Corporation** will work with partners to ensure that high quality training and learning **facilities opportunities are accessible to all and that** the City's higher education institutions continue to enjoy an international reputation for excellence. City residents and those in neighbouring boroughs will develop the skills needed to enter careers in the City and benefit from the City's prosperity. The City will offer equality of opportunity, accessibility and involvement so that people from across London's diverse communities will have the chance to benefit from the many opportunities and facilities it offers.

Strategic Objective:

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

3.2. Support a Thriving Economy

The Vision....

3.2.1. The City will remain the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas, including in the technology and creative sectors, and delivering inclusive and sustainable growth and prosperity for its communities, London and the UK.

3.2.2. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.

3.2.3. The City will be open to new business, new ideas and new ways of working, reflected in **office** floorspace that is flexible and adaptable to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. Office space will be complemented by other commercial, cultural and leisure uses adding vibrancy and animation to the City's streets.

3.2.4. The number of business and tourist visits to the City will significantly increase as the City is recognised for its world-class cultural and creative facilities. Culture Mile will transform the north west of the City into a vibrant strategic cultural area of national and international stature.

3.2.5. The quality and quantity of retail facilities will continue to increase to meet rising demand, as the City evolves into an evening and 7-day a week retail, leisure and cultural destination. Retail growth will be focused on the traffic and environmental Centres of Cheapside, Liverpool Street/Moorgate, Leadenhall Market and Fleet Street. Smaller retail units will be provided across the City, animating ground floor spaces and meeting local worker and resident needs.

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

Strategic Objective:

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

3.3. Shape Outstanding Environments

The Vision....

3.3.1. The City will be physically well connected and responsive. Sustainable travel patterns and modes of transport will be promoted and public transport capacity increased, principally through the opening of the Elizabeth Line, and the Northern Line/Bank Station Upgrade.

3.3.2. The City's streets will provide an attractive and safe environment for walking and cycling. Traffic reduction and improvements to the City's streets and junctions will transform the safety, look and feel of the City's street network.

3.3.3. Partnership working with City businesses and developers will minimise the number of delivery and servicing trips into the City and will reduce congestion through consolidation and by re-timing trips to take place outside of peak hours. The majority of last mile deliveries will be undertaken by zero emission vehicles, and the City's air quality will significantly improve as a greater share of motorised traffic switches to electric or other zero emission modes.

3.3.4. Use of the River Thames by commuters and for freight and servicing will significantly increase as the Thames becomes a major corridor for the movement of people and the transport of materials including construction and deconstruction materials, waste, freight and general goods.

3.3.5. The City will remain a centre of world class architecture with flexible and adaptable buildings and a high quality of public realm for people to admire and enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline, adding to the tall building cluster in the east of the City.

3.3.6. The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where **required this is appropriate**, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, **backdrop and views** of St Paul's Cathedral and the Tower of London.

- 3.3.7. Buildings, streets and spaces will be inclusive, interesting, legible and fit for purpose. Computer modelling, simulation and smart technology will be used to ensure that new buildings, and the spaces between buildings, create an environment which attracts businesses and people from across the world.
- 3.3.8. The City's buildings, public realm and transport will be highly sustainable, designed to make efficient use of natural resources, minimise emissions and be resilient to natural and man-made threats. In partnership with public and private sector organisations the City will adopt new technologies to adapt **towards** a zero emission future by 2050.
- 3.3.9. The City will be a much greener place, with additional planting in and around new and existing buildings and spaces, enhancing the environment and mitigating the impacts of pollution. New open and amenity spaces will be created including through the creation of new pedestrian routes, accessible and permeable buildings, and the provision of amenity space at upper or roof levels. Public access to private open space will be encouraged. Biodiversity will be increased by the inclusion of wildlife-friendly features in new and existing open spaces and buildings.
- 3.3.10. The risk of flooding will be minimised by incorporating sustainable drainage into new developments and the public realm, alongside measures to reduce run-off and increase rain water recycling. The Thames Tideway Tunnel will be completed, greatly reducing storm discharges from the combined sewer system and improving the quality of the water in the River Thames.
- 3.3.11. The City will become a Zero Waste City as developers, businesses and residents adopt Circular Economy Principles and reduce the amount of waste they produce whilst keeping resources in use for as long as possible. More flexible building designs will reduce the need for redevelopment of outdated office stock. Walbrook Wharf will continue to provide a facility for transferring materials, including waste, by river barge, thereby reducing lorry traffic in the City and across London.

Strategic Objective:

- 3.3.12. To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets.

3.4. Key Areas of Change

The Vision....

Smithfield and Barbican

- 3.4.1. The Elizabeth Line will significantly enhance public transport accessibility in this part of the City. The Culture Mile initiative including relocation of the Museum of London to Smithfield and the possible development of a Centre for Music alongside the existing Barbican Centre will provide outstanding cultural facilities in landmark buildings. Beech Street will be transformed into a more

welcoming environment, with significantly improved air quality, and the Beech Street/Long Lane axis will be the focus for a variety of **retail units shops and restaurants**. The wider area will contain a broad mix of uses, including residential, office, retail, hotel, leisure and cultural, while temporary art and cultural installations will further animate the buildings and public realm. The growth of creative enterprise will be particularly supported in this area. The public realm will be enhanced with a distinctive look and feel, creating attractive streetscapes and vistas. Evening and night-time activities will expand and will be well-managed to protect residential amenity. Consolidation of the City Corporation's wholesale markets onto a single site **outside of the City** will potentially allow the re-use of Smithfield Meat Market for other uses compatible with its heritage status **and the City Corporation's ambitions for Culture Mile**. St Bartholomew's Hospital will **continue to operate as remain** a major centre of health excellence. The potential for conflict between vehicular access to commercial and residential uses and the increased numbers of pedestrians will be effectively managed.

City Cluster

3.4.2. Office and employment growth will be successfully accommodated by a cluster of dynamic, attractive, sustainably designed **and appropriately scaled** tall buildings, providing an iconic **image view** of the City and enhancing its role as a global hub for innovation in finance, professional services, commerce and culture. Complementary retail, leisure, cultural and educational facilities will support **the City's primary business function this primary focus on office floorspace**, principally through animating ground floor spaces. Additional greening will be provided within and on buildings and in the public realm and air quality improved. An area wide approach will be taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high-quality public realm and environment that reflects the status of the area. Freight and servicing deliveries will be reduced through off-site consolidation, the re-timing of deliveries outside of peak hours and joint working with occupiers. Pedestrian movement and permeability will be improved and priority given to pedestrians on key routes during daytime. Links to public transport nodes and other parts of the City, including to the Elizabeth Line at Liverpool Street Station, will be improved.

Aldgate and Tower

3.4.3. Partnership working with the London Borough of Tower Hamlets, businesses and residents will provide a framework for the delivery of improvements in this area. Redevelopment and refurbishment will enhance the appearance and vibrancy of this area, with a mix of offices, residential, retail, community and cultural facilities, catering for residents, workers, students and visitors. The open space at Aldgate Square will be the focal point of a high-quality public realm which provides better facilities for pedestrians and cyclists. Air quality will be improved particularly in proximity to St John Cass School and the Middlesex Street and Mansell Street residential estates. Pedestrian connections, permeability and wayfinding will be improved, especially through large development sites and between Aldgate and Tower Gateway. Joint working with

TfL and other transport operators will deliver improvements in public transport capacity to meet increasing demand. Residents will have improved access to education, health, training and job opportunities relevant to their needs.

Pool of London

- 3.4.4. ~~This area provides an iconic view of the City's riverside, with~~ There is an opportunity ~~for increased~~ to increase vibrancy and vitality in this area arising from through greater use of the riverside walk, more leisure, retail and cultural public uses at ground level and the provision of publicly accessible roof terraces and spaces. Servicing of individual buildings will be improved through the introduction of shared servicing bays and access points. The area will be regenerated through the redevelopment or refurbishment of appropriate riverside sites. The public realm and accessibility will be significantly improved, contributing to an improvement in air quality. A higher quality pedestrian route will be created between London Bridge and the Tower of London creating a continuous attractive riverside ~~park and~~ walkway free of motorised traffic. Easier pedestrian access across Lower Thames Street will encourage more City workers, residents and visitors to enjoy the riverside. **Significant improvements will be made to the environment and air quality along Lower Thames Street.**

Blackfriars

- 3.4.5. Redevelopment or refurbishment of existing buildings will provide new high-quality office and commercial accommodation with active ground floors **and** within an improved public realm and environment that better reflects the status of the City. Easier access to the riverside walk and a safer and more pleasant environment for all users, including pedestrians and cyclists, will be delivered. A new public open space at Blackfriars foreshore, created through the Thames Tideway project, will introduce greenery to the riverside and provide a place for relaxation and recreation.

Fleet Street and Ludgate

- 3.4.6. The role of Fleet Street as a centre for the judicial judiciary and related business in the City will be enhanced by the potential development of a new court building and City of London Police Station. Partnership working with TfL will deliver safety improvements to the junction at Ludgate Circus. The role of Ludgate Hill as the primary approach to St Paul's Cathedral will be enhanced. Existing office accommodation will be retained and improved to provide flexible floorspace and spaces to meet changing business needs. Public realm and transportation improvements will deliver a high quality environment which enhances the Principal Shopping Centre, the retail link and the historic lanes, alleyways, churchyards and spaces that lead off the processional route of Fleet Street and Ludgate Hill. Additional greening within the public realm and on buildings, where appropriate, will deliver visual improvements and improvements in air quality. ~~Where appropriate, r~~ Residential development will be concentrated in lanes within identified residential areas and alleyways away from Fleet Street and Ludgate Hill to ensure a higher quality residential environment for residents.

Liverpool Street

3.4.7. The area will be enhanced, taking advantage of improvements in public transport accessibility brought by the opening of the Elizabeth Line, and opportunities presented by the remodelling of **the Broadgate Estate**. Pedestrian routes will be enhanced, and active frontages provided at ground floor level to animate and add vibrancy to the area. Retail uses will be encouraged, and improvements delivered to the public realm around Liverpool Street Station. Additional greening will help to deliver air quality **and biodiversity** improvements. Office use will continue to be the predominant use but will provide more flexible and collaborative space to meet the needs of potential start-ups and allow for business growth. Collaborative working between businesses in this area, Tech City and creative industries within Culture Mile will create an attractive and vibrant business eco-system.

Strategic Objective:

3.4.8. To ensure that the challenges facing the Key Areas of Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres.

3.5. The Spatial Strategy

3.5.1. **To deliver the City Corporation's Vision and Strategic Objectives, a balance needs to be struck between the competing demands for further commercial and office growth, the rapidly growing workforce, the growing cultural and visitor economies and the needs and expectations of the City's permanent residential population. An overarching imperative is to ensure that the City of London transitions to a zero carbon and zero emission City as soon as possible, improving air quality and delivering additional greening to the City's buildings and spaces.**

3.5.2. **The City Plan 2036 Spatial Strategy and the detailed policies that follow set out how this balance will be delivered and how the City of London will become a healthy and inclusive City for all.**

Spatial Strategy

The City Corporation will facilitate a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK, by:

1. **Delivering a minimum of 2 million m² net additional office floorspace and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone;**
2. **Broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of**

businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses;

- 3. Supporting the development of cultural facilities and uses and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative;**
- 4. Delivering an annual average of 146 additional homes within the City to meet housing need and continuing to deliver new housing on City Corporation estates outside of the City;**
- 5. Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site;**
- 6. Encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres;**
- 7. Identifying seven Key Areas of Change where significant change is expected in the period to 2036 and providing a policy framework to guide sustainable change in those areas;**
- 8. Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City, delivering further urban greening and improving air quality;**
- 9. Balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces;**
- 10. Ensuring that development and infrastructure provision are compatible with the radical transformation of the City's streets proposed in the City's Transport Strategy;**
- 11. Promoting greater use of the River Thames, regenerating and enhancing the City's riverside and reducing the risk of flooding.**

The spatial strategy is illustrated indicatively on the Key Diagram and in other figures and diagrams used in this Plan.

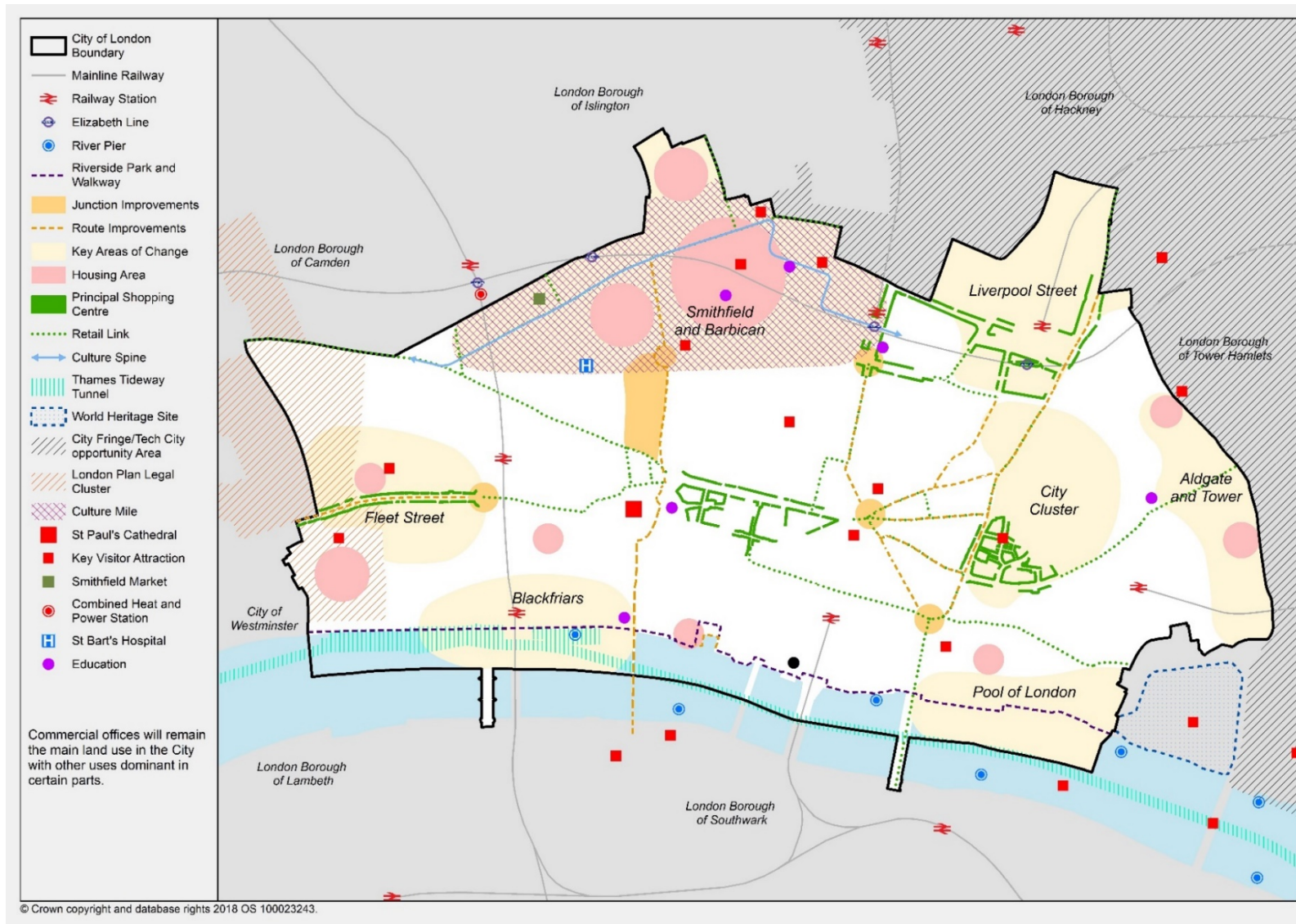


Figure 4: Key Diagram -TO BE UPDATED

4. Contribute to a Flourishing Society

4.1. Healthy and Inclusive City

Context

- 4.1.1. The City of London is a very densely built up area with a large daytime population and limited open space. The City's economic success means there is a high level of construction activity, while the density of development and employment, delivery and servicing requirements and the narrowness of many of the City's streets all contribute to traffic congestion. This can result in poor air quality, noise and light pollution and a shortage of adequate open spaces, play and recreational spaces, impacting on the health of residents, workers and visitors.
- 4.1.2. The NPPF and the London Plan stress the importance of health and wellbeing and the role that the planning system can play in improving this. Planning can support strategies to improve health and cultural wellbeing and promote healthy communities. Planning decisions can have an influence on people's health, particularly through the design and management of new development.
- 4.1.3. The City Corporation is committed to enabling an inclusive environment in which nobody is disadvantaged. Everyone should have equal opportunities to access buildings, spaces, job and training opportunities and health, leisure and educational services. An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions **or impaired mobility** and people who do not consider themselves disabled. An inclusive City allows all communities, irrespective of their social and economic position, to equally access the opportunities the City offers.
- 4.1.4. An important element of this commitment is breaking down unnecessary physical barriers and exclusions ~~imposed on disabled people and others by arising from the~~ poor design of buildings and spaces. The needs of disabled people should be considered at an early stage of the planning process and not considered separately from the needs of others.
- 4.1.5. A wide range of elements contribute to a healthy and inclusive environment. The transport and design policies in this Plan address relevant issues such as: **Healthy Streets**, active travel and permeability; inclusive transport; mitigating the impacts of pollution through the design of streets and public spaces; and providing adequate shade and shelter. **Green infrastructure policies highlight the benefits to health and wellbeing of open spaces and greenery within the urban environment.**

Strategic Policy S1: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment in the City and enable all communities to access a wide range of health, education, recreation and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments ~~on major~~ **of different levels depending on the scale and impact of the** development proposals;
4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of ~~those with disabilities or mobility impairment~~ **disabled people, older people and people with young children;**
5. Expecting **developers and** development to:
 - engage with neighbours before and during construction to minimise adverse **amenity** impacts;
 - promote healthy buildings and the **use of relevant standards that measure health and well-being in buildings** **Well Building Standard;**
 - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
 - respect the City's quieter **places and spaces** **areas;**
 - limit ~~the City's contribution to~~ unnecessary light spillage and 'sky glow'
 - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment.
6. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing City schools, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;
7. Encouraging the further provision of both public and private health facilities;
8. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
9. **Supporting facilities for the provision and improvement of** ~~Providing and improving~~ social and educational services through the City's libraries;
10. Supporting nursery provision and additional childcare facilities ~~where a need exists;~~

11. Protecting and enhancing existing community facilities and providing new facilities where required; and
12. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further **publicly accessible** facilities, ~~including publicly accessible facilities~~, within major developments **and public realm improvements**.

Reason for the policy

- 4.1.6. The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:
 - Good mental health for all;
 - A healthy urban environment;
 - Effective health and social care integration;
 - All children have the best start in life; and
 - Promoting healthy behaviours.
- 4.1.7. ~~The second of these priorities is the most relevant to t~~The Local Plan **has a particular role in delivering a healthy urban environment**, as it ~~includes can~~ **address** issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. The Joint Health and Wellbeing Strategy notes there is strong evidence that the environment shapes **wider** health outcomes and it seeks to ensure health and wellbeing issues are embedded into the Local Plan and major planning applications.
- 4.1.8. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.
- 4.1.9. The small permanent residential population in the City means that it is often not economic to deliver effective services **located** within the City **for City residents**. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. For example, the City Corporation is working jointly with Islington to deliver the City of London Primary Academy Islington on a site which crosses the City/Islington ~~border boundary~~. **The City Corporation will work with the City and Hackney Clinical Commissioning Group and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.**

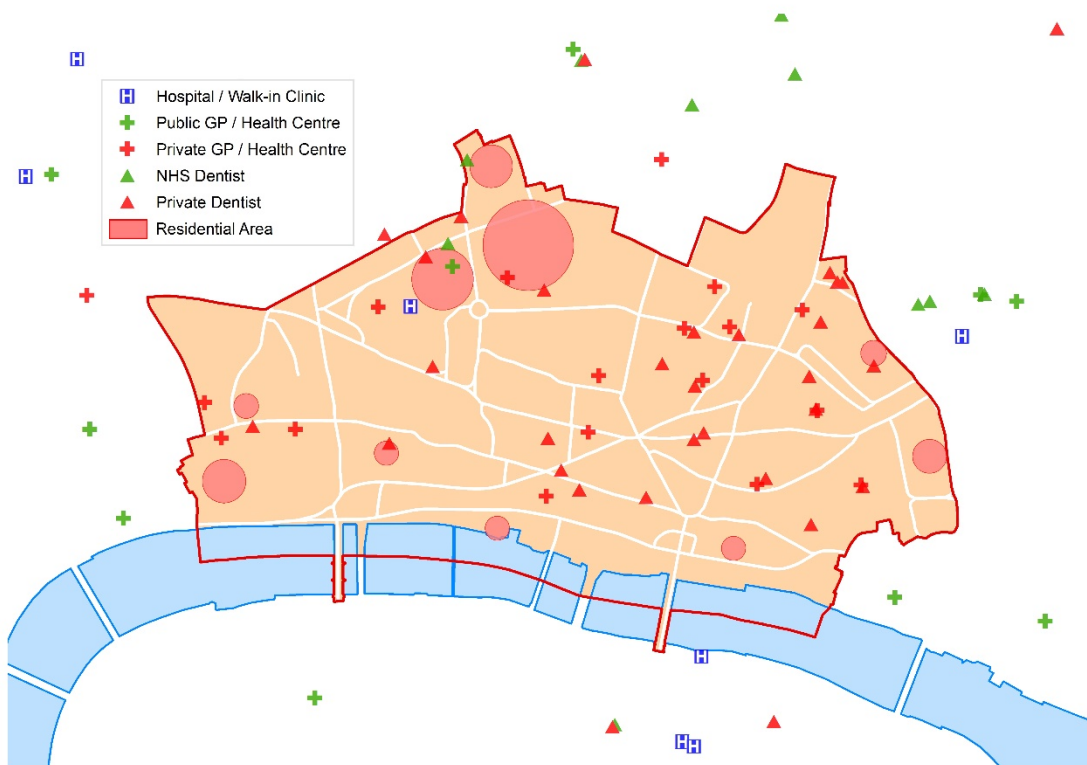


Figure 5: Distribution of health facilities in and adjoining the City

- 4.1.10. The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.
- 4.1.11. Advances in technology and an awareness of how office environments can impact people's mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.
- 4.1.12. Outdoor spaces and the public realm are under increasing pressure to provide places for **relaxation, amenity and** flexible working **~~whilst also providing for relaxation and amenity~~**. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels.

4.1.13. The location and nature of the City means that ~~quieter areas, such as churchyards and open spaces, in the City cannot reasonably be expected to be as quiet as similar areas in suburban locations. Nonetheless,~~ perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates.

4.1.14. The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.

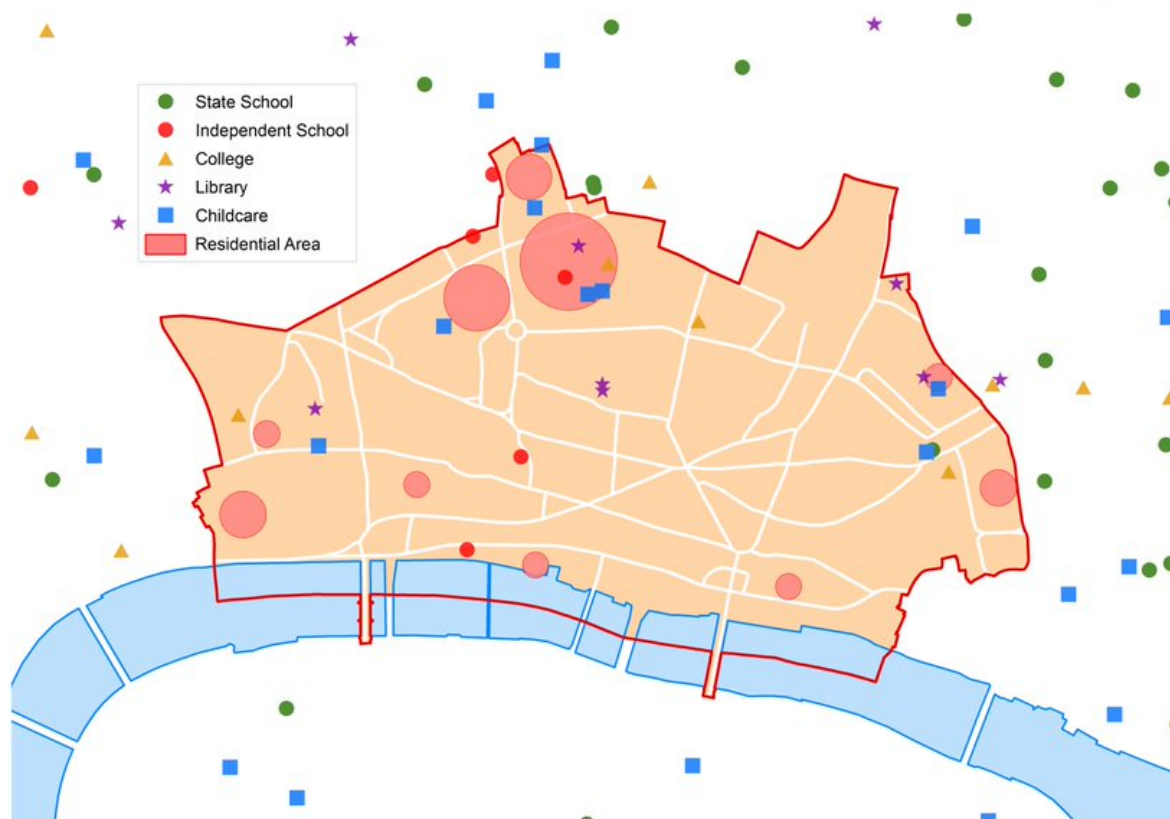


Figure 6: Distribution of skills and education facilities in and adjoining the City

How the policy works

4.1.15. To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and well-being, through

appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling. This could include the provision of land or spaces for food growing, which can help promote a more active lifestyle, improve social cohesion and mental and physical health and well-being.

- 4.1.16. To facilitate the delivery of a healthy city, developers should engage with neighbours before and during construction to ensure impacts on the amenity of neighbours can be minimised.
- 4.1.17. Developers are encouraged to use established methodologies, ~~such as Well Certification under the Well Building Standard~~, to ensure that development contributes towards a healthy city. ~~The Well Building Standard is an~~ There are several accreditation systems ~~that attempts to measure the health and well-being elements of building design, construction and operation and~~ how ~~these building~~ features impact on health and wellbeing. ~~Compliance requirements for the standard fit into seven key areas; air, water, nourishment, light, fitness, comfort and mind. Each category is scored out of 10 and, depending on the total achieved, silver, gold or platinum certification is achieved.~~
- 4.1.18. ~~Health Impact Assessments will be required to support development in the City. For developments of between 10 and 99 dwellings or between 1,000 – 9,999 m2 of commercial floorspace, developers should use the NHS London Healthy Urban Development Unit’s Rapid Health Impact Assessment Tool for preparing their HIA. This allows for a focused investigation of health impacts and should address the most significant impacts and/or those most likely to occur. Full Health Impact Assessments (HIA) should be submitted to support planning applications for over 10,000 sqm GIA for commercial developments or 100 or more residential units. Such assessments consider the impact on people’s health of the development.~~
- 4.1.19. Major commercial developments are encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and well-being of the City’s communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations.
- 4.1.20. Major commercial developments should seek to reach outwards into the community by providing relevant services and facilities which can benefit wider health and contribute to ambitions to reduce single use plastics and other waste, with health impacts such as publicly available drinking water, through the use of public drinking fountains, as well as providing defibrillators and publicly accessible toilets, for example through membership of the Community Toilet Scheme. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.

Policy HIC1: Inclusive buildings and spaces

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

1. inclusive and safe for all, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
2. convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
3. responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Reason for the policy

- 4.1.21. The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users and particularly for disabled and elderly people and those with other mobility difficulties. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit.

How the policy works

- 4.1.22. Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups. **Such engagement should take place at the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm.** Design and Access Statements **must** include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.

Policy HIC2: Air quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment;
2. Development that would result in **deterioration a worsening** of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be refused;
3. All developments **should must** be at least Air Quality Neutral. **Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible.** Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NOx);
4. Developers will be **encouraged expected** to install non-combustion **low and zero carbon** energy technology **where available**;

5. A detailed Air Quality Impact Assessment will be required for combustion based low **and zero** carbon technologies (**e.g. biomass, combined heat and power**), and **any** necessary mitigation must be approved by the City Corporation;
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments;
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest **building in part of** the development to ensure maximum dispersion of pollutants.

Reason for the policy

- 4.1.23. Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. The City, in common with all central London, ~~the whole of the Square Mile~~ has been declared an Air Quality Management Area, due to National health-based objectives for the pollutants nitrogen dioxide (NO₂) and small particles (PM₁₀) are not being met.
- 4.1.24. The City Corporation is working with a wide range of organisations to address this problem and levels of NO₂ are falling, although the health-based limits are still not met everywhere in the Square Mile. The City's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO₂ by the beginning of 2025. Limits set in European Directives for particulate matter (PM₁₀ and PM_{2.5}) are generally met in the City, except adjacent to the busiest roadsides in unfavourable weather conditions. However, the WHO has identified health impacts even at very low concentrations. The City's Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM₁₀ and PM_{2.5} by 2030. The City Corporation has also designated a Low Emission Neighbourhood in the Barbican, Guildhall and Bart's Hospital area of the City with the aim of improving local air quality by reducing the amount of traffic and encouraging and supporting low and zero emission vehicles in the locality.
- 4.1.25. The City's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile, including the introduction of local Zero Emission Zones covering Barbican and Golden Lane and the City Cluster by 2022. An interim two-way Zero Emission Street at Beech Street will

be implemented in 2020. While the main source of pollutants in the City **is currently has historically been** road transport, **but** following implementation of the Mayor's Ultra Low Emission Zone in 2019 it is forecast that a greater share of **remaining** air pollutants will be generated by buildings. It is predicted that by 2020 buildings will account for **almost over** half of NO₂ emissions arising in the City. Tackling poor air quality requires a **broad** range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting **on and around buildings and** within the public realm can help to trap particulate pollution.

How the policy works

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

~~4.1.27. **The Air Quality SPD sets out the circumstances in which an Air Quality Impact Assessment is required and provides guidance on the information required. Such an assessment must be submitted for all major development.**~~

4.1.28. **Developers will be required to manage the impact of their proposals on air quality, which should as a minimum be air quality neutral. Large-scale developments that are subject to Environmental Impact Assessment procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City's air quality. The GLA intends to produce guidance to inform the preparation of statements for developments taking an air quality positive approach.**

Policy HIC3: Noise and light pollution

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

Reason for the policy

- 4.1.29. The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise and light pollution impacts applies to both development that introduces new sources of noise and light pollution ~~or~~ **and** development that is sensitive to noise and light pollution.
- 4.1.30. **Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular problem where large commercial buildings have lights on during the night, which can impact residential amenity.**
- 4.1.31. The main noise **and vibration** sources related to new developments in the City are:
 - Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;

- Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- Leisure facilities and licensed premises, involving noise from people and amplified music; and
- Servicing activities such as deliveries, window cleaning and building maintenance.

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

4.1.33. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making. Policy C4: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.

How the policy works

4.1.34. The City of London Noise Strategy 2016-2026 **identifies sets out** the strategic approach to noise in the City and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise **and vibration** impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.

4.1.35. When bringing forward major development proposals, developers are encouraged to consider whether there may be opportunities to enhance the existing acoustic environment, for instance by incorporating water features that can aid relaxation and help to mask traffic noise. More information about this can be found in the City's Noise Strategy.

4.1.36. For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.

4.1.37. The City Corporation has adopted a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes. **Lighting proposals should take account of impacts on biodiversity and should be designed to ensure an appropriate habitat to improve biodiversity in the City. Particular attention should be paid to the impact of lighting on the City's bat population.**

Policy HIC4: Contaminated land and water quality

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

Reason for the policy

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

How the policy works

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

Policy HIC5: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another **similar social or community** use on the site.
2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:
 - where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - in locations which are convenient to the communities they serve;
 - in or near identified residential areas, providing their amenity is safeguarded; and

- as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Reason for the policy

4.1.40. Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services. As such they make a significant contribution to people's mental, **spiritual** and physical well-being, sense of community, learning and education. Library and educational facilities **for children** and those that support the City's business and cultural roles are particularly important.

How the policy works

4.1.41. Existing social and community facilities will be protected, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to **a similar type of another** social and community use in the first instance. ~~Proposals for the redevelopment or change of use of social and community facilities to an alternative use must be accompanied by evidence of a lack of need for the existing facilities and a greater need for the proposed new facilities.~~

4.1.42. Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources. **For example, the Artizan Street Library hosts community meeting rooms, play groups and exercise classes as well as traditional library facilities. Places of worship have the potential to accommodate a range of activities on their premises which can help improve community cohesion.** Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.

4.1.43. Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable **size** or **provide a better quality of service standard to target communities.**

Policy HIC6: Public conveniences toilets

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

- requiring the provision of a range of directly accessible public toilet facilities in major retail, ~~and~~ leisure **and transport** developments, particularly near visitor attractions, public open spaces and **existing** major transport interchanges. Provision should be made for disabled people and their carers (changing places toilets). Publicly **accessible** toilets should be available during normal opening hours, or 24 hours a day in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing **public publicly accessible** toilets **as a result of redevelopment**, and requiring the provision of replacement facilities, unless adequate provision is available nearby; and
- ~~taking the opportunity to renew~~ **requiring the renewal of** existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Reason for the policy

4.1.44. Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly **accessible conveniences toilets** are a particularly important facility for a number of groups, such as the elderly, disabled ~~and parents~~ **people with babies and** young children, **pregnant women and others with chronic illnesses**. **They are also important to meet the needs of tourists and visitors to the City and are a necessity in areas where people spend considerable time such as tourist areas. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.**

4.1.45. Areas of the City with concentrations of night-time entertainment require adequate **publicly accessible** toilet provision to prevent fouling of the streets.

How the policy works

4.1.46. The City Corporation ~~provides public toilets and aims to provide a distribution which effectively meets public demand, but this needs to be supplemented by~~ **will encourage the** provision **of publicly accessible toilets** in major retail, ~~and~~ leisure, **transport and commercial** developments, **secured through legal agreements** and through encouraging membership of the Community Toilet Scheme. ~~The City Corporation provides attended toilets equipped with baby changing units and facilities for disabled people, while automatic toilets provide a 24-hour service.~~ The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

- 4.1.47. Publicly **accessible** toilets should be clearly signposted to ensure they are easily found. The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.
- 4.1.48. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, rather than as a replacement. **Where publicly accessible toilets are provided**, consideration should be given to the provision of self-contained gender-neutral toilets.

Policy HIC7: Sport and recreation

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

Reason for the policy

- 4.1.49. There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities within office developments and some hotels. The rapid growth in the working population, as well as the increasing recognition of the importance of healthy lifestyles, means there is a continued demand for these facilities.

How the policy works

4.1.50. **The City Corporation will protect existing public sports and recreation facilities, where there is a need, and encourage the provision of new public and private facilities. While such facilities are important in meeting sport and recreational needs, it will not always be necessary to prevent their change of use, due to the fluid nature of the private market.** However, any proposals involving the loss of **public** sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current **public** facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. **The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan.**

4.1.51. Open spaces and publicly accessible rooftops can provide valuable **formal or informal** sports and recreational facilities in the densely built City environment. **An imaginative approach to multi-purpose structures in outdoor spaces can allow seating and other street furniture to be designed to also facilitate physical activities that promote health and fitness, such as stretching, sit ups and markers for walking and running distances.**

Policy HIC8: Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas where a need has been identified, by:
 - protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
 - requiring external play space and facilities as part of major new residential developments;
 - where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or **provide** financial contributions to enable the provision of facilities elsewhere; and
 - promoting opportunities for informal play **and play** within open spaces where it is not possible to secure formal play areas.
2. Play areas and facilities must be inclusive and not be located in areas of poor air quality due to the negative health impacts on young children.

Reason for the policy

4.1.52. Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play.

How the policy works

4.1.53. Due to the ~~City's large working population~~ **significant development of sites and creation of public realm** there are opportunities to create informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

4.1.54. Public realm ~~spaces~~ **improvements and the creation of new open spaces** should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. **Where the opportunity arises, the** The City Corporation ~~plans to provide~~ **will enable** appropriate sensory play areas in the City for children, ~~and~~ young people **and adults** with special educational needs **and disabilities**.

Policy HIC9: Health Impact Assessment (HIA)

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

1. requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning checklist;

2. requiring a Rapid or Full HIA to be submitted for larger-scale development proposals.

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

Reason for the policy

4.1.55. **The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of daily visitors can impact on people's physical and mental health.**

4.1.56. **Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking,**

cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.

4.1.57. HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and well-being of the population and highlight any health inequalities that may arise.

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

How the policy works:

4.1.59. Developers will be expected to identify potential impacts on health resulting from all major developments in the City. To assist this process, the City Corporation will publish guidance based on the NHS London Healthy Urban Development Unit's (HUDUs) HIA methodology but adapted to address City specific issues.

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

Desktop assessment

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

4.1.62. The Healthy City Planning checklist should be submitted with planning applications for developments of between 10 and 99 dwellings or between 1,000m² – 9,999m² of commercial floorspace. It will also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and areas where air pollution and noise issues are particularly prevalent.

Rapid HIA

4.1.63. This would require a more focused investigation of health impacts which would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London HUDU Rapid HIA Tool to reflect the City's circumstances and will expect this to be used for developments of 10,000m² or greater commercial floorspace or 100 or more residential units.

Full HIA

- 4.1.64. **This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.**
- 4.1.65. **HIAs must look at the issue of health comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.**

4.2. Safe and Secure City – THIS SECTION TO BE UPDATED FOLLOWING DISCUSSIONS WITH IAN HUGHES AND SECURITY BOARD

Context

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

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

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

4.2.3. The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership's vision is for the City of London to be a safe place to live, work, visit, study and socialise. The Partnership meets regularly and publishes an annual strategy document, which identifies key priorities. These currently comprise:

- Supporting the Counter Terrorism Strategy through delivery of the Prevent Strategy;
- Violence against the person;
- Acquisitive crime;
- Night time economy crime and nuisance;
- Anti-social behaviour.

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

Strategic Policy S2: Safe and Secure City

The City Corporation will work with the City of London Police to ensure that the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently by:

1. Minimising the potential for crime and anti-social behaviour by encouraging a mix of uses and natural surveillance of streets and spaces;
2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
4. Taking account of the need for resilience in developments so that residential and business communities are better prepared for, and better able to recover from, emergencies (including the promotion of business continuity measures).

Reason for the policy

4.2.5. Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation not only between the City Corporation and the City of London Police, but also between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London. Close working with developers and occupiers is also essential.

How the policy works

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

4.2.7. The design of a scheme should create safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience.

Policy SSC1: Crowded Places

All major developments are required to **satisfy the principles and standards that** address the issue of crowded places and counter-terrorism by:

- Conducting a full risk assessment;
- Undertaking early consultation with the City of London Police on risk mitigation measures;
- Restricting or rationalising motor vehicle access where required; and
- Ensuring that public realm and pedestrian permeability is not adversely impacted, and that the design of the development considers the application of Hostile Vehicle Mitigation measures at an early stage.

Reason for the policy

4.2.8. Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.

4.2.9. Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development, the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism.

4.2.10. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach. Other measures that have been taken in the City include the City of London Traffic and Environmental Zone, which is the security and surveillance cordon that surrounds the Square Mile. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City. In 2016, the City Corporation also approved an Anti-Terrorism Traffic Regulation Order (ATTRO), a counter-terrorism measure that allows the City of London Police to close routes at certain times, specified in the order, and divert vehicles away from the area to deal with identified threats. Its purpose is to avoid or reduce the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism.

How the policy works

4.2.11. A risk assessment should be submitted for approval by the City Corporation as part of a planning application **for major development** or transport proposals. **The risk assessment should be proportionate to the nature of the risk identified through consultation with the City of London Police and will typically which** includes:

- Assessment of the risk of structural damage from an attack;
- Identification of measures to minimise any risk;
- Detail on how the perimeter is treated, including glazing;

- Consideration of adjacent land-uses and commuter routes.

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

Policy SSC2: Dispersal Routes

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

Reason for the policy

4.2.13. The City increasingly operates on a **24-hour**, 7 day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents **and occupiers** and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

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

4.2.15. **The planning and design of dispersal routes should take into account the needs of people with physical or mental disabilities and people with restricted mobility.**

How the policy works

4.2.16. The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy C4: Evening and Night-time Economy.

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

4.2.18. A Management Statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. **Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help ensure that the measures contained in the Management Statement are appropriate to local circumstances.** Assessment of the Management Statement will have regard to the City of London Noise Strategy, the

provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

Policy SSC3: Designing in Security

1. Security measures must be incorporated into the design of development at an early stage avoiding the need to retro-fit measures that adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. All development should be designed to minimise the need for Hostile Vehicle Mitigation on the public highway. Developers will be expected to contribute towards the cost of **necessary** on-street mitigation of the risk of vehicle attacks in the vicinity of their developments.
4. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
5. All security measures which are expected to be more than very short-term should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design.
6. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.

Reason for the policy

- 4.2.19. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage.

How the policy works

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

City Cluster. **The City Corporation will use s106 planning obligations requiring developers to contribute to** measures to enhance collective security, **where appropriate measures when designing major developments will be welcomed.**

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

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

4.2.24. Early engagement with the City of London Police and the City Corporation is essential **to ensure that security measures are appropriate to evolving threats.** Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.

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

4.3. Housing

Context

- 4.3.1. The permanent residential population of the City, estimated to be around **7,400 8,000**, is small in comparison to the daily working population in excess of **480,000 520,000**. The GLA's 2016-**based** projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 10,000 by 2036. **When As** the City's housing stock increases the resident population does not increase in proportion as many residential units are used as second homes or for short term letting. The 2011 Census indicated that there were 1,400 second homes in the City of London.
- 4.3.2. The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential **clusters areas** are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units **developed** in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2016. There have also been a number of developments providing shorter term accommodation (short lets or serviced apartments).
- 4.3.3. Most new residential development has been located in or near existing residential areas in accordance with Local Plan policy. This allows greater opportunity to protect residential amenity and deliver a high-quality residential environment. Residential clustering reduces potential conflict with commercial and office uses, **and the areas are more easily serviced with facilities required by residents.**
- 4.3.4. References to housing in this Plan include market, intermediate and affordable housing, hostels, sheltered and **extra care special needs** housing. Student housing **is addressed separately will contribute towards meeting general housing need at the national ratio of 2.5 student rooms to 1 residential unit.**

Housing requirement

- 4.3.5. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is, **however**, required to be in **general** conformity with the London Plan, which sets an annual housing target for the City and the London boroughs. The draft London Plan 2017, **Policy SD5 indicates that residential development is inappropriate in the commercial core of the City of London and within this context** requires the City of London to deliver **146 1,460** new homes **each year** during the period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. The draft London Plan **2017** also **included includes** a target that **an annual average of 74 740** units should be provided on small sites of less than 0.25 hectares in size **over the 2019/20 – 2028/29 period.**

- 4.3.6. The City's 2016 SHMA assessed the level of housing need, **including the needs of those requiring supported and specialised accommodation in the City,** over the period 2014-36, using the latest population and household projections. **The SHMA, and** identified an objectively assessed need for an annual average of 126 dwellings per year. **Using the national standard method for assessing local housing need, the City's minimum annual local housing need figure over the ten-year period from 2020 to 2030 would be 112.**
- 4.3.7. The City Corporation's **Housing Strategy 2019-23** aims to deliver **around 900 at least 700** new homes on City-owned land and housing estates by 2025, ~~with potential for up to and a further~~ 3,000 ~~further new mixed tenure~~ homes on other sites delivered in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs. The City Corporation considers that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the City's SHMA. This draft Local Plan therefore seeks to meet the draft London Plan housing target of 1460 dwellings ~~per year~~.
- 4.3.8. The City Corporation's Housing Trajectory shows that the supply of small windfall sites, together with large sites in the development pipeline, will provide sufficient capacity to meet the London Plan annual average monitoring target of 146 additional homes per year (see Figure 7: City of London Housing Trajectory 2018 below). It is anticipated that there will be a sufficient supply of housing to achieve London Plan targets up to at least 2026 on the basis of sites in the development pipeline and past trends.

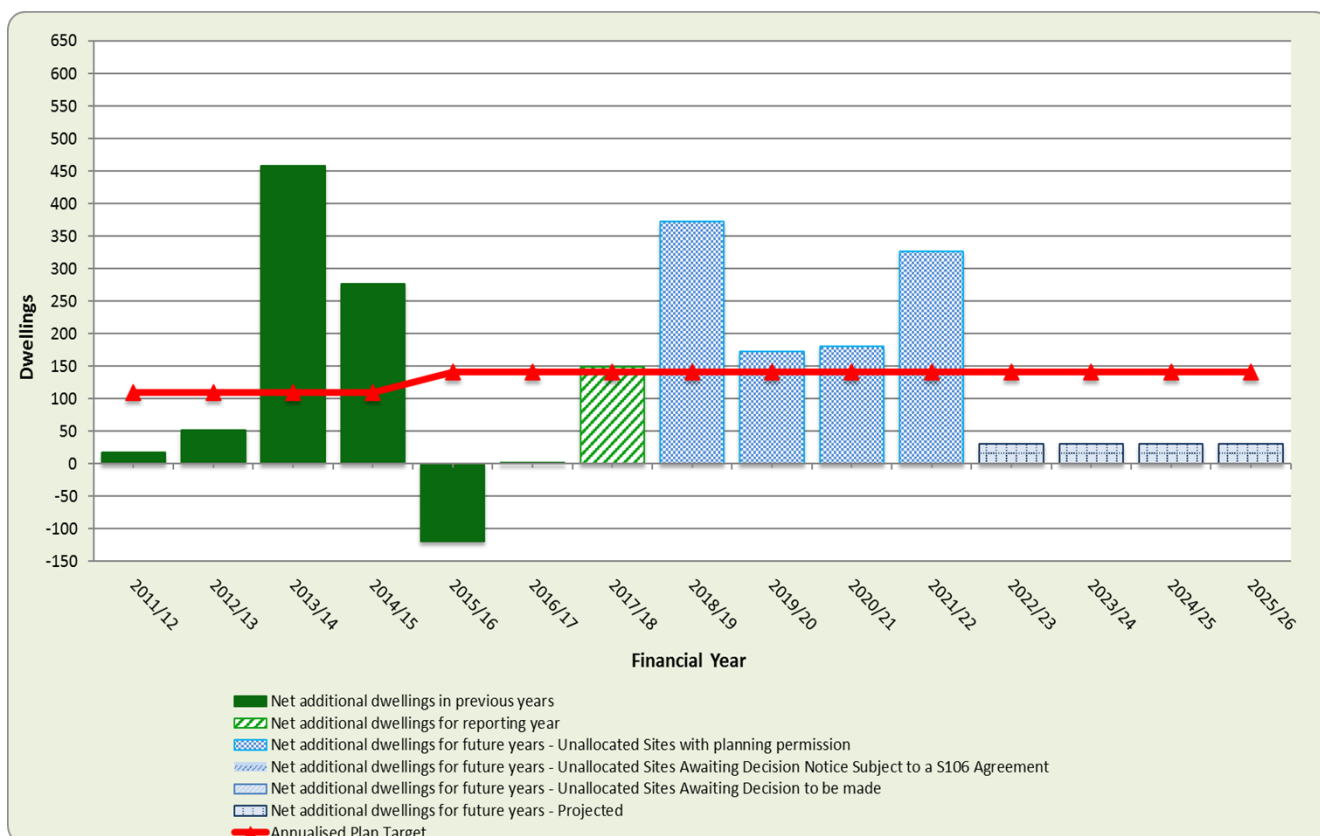


Figure 7: City of London Housing Trajectory **2018 TO BE UPDATED TO SHOW PERIOD TO 2036**

4.3.9. **The City Corporation's Article 4 Direction which removes permitted development rights for the change of use of offices to residential**, the size and commercial character of the City **and the priority given to commercial development through London Plan Policy SD5**, mean that new housing development has been delivered through 'windfall' development rather than through the allocation of sites. **City Corporation monitoring shows that in the period 2011/12 to 2021/22, completions and permissions on windfall sites will have delivered an annual average of 198 dwellings per year. Past evidence demonstrates that the reliance on windfalls has delivered a steady stream of new housing, meeting and exceeding target requirements.** It is anticipated that windfalls will continue to deliver the majority of housing. The City Corporation has **also** published a brownfield land register on its website, identifying land that is suitable for residential development in accordance with government requirements.

4.3.10. The Mayor of London prepares a Strategic Housing Land Availability Assessment (SHLAA) for London, providing guidance on the amount of land potentially available in the City for residential development. **The 2017 SHLAA prepared to inform the draft London Plan 2017 identifies a potential supply of large housing sites in the City in the period 2019-2029 of 527 dwellings and an annual average of 74 dwellings on sites under 0.25 hectares, based on past trends. This provision would be sufficient to meet London Plan housing targets up to 2029. Beyond 2029 and up to the end of the Local Plan period, it is expected that further windfalls will come forward to ensure that the City of London can meet its housing requirements for the longer term. In the event**

that monitoring demonstrates that insufficient housing land is coming forward, the City Corporation will review this Plan or bring forward a partial review relating to housing land supply.

4.3.11. The City Corporation will continue to support the delivery of new market and affordable housing on its own housing estates and other appropriate land holdings outside the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London's wider housing needs.

Affordable Housing

4.3.12. The City of London is an expensive area to live in. **The SHMA ONS data shows that the affordability ratio of lower quartile house prices to lower quartile residential earnings in 2013-2016 was 13.44-17.51, above the London average of 13.32 and the England average of 6.91, the seventh highest in London and significantly above the national average of 6.45, or the inner London average of 10.00. The City of London SHMA shows that R**rental prices in the City were also significantly above the London-wide average or the average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests a need for an additional 69 affordable dwellings per year to meet affordable housing needs.

Gypsy and traveller accommodation

4.3.13. The ~~draft~~ London Plan indicates that, in the absence of an up to date local gypsy and traveller needs assessment, **boroughs should use the need figure set out in Table 4.4 of the London Plan. This table indicates needs should be assessed using the mid-point figure of need in the GLA's 2017 Gypsy and Traveller Accommodation Topic Paper. This indicated** that there is no need for specific gypsy and traveller accommodation in the City of London. ~~This assessment is consistent with earlier assessments undertaken by the Mayor.~~ **The City Corporation will work with the Mayor and London Boroughs in the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment.**

Strategic Policy S3: Housing

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

1. Making provision for an annual requirement of 146 additional residential units in the City up to 2036:
 - guiding new housing development to sites in or near identified residential areas;
 - protecting existing housing where it is of a suitable quality and in a suitable location;

- exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and
 - refusing new housing outside the residential areas which would prejudice the primary business function of the City or be contrary to Policy O2.
2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by ~~requiring residential developments with the potential for more than 10 units to:~~
- ensuring the delivery of a minimum of 50% affordable housing on public sector land; and
 - requiring residential developments with the potential for more than 10 units to provide a minimum of 35% affordable housing on-site. Exceptionally, 60% of affordable housing may be provided off-site, or equivalent cash-in lieu, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and
 - ~~provide~~ providing a mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.
3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
4. Ensuring that other land uses within identified residential areas are compatible with residential amenity;
5. Requiring 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 90% of new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Reason for the policy

- 4.3.14. London has a severe housing shortage caused by a growing population and an inadequate supply of housing units. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still ensuring that the City remains predominantly a commercial office centre of national importance. New models of providing housing to meet people's changing housing needs will be encouraged where appropriate.
- 4.3.15. New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Housing Suitably located housing in the City

can address local housing need and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.

4.3.16. The London Plan includes a detailed policy which supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting and is typically owned by institutional investors and will be supported where it meets the detailed requirements in the London Plan.

4.3.17. **Many households in London already require accessible or adapted housing to lead dignified and independent lives. More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving to alternative accommodation.**

How the policy works

4.3.18. **To ensure that permissions for new housing are built out in a timely fashion, developers should provide information on the expected completion date for new residential development. The City Corporation will keep this under review and expect developers to liaise with the Corporation where it becomes apparent that anticipated completion dates cannot be achieved.**

4.3.19. There is a presumption in national policy and the London Plan that new affordable housing **associated with development** should be provided on site. The City Corporation will expect developers to deliver affordable housing **on in** new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable.

4.3.20. Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace. The City Corporation therefore works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. However, the presumption in this Plan is that affordable housing should be provided on site.

4.3.21. The City Corporation requires commercial development to make a financial contribution towards affordable housing delivery instead of delivering mixed use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.

4.3.22. The draft London Plan and the Mayor's adopted Affordable Housing and Viability Supplementary Planning Guidance set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m². **The Mayor has adopted a threshold**

approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, **or 50% on public sector land,** are not required to submit viability information. **Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses.**

- 4.3.23. In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. **On public sector owned land, the higher 50% target set out in the London Plan will be applied.** In exceptional cases where off-site provision or cash in lieu contributions is considered to be acceptable in principle, 60% affordable housing will be sought to avoid creating a financial benefit to the applicant relative to on-site provision. Further guidance on affordable housing requirements, including the level of cash-in lieu or off-site contributions required are set out in the City Corporation's Planning Obligations SPD. This SPD will be kept under review and ~~periodic adjustments made to amended as~~ required ~~levels of to ensure~~ financial contributions ~~in light of evidence of changes in~~ **are in line with** the cost of delivering affordable housing.
- 4.3.24. Developments which propose lower levels of affordable housing will need to be supported by robust viability assessments. These assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will ~~also~~ commission an independent review of submitted assessments, with the cost ~~of this review~~ being met by the applicant. Consideration of viability and overall levels of affordable housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.
- 4.3.25. The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. ~~If a developer overpays~~ **Overpaying** for a site, ~~this~~ will not be regarded as an appropriate justification for failing to meet the affordable housing target.
- 4.3.26. Where a viability assessment demonstrates that the Plan's affordable housing targets cannot be met, the City Corporation will ~~normally~~ require an upwards only review mechanism to be included within any s106 planning obligation to ensure that any increases in scheme value or reduction in cost are appropriately reflected in increased affordable housing contributions. The detailed wording and timing of these review mechanisms will be determined on a case by case basis, having regard to ~~the~~ **the** City Corporation's Supplementary Planning **Guidance Document** and **Supplementary Planning** Guidance prepared by the Mayor in support of the London Plan.
- 4.3.27. Various types of affordable housing ~~products~~ are included within the national definition of affordable housing. The draft London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough

based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City **and London Plan requirements**. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix **for proposed schemes**.

- 4.3.28. The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible.

Policy H1: Location of New Housing

1. New housing will be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential, commercial and other uses will be permitted.
2. New housing must not:
 - prejudice the primary business function of the City, or result in the loss of viable office accommodation, contrary to Policy O2;
 - inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
 - result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.
3. Where existing residential estates are being redeveloped, the existing affordable housing on-site must be re-provided with at least the equivalent floorspace and tenure of affordable housing. Affordable housing which is re-provided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.

Reason for the policy

- 4.3.29. The City is a busy and sometimes noisy place, with a high density of development and business activity **24 hours a day at all times during the day and evening**, 7 days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because **they it** could have an adverse impact on the City's primary business role **and its ability to operate 24/7** and would be likely to have poor residential amenity. The draft London Plan indicates that residential development is inappropriate in **defined identified** parts of the City to ensure that the current and future potential to assemble **sites** and deliver office development is not compromised by residential development. Elsewhere in the City, offices and other strategic functions of the

Central Activities Zone should be given greater weight **in planning terms** than residential development, except in wholly residential streets or predominantly residential neighbourhoods.

4.3.30. The City's policy approach is therefore to locate new housing within or near the existing residential areas shown in Figure 8, where reasonable residential amenity consistent with a central London location can be achieved. This approach helps to minimise disturbance to residents within the clusters, while reducing potential conflict with the development and operation of commercial uses.

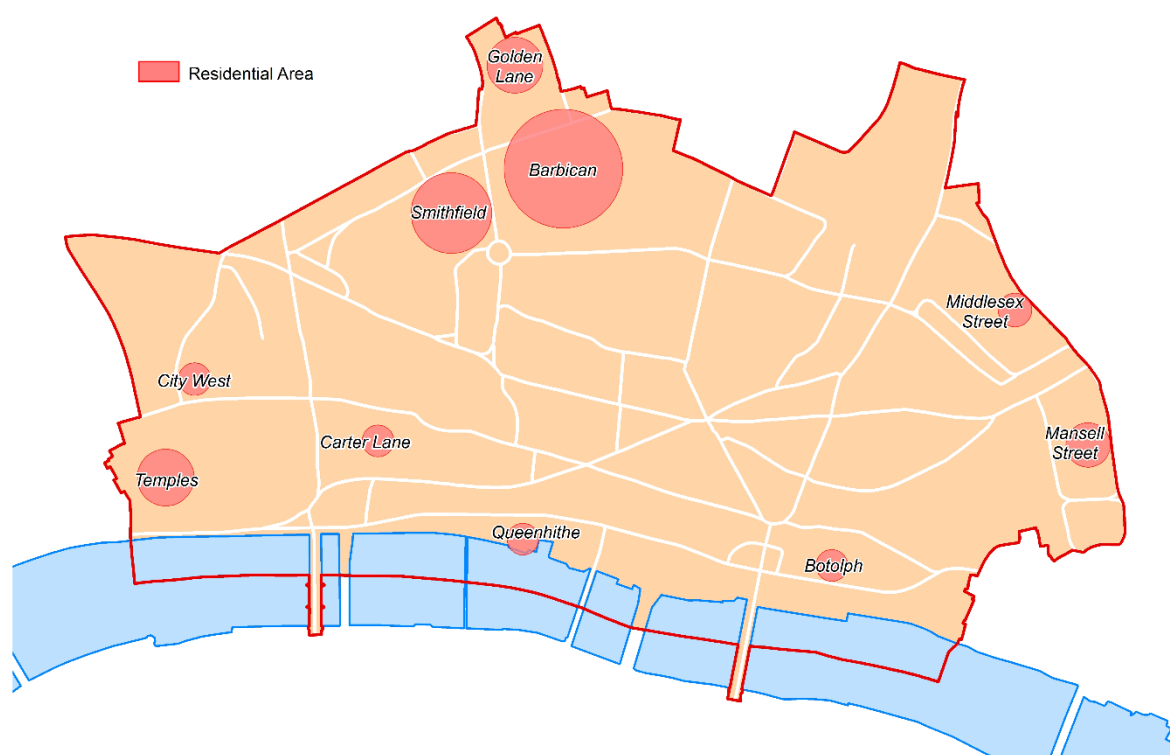


Figure 8: Residential Areas

4.3.31. Due to the size and unique character of the City, all new housing has come forward on 'windfall' brownfield sites through the redevelopment or conversion of existing buildings as opportunities arise. There has been no need to allocate sites in the Local Plan to meet housing targets and this pattern of housing delivery is projected to continue throughout the life of this new Plan.

How the policy works

4.3.32. To accord with policy O2, applicants proposing the redevelopment or change of use of existing office accommodation must provide robust evidence to demonstrate that the site is not suitable and viable for office use and the proposal will not prejudice the primary business function of the City. Within or near the residential areas, if the City Corporation is satisfied that the loss of an office site is justified by the evidence provided, then redevelopment to provide residential use may be appropriate. Further details are set out in the Office Use SPD.

- 4.3.33. Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted which demonstrates how the development will mitigate the impact of noise and pollution.
- 4.3.34. Regeneration of housing estates will often involve the redevelopment of existing homes. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. This will help protect established local communities.

Policy H2: Loss of housing

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

- they provide poor amenity to residents which cannot be improved; or
- they do not have a separate entrance; or
- ~~large scale office development would be prejudiced by the retention of isolated residential units; or~~
- exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

Reason for the policy

- 4.3.35. The net loss of existing housing will be resisted because of the limited opportunities to replace ~~that housing stock it~~ in the City. This policy will be applied to proposals for the amalgamation of adjoining residential units unless the existing accommodation is of such poor quality that it cannot provide a reasonable standard of amenity, or the proposed unit would meet a clearly identified need for larger family accommodation. Exceptionally the net loss of existing housing may be acceptable, particularly outside residential areas where the development of offices will have a significant beneficial impact for the City. Isolated residential units outside identified residential areas can suffer poor amenity ~~and can be adversely affected by the operation of the business City. Housing units outside identified residential areas are more likely to suffer, such as~~ noise nuisance and other disturbance due to non-residential uses in close proximity, including clubs and pubs and can be adversely affected by the operation of the business City.

Policy H3: Residential environment

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

1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity.

2. All development proposals should be designed to **avoid minimise** overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
3. All **new** residential development proposals must **accord with the 'Agent of Change' principle**, demonstrating how potential adverse noise impacts on and between dwellings will be mitigated by **housing** layout, design and materials, **in accordance with the 'Agent of Change' principle**. This principle is **also** applicable when new housing proposals might otherwise constrain existing uses.
4. The cumulative impact of **planning applications for** individual developments on the amenity of existing residents will be considered.

Reason for the policy

4.3.36. The City is predominately a centre of business, with activity taking place **24 hours a day at all times during the day and evenings**, 7 days a week. This sometimes results in noise and disturbance to residents from new commercial development and commercial activities nearby. While the City Corporation will endeavour to minimise noise and other disturbance to residents it is inevitable that living in such a densely built-up area will result in some disturbance from a variety of sources, **particularly outside the identified residential areas**.

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

How the policy works

4.3.38. The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts **of development** on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas. Policy C4 addresses evening and night-time economy uses, **while Policy HIC3 seeks to minimise noise and light pollution**.

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

Policy H4: Housing quality standards

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

- meets London Plan housing space standards;

- meets standards for Secured by Design or similar certification; and
- maximises opportunities for providing open and leisure space for residents.

Reason for the policy

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

How the policy works

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

4.3.42. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy D8. **There should be no distinction between amenity spaces and play areas for private and affordable housing residents. Proposals which seek to restrict access to such areas by affordable housing tenants will be refused.** Daylight and sunlight to dwellings is addressed in the Design section of the Plan.

Policy H5: Short term residential letting

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

Reason for the policy

4.3.43. **The City of London is primarily a commercial office centre. There is a small stock of permanent residential properties and this stock needs to be maintained to ensure that the City can continue to meet its assessed housing need. Loss of residential accommodation to short-term letting would reduce the overall stock of permanent housing and the City's ability to meet its housing need. At the same time, there is a demand for residential accommodation that can be let on a short-term basis to provide for the needs**

of the City's business community, particularly for visiting workers. Such short-term accommodation is normally provided on a commercial basis and should be considered separately from the loss of permanent residential accommodation.

How the policy works

- 4.3.44. Under the Deregulation Act 2015, short term **residential** letting for less than 90 days in a calendar year of domestic premises liable for council tax does not require planning permission. Letting for periods of more than 90 days in a calendar year would require permission.
- 4.3.45. Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and adversely impacting on the amenity of existing residents.
- 4.3.46. Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy H1.
- 4.3.47. **The provision of short term lets** for commercial purposes can help to meet the accommodation needs of business visitors and may be suitable within identified residential areas. Such **residential** letting can have significant impacts on the amenity of neighbours by reason of noise, disturbance, and occasionally anti-social behaviour. ~~For this reason, w~~Where such accommodation is proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.
- 4.3.48. The requirement for the provision of affordable housing in Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

Policy H6: Student housing and hostels

1. Proposals for new student accommodation and hostels **should support the City of London's primary business function and** will ~~be refused~~ **only be permitted** where they **do not** ~~would~~:
- prejudice the primary business function of the City, or result in the loss of **suitably located and viable** office ~~buildings or sites~~ **floorspace**, contrary to Policy O2;
 - **result in an excessive concentration of student housing and/or hostels;**
 - have an adverse impact on the residential amenity of the area; and
 - involve the loss of permanent residential accommodation.

2. Proposals for Purpose-Built Student Accommodation (PBSA) ~~must~~ should be supported by identified further or higher educational institutions operating in the City of London or the Central Activities Zone ~~and must provide accommodation for their own students.~~
3. 35% of student housing on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
4. The loss of existing student housing and hostels to other suitable uses which are in accordance with ~~other~~ Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is evidence that student accommodation is impacting on residential or business amenity.

Reason for the policy

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

How the policy works

- 4.3.50. New Purpose-Built Student Accommodation (PBSA) ~~will only be permitted when should be~~ supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the Central Activities Zone, through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation. A Section 106 agreement will be required which limits occupation to students studying at the stated further or higher education institution, in or near the City.
- 4.3.51. The Housing Delivery Test establishes a national ratio that every 2.5 ~~Every three~~ student bedrooms in PBSA ~~that are~~ completed ~~equate to~~ meeting the same housing need as one conventional housing unit and contribute to meeting the City's housing target at the this ratio. ~~of three bedrooms being counted as a single home.~~
- 4.3.52. National space and accessibility standards do not apply to student accommodation but other Plan policies require inclusive and high quality design, which will assist in ensuring the needs of students with disabilities are accommodated.

Policy H7: The Temples

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

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

Reason for the policy

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

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

How the policy works

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

Policy H8: Older persons housing

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

- supporting development that meets the specific needs of older people;
- supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
- **ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and**
- resisting development that involves the net loss of housing for older people.

Reason for the policy

4.3.56. The City of London has an ageing resident population profile, in line with national demographic trends. **Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist**

housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for 67 **specialist** older person units over the life of the Plan, and the London Plan has an indicative figure of 10 units per year.

How the policy works

4.3.57. The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet **identified** needs **identified in the City of London SHMA. Specialist older persons housing should deliver affordable housing in line with Policy S3. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. This issue is addressed in Policy VT3.**

Policy H9: Self and custom housebuilding

The City Corporation will encourage **developers to consider** the **potential for provision of** self and custom build units within **large** residential schemes.

Reason for the policy

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

How the policy works

4.3.59. There are no large areas of unused land in the City of London that would provide an opportunity to create serviced building plots. Furthermore, self-build and custom-build are likely to involve low density development, which would conflict with policies in the Plan which seek to maximise housing supply. Given these constraints, the City Corporation considers that the best prospect for bringing forward suitable land will be in conjunction with large housing developments where units can be built to shell and core and individually fitted out.

5. Support a Thriving Economy

5.1. Offices

Context

- 5.1.1. The City is London's historic business core and today represents the largest concentration of office-based employment in the capital. It forms a world leading international financial and professional services centre, renowned for its financial, insurance and legal sectors which are the main office occupiers. However, the City is **evolving, with is seeing** a rapid increase in serviced offices and co-working providers, which offer more flexible workspace options and attract a more diverse range of occupiers including technology, creative enterprise and media companies.
- 5.1.2. The whole of the City forms the business cluster and is suitable for **further** commercial development. There are, however, residential clusters within the City where a mixture of residential and commercial uses will be permitted (see Policy S3).
- 5.1.3. The City **was home to accommodated 17,980 23,580** businesses and **483,000 522,000** workers in **2016 2018** and employment is projected to continue to grow over the long term. Over 98% of all the City businesses are Small and Medium Enterprises (SMEs) with fewer than 250 employees; 80% have fewer than 10 employees.
- 5.1.4. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The agglomeration, or clustering, of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business.
- 5.1.5. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects that **employment in the** City of London **employment** will grow by 116,000 from 2016 to 2036, of which approximately 103,000 **employees** are estimated to be office based. London's rapidly growing population will **also** create the demand for more employment and for the space required to accommodate it.
- 5.1.6. The United Kingdom's exit from the European Union will have short and long-term effects on economic and employment growth depending on the detailed arrangements to be agreed. Whatever those arrangements London's strong underlying strengths mean that it is necessary to plan for continued growth to ensure that the City remains a global financial and **business professional services** centre.

Strategic Policy S4: Offices

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

1. Increasing the City's office floorspace stock by a minimum of 2,000,000m² net during the period 2016 to 2036, ~~to meet the long-term economic needs of the City and accommodate projected employment growth~~, phased as follows:
 - 2016 – 2021 750,000m²
 - 2021 – 2026 750,000m²
 - 2026 – 2031 250,000m²
 - 2031 - 2036 250,000m²
2. Ensuring that new floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs ~~for a variety of workspace types suitable for~~ of SMEs, start-up companies and those requiring move-on accommodation.
3. Where appropriate, ~~Ee~~ncouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City.
4. Protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City.

Reason for the policy

- 5.1.7. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 2,000,000m² is derived from the estimated growth in office employment between 2016 and 2036 and represents a 23% increase in floorspace. Details of the floorspace calculation are set out in the City Corporation's Office Floorspace Target Evidence Document.
- 5.1.8. In 2016, 25% of take-up of office floorspace in the City of London was from "Media and Tech" firms, compared to 28% from "Financial" companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. This broader range of occupiers is creating requirements for a broader range of office types. In 2018 there were approximately 41,000 persons in the City employed in Creative Industries.
- 5.1.9. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the

City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.

5.1.10. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City, but developers are encouraged to consider a range of leasing structures, including below market rents, where appropriate. The City Corporation is working closely with neighbouring boroughs to ensure that affordable workspace and move-on accommodation needs can be accommodated, in particular providing signposting and assistance to businesses in finding suitable office accommodation.

How the policy works

5.1.11. Policy S4 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.

5.1.12. The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the Policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first 2 phasing periods. It is expected that 75% of the floorspace target will be achieved by 2026, with the remaining 25% in the latter phases.

5.1.13. The City Corporation has made an Article 4 Direction ~~will come into force on 31 May 2019. This Direction~~ removing permitted development rights for the change of use of offices (B1a) to dwelling houses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan. ~~and with the national exemption from permitted development rights, which has operated in the City of London since May 2013 and been extended to 30 May 2019.~~

Policy O1: Office Development

1. Office development should:

- ~~B~~be of an outstanding design and an exemplar of sustainability; and
- ~~B~~be designed for future flexibility ~~to allow for sub-division and amalgamation of floorplates~~ to future proof the City's office stock; and

- provide office floorspace suitable for a range of occupiers; and
- **where appropriate**, provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.

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

Reason for the policy

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

5.1.15. Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City's economy include retail, leisure, education and health facilities **and cultural uses**. A mix of commercial land uses, in particular at ground floor and basement levels, **can** creates active frontages enhancing an area's vitality and providing important complementary services. ~~particularly to the City's working community~~.

How the policy works

5.1.16. Proposals for new office development should demonstrate design quality and flexibility to accommodate a range of businesses. Particular encouragement will be given to floorspace which meets the needs of small businesses, start-ups and incubator space. Office development should include a suitable mix of complementary commercial or other uses appropriate to the site and location and contribute to the creation of active frontages at street level.

Policy O2: Protection of Existing Office Floorspace

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

- there is no demand in the office market, supported by marketing evidence covering a period of no less than ~~18~~ **12** months; **and**
- refurbishment or re-provision of office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; **and or**
- ~~a mixed-use commercial redevelopment providing a reduced amount of better quality office space has been considered and its viability~~

evaluated. the loss of office floorspace is limited to ground or below ground levels and proposed new uses would be complementary to continued office use on upper floors.

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

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

Reason for the policy

5.1.17. The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the **increase in demand for projected increase in employment and** office floorspace, it is important to maintain existing office stock whilst accommodating future demand through the provision of flexible floorspace which is suitable for a range of occupiers.

5.1.18. The protection of existing offices is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. Proposals involving the loss of office accommodation will need to be supported by robust evidence of **need marketing** and viability to ensure that viable offices can be retained to meet future office need.

5.1.19. Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy D1 and the need to find suitable and sustainable uses for historic buildings. Historic buildings can provide affordable office stock though they have specific constraints and opportunities which may affect **the viability of** refurbishment **scheme viability.**

How the policy works

5.1.20. To support proposals for the loss of existing office floorspace, applications must demonstrate that there is no demand for refurbished or new offices, or an office-led mixed-use development. Where a proposal results in a reduced amount of office floorspace, account will be taken of the type and size of office floorspace provided and **if whether** there is a specific need for office floorspace of that size and type in the City.

5.1.21. The change of use of office floorspace at ground and lower ground levels can improve the vibrancy of an area by introducing more active frontages **and delivering more permeable buildings and spaces** and will be supported where it does not prejudice the use of the building or site for office purposes. The loss of office floorspace on the upper levels of buildings **would require is of particular**

~~concern and~~ robust evidence ~~will be required~~ to demonstrate why ~~such spaces cannot be used for continued~~ office use is not possible.

5.1.22. ~~Where A proposal for~~ the loss of office floorspace ~~is proposed, this~~ should be accompanied by robust evidence of marketing of the building or site for continued office use over a period of at least **48 12** months. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site. ~~Information should be provided which details the number of viewings/interested parties, and comments regarding the suitability of the site/building.~~ Proposals must ~~also be supported by~~ provide evidence that the continued office use of the site would be unviable in the longer term.

5.1.23. Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances **and should include the following:** ~~As part of a viability assessment, the following information should be included:~~

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

5.1.24. Where evidence demonstrates that continued office use is unviable, alternative uses will be considered in line with the policies in the Local Plan. **Further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD.** ~~Demonstration that office use is not viable will not, on its own, provide the necessary justification for the proposed alternative use.~~

Policy O3: Temporary ‘Meanwhile’ Use of Offices

1. Temporary use of vacant office buildings and sites (‘meanwhile’ uses) will be permitted where the proposed use would not result in adverse impacts on the amenity of the surrounding **uses area** or the primary business role of the City. **Where temporary P**permission ~~will be~~ **is** granted **it will be** for a period not exceeding 36 months and the site will revert to office use thereafter.
2. Residential development is not considered an appropriate meanwhile use and will not be permitted.

Reason for the policy

5.1.25. Where office buildings or sites are vacant, and development is not expected in the short term, 'meanwhile' or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained, subject to their impact on surrounding uses.

How the policy works

5.1.26. 'Meanwhile' uses will be granted **subject to conditions** for a maximum of 36 months, after which the use will revert to office use. ~~This time period will be set out in conditions attached to any planning permission granted.~~ Applications to extend the period of the 'meanwhile' use or make it permanent will **be considered against the criteria in Policy O2 and will** not be permitted unless it is demonstrated that ~~there would be no adverse impact on the business City and that~~ the **permanent** loss of office floorspace is acceptable.

5.2. Retailing

Context

5.2.1. Retailing ~~provides an~~ is important ~~service~~ for all the City's communities – but retail demand is largely driven by City workers. ~~The predominance of workers in the City~~ **This** has resulted in a **predominantly** five-day (Monday-Friday) trading week with footfall concentrated over weekday rush hours and lunch times. ~~The City is, however, becoming a 7 day a week destination, with more retail units catering for a growing~~ **Several locations also do cater for** week-end and evening trade; ~~this trend has been growing is necessary to ensure that the City becomes a 24 hour, 7 day a week destination..~~

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

5.2.3. The ways in which people shop and use retail facilities is changing and the City's retail offer needs to adapt to address changing consumer and leisure habits, **whilst also retaining a focus on centres as places to shop. Retail centres that provide a diverse range of shops, services and things to do are likely to be in a better position to compete with the growth of online shopping and be better placed to respond to changing retail demand. In the City, as elsewhere, there has been an expansion of leisure and entertainment uses, which can increase footfall at different times of the day and add to the visitor experience. Such uses are an important component of the City's overall retail mix,**

Strategic Policy S5: Retailing

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

1. Focusing new retail development in the PSCs and encouraging movement between them by enhancing the retail environment along Retail Links.
2. Supporting proposals that contribute towards the delivery of **a minimum of** 196,000 m² gross of additional retail floorspace across the City to meet future demand up to 2036.
3. Requiring major **retail shopping** developments **over 2,500m² gross floorspace** to be located within or near PSCs. Where suitable sites cannot be identified within PSCs, sites immediately adjoining the PSCs and in Retail Links should be considered. Other areas of the City will only be considered where no suitable sites are identified within or adjoining the PSCs and Retail Links.

4. Requiring a Retail Impact Assessment for schemes of 2,500m² **gross floorspace** and above outside PSCs. The cumulative impact of retail floorspace will be taken into account in the assessment of planning applications.
5. Giving greater priority to shops (A1 uses) within the PSCs, with a broader mix of retail **and appropriate town centre** uses on the peripheries of the centres and the Retail Links.
6. Supporting the provision of retail **and other town centre** uses that provide active frontages at street level across the City where they would not detract from the viability and vitality of the PSCs and the Retail Links.

Reason for the policy

- 5.2.4. Four Principal Shopping Centres (PSCs) have been identified which provide a variety of comparison and convenience shopping, **largely falling within the A1 use class**, in the City of London: Cheapside, Moorgate/Liverpool Street, Fleet Street and Leadenhall Market. Cheapside is considered to be the City's 'high street' and has seen the most significant retail development in recent years. ~~Liverpool Street~~ Moorgate/**Liverpool Street** PSC has **significant** potential to accommodate **significant** further retail floorspace, capitalising on the opening of the Elizabeth Line and becoming a key retail destination.
- 5.2.5. The floorspace target in Policy S5 is based on a Retail Needs Assessment which identified a need for 196,000 m² of additional retail floorspace up to 2036. The Assessment identifies the potential for significant retail growth in and around the PSCs, with a focus on potential growth around Moorgate/Liverpool Street. Some growth is also anticipated to come forward outside the PSCs, near them or along the Retail Links.
- 5.2.6. The PSCs are recognised in the London Plan as 'CAZ Retail Clusters' that accommodate a range of other commercial uses alongside the retail function. Beyond the PSCs, retail units are **more** dispersed across the City though many are on streets identified as Retail Links (see Figure 9), while others form convenient local centres or are isolated units.



Figure 9: Principal Shopping Centres and Retail Links – UPDATE TO REPLACE RETAIL LINK ALONG GOLDEN LANE WITH ALDERSGATE STREET/GOSWELL ROAD; ADD RETAIL LINKS FROM BISHOPSGATE TO PETTICOAT LANE AND SPITALFIELDS MARKETS

How the policy works

5.2.7. There are further opportunities to develop the City's retail offer, allowing for a broad mix of retail facilities while maintaining a predominance of A1 retail uses. The role and status of the four PSCs will be strengthened, **encouraging further A1 development**, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to pedestrian links and the retail offer within the Retail Links will encourage shoppers to move between the PSCs **by making these connecting routes more interesting and convenient to explore**.

5.2.8. Major retail development, **defined as development over 2,500m² gross floorspace**, should locate within PSCs, but where suitable sites are not available **should consider** sites on the edge of the PSCs or **on the** identified Retail Links **should be considered before other areas of the City**. Smaller scale retail **uses development** will be encouraged throughout the City, where **they it** provides an active frontage and facilities which meet the needs of the City's working population or **provide for the needs of** local residents. Particular encouragement will be given to A1 uses near to residential areas.

5.2.9. Active **retail** frontages should be provided at street level across the City. **Other appropriate town centre uses, including leisure uses, will be acceptable**

where they provide an active frontage. Retail uses may be permitted on upper floors of major commercial developments, including in tall buildings, **where they provide additional facilities which are accessible to the public and office occupiers.** ~~providing that the loss of office floorspace is acceptable under Policy O2.~~

Policy R1: Principal Shopping Centres

1. Principal Shopping Centres (PSCs) are ~~defined as~~ designated frontages on the Policies Map. Sites or buildings that **contain form part of** a designated frontage are considered to be part of the PSC in their entirety.
2. **The role of the PSCs as concentrations of A1 shopping will be retained. Within PSCs** ~~the~~ The loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision, **predominantly A1 shops,** of varied unit sizes and frontage lengths will be encouraged. Proposals for changes between retail uses within the PSCs will be assessed against:
 - the contribution the unit makes to the function and character of the PSC; and
 - the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage
3. Proposals for the change of use from shops (A1) to other Class A **and appropriate town centre** uses at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre or amenity.

Reason for the policy

- 5.2.10. The frontages of the four PSCs are defined on the Policies Map. Concentrating major new retail development in or near PSCs will ensure that their vitality and viability is maintained and will provide an opportunity to focus retail facilities in the most appropriate areas of the City, enhancing these as shopping destinations for City residents, workers and visitors. In accordance with the definition of PSCs set out in this policy, a sequential or retail impact assessment will not be required for retail development on any site or building that contains a designated frontage.
- 5.2.11. Retailing comprises shops (A1), financial and professional services such as banks (A2), restaurants and cafes (A3), drinking establishments (A4) and hot food takeaways (A5). **Retail uses within the PSCs are predominantly A1 uses and the City Corporation considers that this predominance should be retained.** When considering proposals for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, units that are large or in prominent locations should be retained in A1 use.

How the policy works

- 5.2.12. The net loss of ground floor **A1 uses within the PSCs will be resisted. The net loss of other** retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will **also** be resisted. **Exceptionally, permission may be granted for non-retail, appropriate town centre uses such as leisure in the PSCs, providing these are complementary to the core retail offer and incorporate active frontages with an element of retail sales space.** A1 units at upper floors and basement levels may contribute to the retail provision of PSCs. However, it is recognised that pressure on ground floor shop units may be reduced by locating other retail **and town centre** uses at non-ground level. Change of use from shops to other retail **or town centre** uses at upper floors or basements will be assessed in relation to the contribution the unit makes to the character of the PSC and the effect of the proposed entrance and use on the ground floor frontage. ~~This policy refers to individual retail units facing PSC frontages and not to multi-level shopping centres.~~
- 5.2.13. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, **whilst retaining a predominance of A1 uses.** Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.
- 5.2.14. Each PSC in the City has an individual character, **which is described below, and which** will be considered in the implementation of policy:

Cheapside

- 5.2.15. Cheapside is **currently** the largest PSC in the City and serves a wider catchment area than the other centres. The PSC includes Bow Lane, **and** the ground floor of One New Change, ~~as well as~~ Cheapside **and Poultry itself.** The PSC has undergone significant redevelopment ~~in recent years since 2011~~ and the strategy ~~now~~ is to reinforce its role and character as the City's 'High Street', maintaining a clear predominance of A1 units with a focus on comparison goods and food and drinks provision. There is scope for greater weekend trading and for some additional retail floorspace, particularly to link the western part of Cheapside with Culture Mile. **Timed restrictions on vehicular access to The Bank Junction highways** and **the potential for future** public realm improvements offer an opportunity to achieve greater pedestrian movement and retail links between Cheapside and retail activity within the Royal Exchange and further east.

Fleet Street

- 5.2.16. Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers and residents with a limited number of premises opening in the evenings or at weekends. The PSC has a linear form and the busy road **creates a poor environment and** acts as a barrier to pedestrian permeability. Improvements to the public realm would help to improve the **environment and the** visitor and shopper experience. The current retail stock is largely A1 food retail, and there is an opportunity to capitalise on the comparatively lower rents. Fleet Street's

outstanding heritage and development opportunities to develop a more distinctive retail mix in this PSC. There is some capacity for additional retail provision between Fleet Street and Holborn and there is scope to strengthen retail links with Cheapside.

Leadenhall Market

5.2.17. Leadenhall Market PSC is centred on the iconic Victorian market building, but ~~it~~ **also** includes several surrounding streets. The PSC is located ~~at~~ **within** the southern ~~end~~ **part** of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The historic **Grade II* listed** market building is ~~also visited by a relatively high proportion of tourists a tourist destination~~ and so evening and week-end trading is encouraged. The character **and significance** of the historic market will be maintained and enhanced as a visitor and retail destination, supporting a flexible range of retail uses with an emphasis on food and **beverage drinks**. Increased demand arising from the expanding **City Cluster** workforce ~~near the area~~ will be met through larger, modern units in the surrounding streets which act as gateways to the market. Additional retail will **also** be provided by active retail frontages to new office development in the area.

Moorgate/Liverpool Street

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

Policy R2: Retail Links

Within the Retail Links, the net loss of retail frontage and floorspace will be resisted and additional retail development will be supported. A mix of shops and other retail **and town centre** uses will be permitted in the Retail Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

Reason for the policy

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

How the policy works

- 5.2.20. The Retail Needs Assessment **Study** identified the need for approximately 85,000m² of additional retail floorspace in the 'rest of the City' outside the PSCs. The **Study Assessment** highlighted two areas that should be a priority for new floorspace outside the PSCs: Farringdon/Culture Mile and Eastcheap/Monument. Delivery of new retail floorspace at Eastcheap/Monument could help to meet some of the demand arising from office development in the City Cluster which cannot be accommodated within the Leadenhall Market PSC and would provide more vibrant links towards the Pool of London.
- 5.2.21. While the Retail Needs Assessment **Study** concluded that the Retail Links continue to play an important role in meeting demand, it advocated a different occupier mix in these areas compared to the PSCs in order to avoid drawing visitors away from the prime PSC streets. Comparison goods shopping should **continue to** be focused in the PSCs to maintain the health of the City's core retail offer.
- 5.2.22. While the mix of uses in the Links should include A1 shops, a variety of other retail **and town centre** uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through **litter**, noise, disturbance and odours.. **All proposals for change of use in the Retail Links will be required to incorporate active frontages at street level.**

Policy R3: Ground floor retail provision elsewhere in the City

1. Retail uses will be **permitted encouraged** at ground floor level **across the City** provided**ed** they:
 - include active frontages onto the street;
 - do not impact adversely on the amenity of residents, workers and visitors;
 - do not impact adversely on the operation of office premises; and
 - would not adversely affect the vitality and viability of the PSCs or Retail Links.
2. The loss of A1 units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.

Reason for the policy

- 5.2.23. Retail units outside of PSCs and Retail Links provide local facilities for the City's workforce, enhance the City's vibrancy, and may serve the City's residential communities. **Given that most of the City's retail provision is tailored towards City workers, it is important to retain A1 units such as convenience stores that are within easy walking distance of the residential areas.**

How the policy works

5.2.24. The provision of new retail units, particularly A1 units, at ground floor level in existing and new development will be **supported encouraged** where these units do not have an adverse impact on the operation of office premises, provide an active frontage onto the street and do not have an adverse impact on the amenity of residents, workers or visitors by reason of noise, smells or fumes from the operation of the unit or servicing and deliveries. Use of ground floors for retail offers the opportunity to create more permeable buildings which can assist in reducing pressure for space on City streets.

Policy R4: Specialist Retail Uses

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

Reason for the policy

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

How the policy works

5.2.26. The City Corporation will resist proposals which result in the permanent loss of specialist retail uses. ~~Where redevelopment is proposed, the~~ replacement of specialist facilities on the same site will be **required where they are impacted by development proposals.**

Policy R5: Markets

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

- are of an appropriate scale and frequency for their location;
- would not have a significant adverse impact on the vitality and viability of existing retail centres within or outside the City;
- would not have a significant adverse impact on the amenity of nearby residents or business occupiers; and
- **would not involve the permanent loss of open space or harm the character of that space.**

Reason for the policy

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

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

How the policy works

5.2.29. There is an increasing demand for temporary retail pop-ups and street food markets, such as the Guildhall Yard Lunch Market, which can support the local economy by generating increased vibrancy, **retail diversity** and footfall. **Where these uses are located within a building or its curtilage, they should be ancillary to and complement the main use of the site.** When assessing proposals for new markets and pop-ups, the City Corporation will consider the potential for significant adverse impacts on existing retail centres within the vicinity ~~or on~~ **together with impacts on** the amenity of nearby residents or business occupiers, ~~or~~ on pedestrian and vehicular movement **or on open spaces.**

5.3. Culture, Visitors and the Night-Time Economy

Context

- 5.3.1. London has long been recognised as one of the world's great cultural cities, ~~but it is less widely known that~~ The City of London contains a huge concentration of arts and cultural facilities, which contribute to its the uniqueness of the Square Mile and complement its the primary business function of the City. These facilities include galleries, theatres, museums, heritage attractions, Livery Halls, libraries, places of worship and concert halls. In recent years a growing number of night-time entertainment facilities such as clubs, bars and event venues have ~~also~~ located in the City, alongside the traditional historic public houses. Research undertaken for the City Corporation ~~suggests~~ shows that growth in creative industries in the City between 2010 and 2016 has outpaced growth elsewhere in London and the UK.
- 5.3.2. The City's cultural offer is recognised as ~~has become~~ increasingly important and is ~~now~~ an integral element of the Square Mile, alongside the business City. The Barbican is identified as a ~~Ss~~ strategic Cultural Area night-time location of national or international significance while Cheapside and Liverpool Street are identified as night time areas of more than local significance in the London Plan, ~~and t~~ The City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section.
- 5.3.3. The City Corporation has prepared Visitor and Cultural Strategies that promote the City as a high-quality visitor destination with an emphasis on world-class cultural facilities. It is estimated there are approximately ~~18~~ 21.5 million business and leisure ~~visitors~~ visits a year to the City and this is expected to continue to grow as a result of an increased cultural offer and improvements to transport accessibility such as the Elizabeth Line and Bank Station upgrade. Suitable facilities and hotel accommodation are required to provide visitors with a pleasant experience whilst in the City.
- 5.3.4. Cultural and creative activity can contribute significantly to the quality of the environment and cultural experience, particularly where it enhances a sense of place. Public art can mitigate the impacts of development by the creation of works giving visual pleasure and helping to re-establish local identity and sense of place.

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

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

- Providing, supporting and further developing a wide range of cultural facilities across the City, and delivering a major destination for culture and creativity in the north west of the City through the Culture Mile initiative;
- **Requiring developers to submit Cultural Strategies for major development outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer;**
- Protecting **and enhancing** existing cultural **buildings and** facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City;
- Supporting the development of creative enterprise through appropriate workspace and digital infrastructure, particularly within Culture Mile;
- Allowing hotel development where it supports the primary business or cultural role of the City, and refusing new hotels where they would compromise the City's business function or the potential for future business growth;
- Enabling a vibrant evening and night-time economy, while **ensuring that operators proactively managing manage** night-time entertainment premises to minimise potential **disturbance impact** to residents and workers;
- Maintaining the City's existing collection of public art and culturally significant objects and pursuing opportunities to commission new, high quality pieces in appropriate locations;
- Maintaining and developing the City's open spaces and **or** streetscape to accommodate cultural events and activities that are accessible to all City communities and which celebrate the City's unique cultural offer.

Reason for the policy

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

5.3.6. **The City's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to reposition the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces**

in between. Culture is seen as being for everyone and is a driver of social mobility.

How the policy works

5.3.7. The City Corporation will require proposals for new development and changes of use to protect existing arts and cultural facilities where they are needed and require appropriate replacement. The City Corporation will work with developers and cultural and arts institutions to deliver new facilities where they support the City's Culture Mile ambition or enhance the attractiveness of the City as a business and cultural destination.

5.3.8. **Developers will be required to submit Cultural Strategies as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.**

Policy C1: Protection of Existing Visitor, Arts and Cultural Facilities

1. The City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless:

- replacement facilities **of at least equivalent quality** are provided on-site or within the vicinity which meet the needs of the City's communities; or
- the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
- it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2. Proposals resulting in the loss of visitor, **heritage**, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where **this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where** it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, **heritage**, arts or cultural use at reasonable terms for such a use.

Reason for Policy

5.3.9. The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition **for buildings and sites** from commercial uses ~~because of the high land values~~ in

the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed, before a site will be allowed to change use.

- 5.3.10. There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls (unique to the City), historic public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches, ~~heritage attractions~~ and specialist retail premises such as the Silver Vaults in Chancery Lane. ~~The policy does not apply to hotels.~~

How the policy works

- 5.3.11. Applicants will be required to demonstrate that an existing visitor, ~~heritage~~, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use). Marketing will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.
- 5.3.12. The City Corporation has published guidelines for determining nominations for Assets of Community Value in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest. In determining whether a public house has heritage, cultural, economic or social value, the City Corporation will have regard to those guidelines as well as the characteristics outlined in the London Plan.

Policy C2: Provision of Visitor Facilities

The provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm

, will be encouraged, including:

- seating, ~~benches~~ and tables ~~that can be used for resting and other activities~~;
- structures and landscaping to enable children's play and provide facilities for school groups;
- suitable shelter from weather conditions ~~including heat and rain~~;
- well-designed public convenience provision, including changing places toilets, which is accessible to all users;
- well-designed signage, way finding and links to visitor facilities and destinations;

- temporary pop-up art installations in appropriate locations;
- performance spaces **and animation of key routes** where appropriate.

Reason for the policy

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

How the policy works

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

Policy C3: Hotels

1. Proposals for hotels and other visitor accommodation will be permitted providing they:

- do not result in the loss of viable office accommodation for which there is continuing need, as set out in Policy O2;
- do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- include a range of **complementary** facilities accessible to the public;
- provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, **waste storage, and** taxis ~~and coaches~~, appropriate to the size and nature of the development;
- are inclusive, ~~providing a minimum of 10% of hotel rooms to wheelchair-accessible standards~~ **meeting London Plan accessibility standards for new hotel bedrooms;**
- ensure continuing beneficial use for historic buildings, **including enhanced public access to and interpretation of that heritage,** where appropriate;
- **address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).**

~~2. Proposals for new hotels and other visitor accommodation will be resisted where they would result in an over-concentration of similar uses in the surrounding area.~~

Reason for the policy

- 5.3.15. While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in ~~2017~~ **2019** had ~~34~~ **38** hotels, apart-hotels and hostels, providing ~~56~~,100 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. This demand is driven by a predicted increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City's predicted share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood of the City meeting the London Plan requirement.
- 5.3.16. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for hotels for business accommodation will therefore increase. Visitor numbers are ~~also~~ predicted to increase, and the development of Culture Mile is likely to increase demand for hotel accommodation particularly in the north west of the City ~~which currently has very few hotels~~.
- 5.3.17. There is, however, a need to ensure that hotel development does not prejudice the primary business function of the City by displacing sites that are suitable for office accommodation. **Hotel proposals will need to demonstrate that there would not be a loss of suitable and viable office floorspace, in accordance with Policy O2 and the Office Use SPD.**
- 5.3.18. **Hotel development can be particularly suited to listed buildings, providing an alternative use which enables significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved public access to and interpretation of the building's heritage.**
- 5.3.19. Hotels can ~~also~~ cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. **New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers.** Where new hotels are considered to be acceptable, they should enable the public to access facilities such as co-working space, meeting rooms, restaurants or leisure facilities in order to bring the maximum benefit to the City's communities.
- 5.3.20. ~~Proposals for new hotels and other visitor accommodation will be considered more favourably in Culture Mile (see Policy S23) and are not appropriate in the City Cluster (see Policy S20).~~

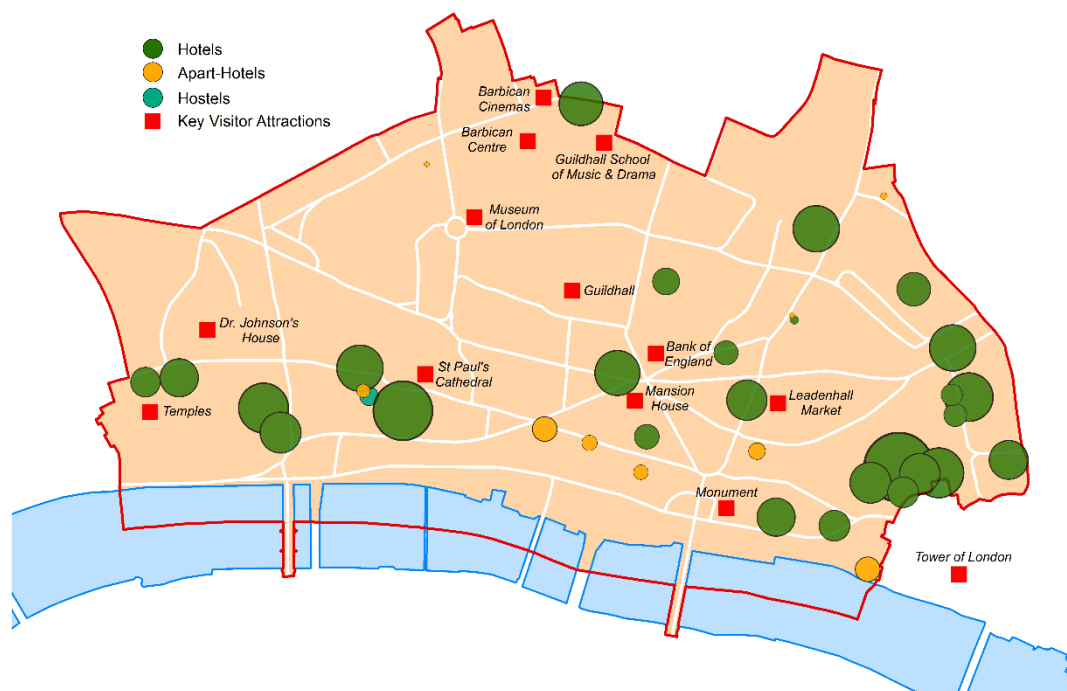


Figure 10: Hotel and visitor attractions distribution 2018 UPDATE TO 2019 BASE

How the policy works

5.3.21. Policy C3 applies to hotels, apart-hotels and serviced apartments.

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

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

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

5.3.24. For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term

visitors to the City and **may prejudice the business City and would** put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

Policy C4: Evening and Night-Time Economy

1. Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
 - the amenity of residents and other noise-sensitive uses;
 - environmental amenity, taking account of the potential for noise, disturbance, **waste** and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
2. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises **and are encouraged to engage with nearby residential and commercial occupiers**.
3. Where new residential development is proposed close to existing evening or night-time uses, the residential development will only be permitted if it includes suitable measures to mitigate potential ~~noise and~~ disturbance **and noise and air quality issues for** prospective residents.

Reason for policy

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

How the policy works

- 5.3.27. The City Corporation will ~~apply the principle that require~~ the development responsible for change ~~is responsible for to managing~~ the impact of that change – the 'Agent of Change' principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any

undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.

- 5.3.28. Night-time entertainment uses in the City include restaurants and cafes (A3), drinking establishments (A4), hot food takeaways (A5) and other related uses including, for example, a nightclub or a mix of such uses. They form part of the City's wider night-time economy. **which includes 24-hour trading with other financial centres around the globe.**
- 5.3.29. The **control management** of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance.
- 5.3.30. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment. This is supported by the City Corporation's Code of Good Practice for Licensed Premises. The City Corporation's **has also published a Noise Strategy which** sets the strategic direction for noise policy within the City of London and outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.
- 5.3.31. The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in complaints about disturbance and nuisance from excessive noise, particularly from people drinking and smoking outside, and arriving or leaving. **Policy SSC2 (Dispersal Routes) requires applications for night-time uses to include Management Statements setting out proposals for the dispersal of patrons.**
- 5.3.32. All planning applications for A3, A4, A5, and related, uses should include information stating the proposed hours of operation. **~~Where this information is not provided, or hours of operation have not yet been confirmed, t~~**The City Corporation **~~will~~ may** impose conditions requiring the closure of the premises between the hours of 11pm and 7am **where appropriate. unless further permission to vary these times is sought and granted.**
- 5.3.33. Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are **encouraged expected** to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local

sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. **Policies HIC3 and H3 deal with noise and light pollution, and the residential environment respectively.**

5.3.34. **Planning applications Proposals** for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:

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

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

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

Policy C5: Public Art

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

- encouraging the provision of new artworks in appropriate locations in the City on public and private land;
- protecting existing works of art and other objects of cultural significance **and encouraging the provision of additional works in appropriate locations;**
- ensuring that financial provision is made for the future maintenance of new public art;
- requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

2. The location of new and relocated artworks must:

- take into consideration the health and safety of pedestrians, **particularly those with disabilities,** and other road users;
- avoid the proliferation of public art where the cumulative impact may have a detrimental effect on surrounding buildings and public realm.

Reason for the policy

5.3.37. Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place **and local identity.** ~~Public art can mitigate the impacts of development by the creation of works giving visual pleasure and helping to re-establish local identity and sense of place.~~ In this way, public art is a form of community infrastructure. Public art includes temporary installations **as well as and** non-physical works such as soundscapes.

5.3.38. **Where appropriate, artworks should be multi-functional so that a variety of community needs can be met. Artworks can provide shelter from the weather, include sensory elements and provide play opportunities.**

5.3.39. There are several arts events held regularly in the City including Sculpture in the City which **enables forms a free public trail of** works of art ~~to be located~~ throughout the City.

5.3.40. The quality of proposed public art must respect, and not detract from, ~~the form and quality of~~ the surrounding environment. Objects of cultural significance can include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.

5.3.41. Due to the increase in public art in the City, issues have arisen in terms of appropriate siting, and whether works of art should be time limited to avoid inappropriate proliferations. Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided, and consideration given to ensuring that people with visual or mobility impairments are not placed in

danger. Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers.

How the policy works

- 5.3.42. The City Corporation has operated a City Arts Initiative (CAI) group since 2012, which advises on the artistic merit, siting, setting and appropriateness of **all new** public art proposals in the City. Temporary works of art (in situ for less than 8 weeks), **which do not require planning permission**, will be considered by the CAI group.
- 5.3.43. Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design **of development and** ~~Applicants~~ **should must** work with artists at ~~the outset of a development an early stage of design. rather than commissioning them to create an art work post construction.~~ Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal agreement. Where works of art are ~~part of a development or are~~ on private land, it is expected that those pieces will be maintained to a high standard by the landowner. **The City Corporation may seek contributions through s106 obligations towards the provision of new public art and the future maintenance of public art.**
- 5.3.44. Where it is considered that a proliferation of public art is having a detrimental impact on the public realm within a particular area the City Corporation may impose limits, through conditions, on the length of time that an artwork can remain in situ.

5.4. Smart Infrastructure and Utilities

Context

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

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

Strategic Policy S7: Smart Infrastructure and Utilities

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

Reason for the policy

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

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

How the policy works

5.4.4. The City Corporation has established strong links with the various infrastructure providers that service the City, including Thames Water, UK Power Networks, **National Grid (gas), Cadent Gas, Citigen CCHP** and telecoms providers. The City Corporation will seek to retain and strengthen these links, working with **all** providers and regulators, where appropriate. Developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.

Policy SI1: Infrastructure provision and connection

1. Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for:
 - Electricity, gas and water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands. Temporary Building Supply for the construction phase should be identified in conjunction with electricity providers including the estimated load capacity, substations and route for supply;
 - Heating and cooling demand and viability of provision via decentralised energy networks. Designs must incorporate connections to existing decentralised energy networks where feasible;
 - Digital and telecommunications network demand, including full fibre wired and wireless infrastructure in line with the Mayor of London's 'Wired Score' connectivity rating or equivalent, planning for dual entry through communal entry chambers and flexibility to address future technological improvements;
 - Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
2. To avoid delays to prospective tenants, developers should consider pre-installing fibre optic and other communications networks into the new development.

3. Developers should conduct mobile signal tests within the development and consider the need for in-building mobile solutions where coverage is poor.
4. **Development should aim to avoid reducing mobile connectivity in surrounding areas, and if that is not possible suitable mitigation measures will be required. Provision should be made on buildings or in the public realm to accommodate well-designed and located mobile digital infrastructure.**

Reason for the policy

- 5.4.5. The dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and heating and cooling via the Combined Cooling Heating and Power (CCHP) network are of particular importance. Congested cable routes traverse the City under its streets. Energy demands are increasing, particularly to provide air conditioning to counter increased warming and the delivery of upgraded ICT networks required by financial and business services.
- 5.4.6. The City's Infrastructure Delivery Plan will set out in more detail the infrastructure projects that are under construction or required.

How this policy works

- 5.4.7. Developers must liaise with utility providers and adopt best practice in assessing and improving connectivity within developments. Connection layouts and future proofing should be considered in the design of the development.
- 5.4.8. **Addressing air pollution is a fundamental concern for the City Corporation.** Developers **should must** engage with energy providers prior to commencement of development works to ensure the availability of Temporary Building Supplies, avoiding the need for diesel generators to provide electricity.
- 5.4.9. Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors. Developers must co-operate with infrastructure providers to minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction.
- 5.4.10. It is **essential important** for the City to be digitally connected and responsive to the changing requirements of business, and for buildings to be equipped to meet the needs of current and future occupiers. Developers will be expected to undertake an assessment of the connectivity of major new office buildings or refurbishments, using a wired certification such as WiredScore. Development should result in an improvement in the City's digital connectivity **and not worsen existing provision or signal strength.**
- 5.4.11. **Mobile connectivity within and around buildings is also critical to the City of London. Developers will need to ensure that their buildings do not worsen existing signal strength in the area and consider the provision of in-building solutions where signal strength is poor. The roll out of 5G across the City will require additional mobile infrastructure and suitably located cells. Where**

feasible provision for new cells should be incorporated into new development. Where this is not feasible, provision should be made for additional cells to be located in the public realm, including on existing street furniture.

- 5.4.12. The City Corporation will encourage the improvement and extension of utilities networks to ensure that the City ~~is at the forefront of the Smart City agenda~~ **uses the latest technology** and continues to provide good quality services for businesses, residents, students and visitors. The City Corporation's 'City Developer Guidelines for Incoming Utility Services' provides guidance on best **practice**.

Policy SI2: Infrastructure Capacity

1. Development must not lead to capacity or reliability issues in the surrounding area and capacity projections must take into account the impacts of climate change which **may will** influence future infrastructure demand.
2. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to facilitate appropriate improvements which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.
3. Developers are required to demonstrate, through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation.

Reason for the policy

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

How this policy works

- 5.4.14. The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and **may should** include evidence of engagement with providers.
- 5.4.15. Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote **and contribute towards** a low-carbon based economy, through smart buildings and incorporating alternative solutions into the design. It **may will** be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure, **which. This may include involve studies being** undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.
- 5.4.16. Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in under-utilisation of infrastructure. The

cumulative impacts should be considered through discussion with providers and pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.

5.4.17. Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.

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

Policy SI3: Pipe Subways

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

Reason for the policy

5.4.19. Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways ~~is being considered in order to~~ **would** provide greater capacity for pipes and cables and reducing the need for street works which often cause disruption. Pipe subways accommodate gas and water mains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then inaccessible.

How the policy works

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

6. Shape Outstanding Environments

6.1. Design

Context

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

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

6.1.3. To realise the City Corporation's vision for the Square Mile, the design of the built environment should contribute towards the delivery of a competitive and creative City with exemplars of sustainable building design. Development should contribute towards the aim of achieving a zero emission and climate resilient City **by 2050 in accordance with the London Plan.**

Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces, seeking design solutions that make effective use of limited land and contribute towards a zero emission City **and the well-being of the City's communities**, through development which:

Form and Layout

1. Optimises pedestrian movement by maximising permeability, providing external and internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
2. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;

3. **Delivering Delivers** publicly accessible space ~~at the upper levels of buildings within the building~~ by maximising the amount of accessible and free to enter roof terraces and spaces, including in tall buildings and along the river and around City landmarks; and
4. **Delivering Delivers** world class sustainable buildings which are mixed-use, **resilient**, adaptable, adopt circular economy principles and contribute towards a zero emission, zero carbon and climate resilient City.

Experience

5. Optimises micro-climatic conditions, addressing solar glare, daylight and sunlight, ~~and uncomfortable~~ wind conditions and thermal comfort and **delivering delivers** improvements in air quality, open space and views;
6. Delivers street level building frontages ~~so that they~~ which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
7. Optimises the amount of green infrastructure and amenity space **designed as** integral to the architecture, enhancing public access to nature and biodiversity through maximising the **amount** provision of green roofs, walls and trees; and
8. Delivers inclusive buildings, streets and spaces ~~to that~~ meet the access needs of all the City's communities.

Quality and character

9. Delivers high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the ~~City's~~ local and wider character and appearance of the City and its neighbours;
10. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
11. Considers lighting as an integral ~~to part of~~ the design process, **considering addressing** issues of light spill/trespass to the public realm and the character of the ~~of the~~ area;
12. Incorporates signage ~~is~~ of an appropriate siting, size, form, appearance and illumination, ~~and successfully integrating it into~~ within the architecture of the building;
13. Incorporates necessary security and safety measures as an integral part of the design; and
14. Ensures that the building design concept is maintained from permission through to completion of a project.

Reason for the policy

- 6.1.4. As a world leading financial and **business professional services** centre, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings.

How the policy works

- 6.1.5. To create a zero-emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.
- 6.1.6. **The City of London will continue to be at the forefront of delivering the highest and most sustainable design standards.** All development should **meet the highest standards of urban design, demonstrate how it delivers the highest standard of design** while also respecting its surroundings and the unique character and history of the City. Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. The diversity of the townscape means that different design considerations apply to each site and these need to be carefully assessed to take account of each building's context. This should not constrain design approaches, and a range of solutions may be appropriate.
- 6.1.7. **The City Corporation will use a variety of modelling techniques to assist in the determination of planning applications. Developers will be required to use modelling techniques to demonstrate compliance with the City Corporation's microclimate and thermal comfort planning advice notes. The City Corporation will use 3D modelling technology to assist in considering the visual impact of development, enabling an assessment to be made of the impact of development on townscape and skyline. Developers will be required to provide 3D visualisations of their developments in a format compatible with the City Corporation's 3D modelling technology.**
- 6.1.8. The City has a large workforce whose numbers are expected to grow substantially. Most journeys within the Square Mile are on foot and pedestrian movement is particularly high during morning and evening peak times. The City has retained much of its historic street pattern, which provides convenient walking routes and allows for a high degree of pedestrian permeability. The City Corporation uses pedestrian modelling to better understand pedestrian flows and to manage the impact of proposed new development. **The Transport Strategy sets standards and targets for pedestrian accessibility which will be implemented, in part, through this Plan.**
- 6.1.9. Outdoor advertising has a significant impact on the appearance of buildings, the street scene and, in particular, the historic environment. The City Corporation's long-standing approach is to restrain advertisements in terms of size, location, materials and illumination as a means of safeguarding the high quality of the City's environment.

- 6.1.10. The City has numerous small open spaces, which provide valuable amenities, many of which are of historic importance. The design of these small spaces requires innovative and sensitive **design** solutions which respect their settings and create high quality, accessible areas for all the City's communities. The City's streets provide space for public enjoyment, and the City Corporation has a programme of public realm enhancement projects to improve the quality, sustainability, inclusivity and amenity of the public realm.
- 6.1.11. The City provides significant employment, **residential** and leisure opportunities that should be accessible to all. Accessibility to new and existing buildings and spaces must ~~be maximised to~~ create an inclusive environment. Adaptation of historic buildings presents particular challenges and requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and will prepare guidance for developers.

Policy D1: Sustainability Standards

1. All development must demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development.
2. Proposals for major development will be required to:
 - achieve a BREEAM rating of "excellent" or "outstanding" against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City's priorities (energy, water, pollution and materials);
 - demonstrate that London Plan carbon emission and air quality requirements have been met on site. In exceptional circumstances where standards cannot be met on site offsetting will be required to account for the shortfall;
 - demonstrate climate resilience in building and landscape design;
 - incorporate collective infrastructure such as heating and cooling networks, smart grids and collective battery storage wherever possible, to contribute to a zero-emissions, zero-waste, climate resilient City.

Reason for the policy

- 6.1.12. The drivers for sustainable development are increasing, affecting global and local businesses, workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City's priorities:
- Energy, carbon emissions and air pollutants – reducing emissions and moving to a zero emissions **and zero carbon** city **by 2050, in line with London Plan requirements**;
 - Water – reducing water use in an area of serious water stress;

- Pollution – reducing exposure to poor air quality;
- Materials – reducing embodied carbon and improving resource efficiency.

- 6.1.13. Social and environmental responsibility is high on the agenda for many City businesses and their workforce. A working environment that supports these goals is essential to attract the City's future businesses. The London Plan provides a framework for driving forward this agenda but must be implemented at a local level.
- 6.1.14. The City of London Zero Emissions Study 2018 provides evidence for the trajectory to a zero emissions City. The role of collective infrastructures such as smart grids, battery storage, **and** heating and cooling networks **and hydrogen infrastructure** are highlighted as essential elements of a future zero emissions City, where decarbonised electricity, that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels **and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides**. Therefore connection to these networks is expected wherever feasible.

How the policy works

- 6.1.15. The **requirement for the highest feasible and viable sustainability standards policy** applies to all development in the City, including major new development, extensions to existing buildings, **other major refurbishments** and minor development. Refurbishments of existing buildings are **also** subject to this policy where proposed works constitute development. Standards required are those that are in place at the time of submission of a planning application.
- 6.1.16. Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development., **~~demonstrating that the design meets the highest feasible and viable standards.~~**
- 6.1.17. For major development the Sustainability Statement should include:
- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
 - an energy assessment in line with the Mayor's Energy Planning Guidance. Where carbon offsetting is required this will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects in the City or elsewhere.
 - an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.

- details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.

Extensions:

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

For minor development

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

Policy D2: New Development

1. Development should be of a world-class standard of design and architectural detail and enhance the townscape and public realm. **Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.**
2. The design of all new development must ensure that:
 - The bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area, enhancing pedestrian permeability;
 - Appropriate, high quality, **sustainable** and durable materials are used;
 - The design and materials avoid unacceptable wind **and thermal comfort** impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
 - Development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
 - Proposed uses can be accommodated within the curtilage of the development and do not rely on use of the public realm;
 - Plant and building services equipment are fully screened from view and integrated into the design of the building; **Installations that would adversely**

~~affect the character, appearance or amenities of the buildings or area will be resisted;~~

- Servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- There is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening;
- Buildings are inclusive and accessible to all; and
- **Opportunities are taken to enhance the appearance of the roofscape.**

Reason for the policy

6.1.18. The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are characteristic of, and combine to produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

How the policy works

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

6.1.20. Wind conditions and solar glare can have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions, **thermal comfort** and solar glare. Any adverse impacts will need to be mitigated and appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published **Planning Advice Notes on micro-climatic issues guidelines for developers on wind microclimate studies required to support planning applications. Further guidance is available on solar glare, solar convergence and sunlight impacts of development. The City Corporation will publish a further Planning Advice Note for developers on addressing thermal comfort in the public realm.**

6.1.21. The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated **with into** the design of

the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.

- 6.1.22. In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. ~~Features such as blank~~ frontages and ventilation louvres should be avoided. Ventilation louvres, where ~~required necessary~~, should be located away from busy streets. Servicing entrances should be carefully designed to minimise adverse effects on the townscape.
- 6.1.23. ~~The design of buildings~~ must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs. Proposed uses must not rely on the use of space in the public realm, including the use of public highway.
- 6.1.24. The City of London has many public and private viewing galleries, terraces and tall buildings, meaning that many workers, residents and visitors see the townscape from above. Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the building as viewed from surrounding buildings as well as from the ground. The potential to add visual interest to a roofscape, including greening, should be **actively considered designed in** from the outset of any scheme.
- 6.1.25. Where feasible, plant should be located below ground. Where this is not feasible, ~~additional roof top plant for an existing building it~~ should be satisfactorily integrated into the form and design of the ~~existing~~ roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. ~~All chimneys should terminate at the highest point of the building. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.~~ Consideration should be given to the use of external heating and cooling supplies from district heating and cooling networks, such as the Citigen network, where available, as these may avoid or reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms, as well as providing wider environmental benefits.
- 6.1.26. Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas. Gates and doors should be well designed and should be kept closed when the entrance to the service bay is not in use.

6.1.27. Ventilation or extraction systems should be routed internally and extensive or unsightly external ducting will **not normally** be **refused permitted**. Provision must be made within the building for services and ducting to and from all uses.

Ventilation louvres should not be sited by adjoining footways. Developments should incorporate suitable off-street facilities for smokers wherever possible to avoid the need for smokers to congregate on the pavements.

6.1.28. Developers should provide suitable rooftop ventilation for the City's sewer network, where appropriate, and this should be integrated into the design of buildings.

Policy D3: Public Realm

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of the streets and spaces between buildings and the creation of new spaces. Public realm schemes must be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- The predominant use and function of the space and adjacent spaces;
- The use of sustainable natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- The inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- The City's heritage, identifying and retaining features that contribute positively to the character, **cultural experience** and appearance of the City;
- The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate the implementation of rainwater recycling;
- The need to provide accessible and inclusive design **that meets the needs of different users**, ensuring that streets and walkways remain uncluttered and enhance pedestrian permeability;
- **The need to provide a** high quality, safe and functional public realm **that meets the needs of different users**;
- The sensitive co-ordination of lighting with the overall design of the scheme;
- The wellbeing of users in relation to air pollution, noise, temperatures, shading and microclimate.

Reason for the policy

6.1.29. The City Corporation will actively promote schemes for the enhancement of the street scene and public realm. High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the

City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

~~6.1.30. Further guidance on the implementation of public realm enhancement is set out in the City's Public Realm Supplementary Planning Document and the City Public Realm Technical Manual, and the Mayor of London's Streetscape Guidance.~~

How the policy works

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

6.1.32. All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City. **Consideration should be given to design features which prevent damage from the activities of skaters, such as metal studs incorporated into street furniture and hard surfaces.**

6.1.33. The incorporation of artworks or integral decorative features, such as sculptures, fountains and schemes included in the City Arts Initiative, to create animated spaces, will be encouraged. **Early consideration of and** their design, management and maintenance regime ~~should be considered at an early stage of the design is required~~. Detailed guidance is provided in Policy C5.

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

Policy D4: Pedestrian permeability

1. Improved way-finding will be sought through public realm improvements. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:
 - Providing **legible**, good quality, safe and low pollution pedestrian connections between spaces;
 - **Where feasible**, ~~P~~providing new pedestrian routes through buildings and development sites and respecting, maintaining and ~~where feasible~~ restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;
 - Providing publicly accessible ground floors for improved pedestrian movement, where feasible;

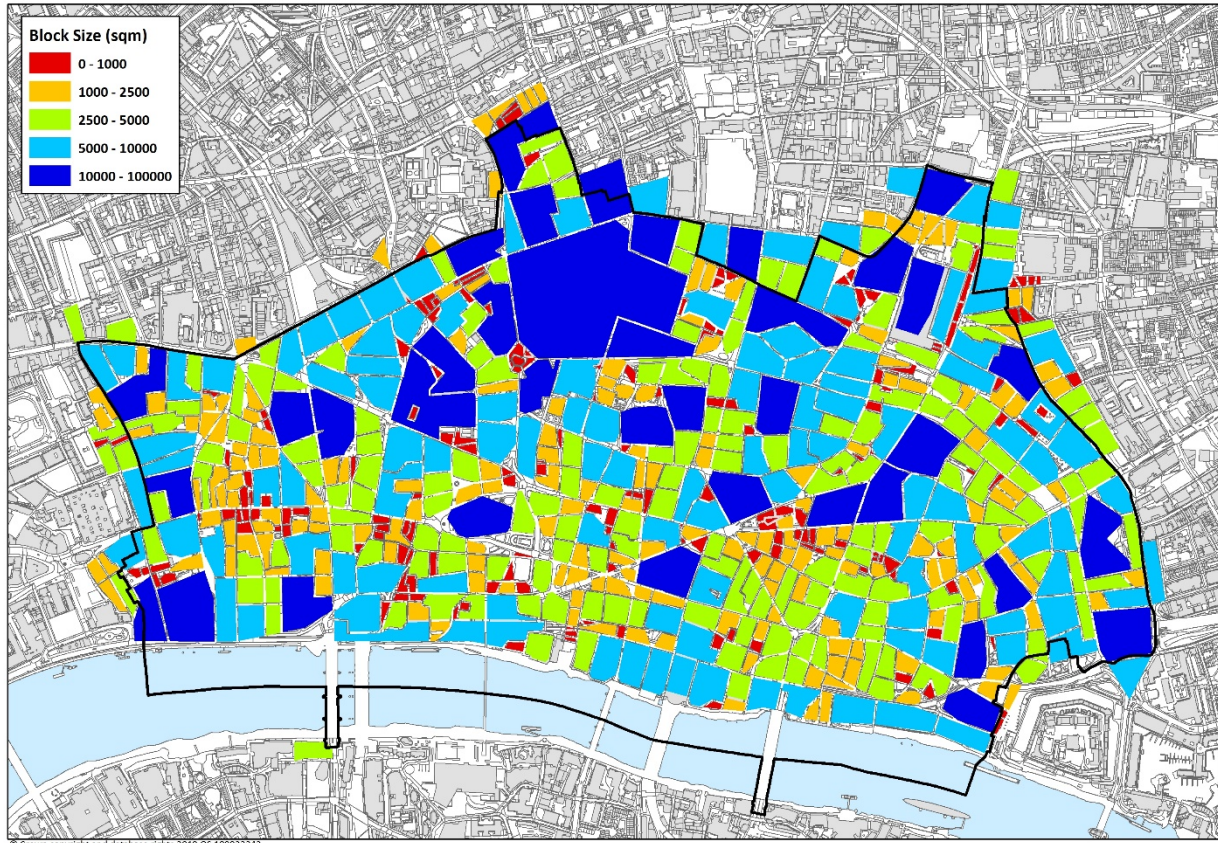
- Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.
2. Developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest.

Reason for the policy

- 6.1.35. The intensification of the use of buildings and the increase in the City's working population are putting added pressure on the capacity, convenience, comfort and safety of the spaces, streets, lanes and alleys at the heart of the City. Peak times are particularly busy for all forms of transport, and the potential for conflict between modes of travel is increased.
- 6.1.36. Most travel in and through the City is on foot. **The City Corporation has adopted Transport for London's Legible London as a means of improving wayfinding within and through the City of London.**

How the policy works

- 6.1.37. In order to reduce pedestrian congestion and improve pedestrian access through the public realm, new pathways for moving through the City will need to be created or re-established ~~if they were previously in existence~~. Spreading the footfall across a wider area will help to create a more vibrant and comfortable street network.
- 6.1.38. Development will be expected deliver net gains in the public realm, through the establishment of new pedestrian routes around and through buildings, having regard to the cumulative impact of their development alongside existing and permitted development on the capacity of pedestrian routes. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected and permeability of the City compromised. **The City Corporation has developed a block size analysis which identifies large impermeable street blocks across the City and this will be used to prioritise the identification of new pedestrian routes through development proposals.**
- 6.1.39. **Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totums, where necessary.**



NEW FIGURE - Figure xx: Block Size Analysis 2015

Policy D5: Terraces and Viewing Galleries

1. Roof terraces will be permitted providing:

- The **design of the roof terrace** is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;
- There would be no immediate overlooking of residential premises or significantly adverse impacts on residential amenity. **Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;**
- **Security risks are addressed at the design stage and space for security checks incorporated into the development, where required.**
- Historic or locally distinctive roof forms, features or structures are retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace maximises the potential for urban greening;
- Emissions from combustion plant will not affect users of the **roof garden terrace**.

2. The provision of free to enter, publicly accessible areas will be required as part of all tall building or major developments, which may include public viewing galleries at upper levels, where appropriate.

Reason for the policy

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

How the policy works

6.1.41. Proposals for roof gardens and terraces should be sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive. There should be no impact on strategic or locally protected views.

6.1.42. **Where** Roof terraces and gardens **should be are** publicly accessible **where possible and** entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. **Security implications should be considered at the design stage of the development, including making provision for security checks within the development, where required.** Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels to the surrounding area, and appropriate safety features should be included to prevent people from jumping or falling. **The City Corporation is producing guidelines to advise developers on best practice to reduce the potential for suicides from tall buildings.** The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.

6.1.43. Public access to the tall buildings found within the City of London is important in creating an inclusive City. Tall buildings should provide publicly accessible areas **at upper levels**, which are free to enter. These may include public viewing galleries **at upper levels** or other forms of open space provision, **or features such as and may provide** retail, leisure or educational facilities **to enhance their attraction.**

Policy D6: Shopfronts

Shopfronts should be of a high standard of design and appearance; inappropriate designs and alterations will be resisted. Shopfront proposals should:

- Respect the quality and architectural contribution of any existing shopfront;
- Maintain the relationship between the shopfront, the building and its context;
- Use materials which are sympathetic to the wider context and are of high quality;

- Ensure that signage is in appropriate locations and in proportion to the shopfront;
- Take into account the impact of the installation of louvres, plants and access to refuse storage;
- Ensure that awnings and canopies are positioned only in locations where they would not harm the appearance of the shopfront, ~~or~~ obstruct architectural features or views;
- Avoid openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity of the area;
- Avoid external shutters and ~~consider~~ contain alternative security measures, where required;
- ~~Consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance~~ Avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
- Ensure that the design ~~allows access by users, for example, is inclusive~~ incorporating level entrances and adequate door widths;
- Ensure that internal shop lighting does not create inappropriate light spillage into the public sphere.

Reason for the policy

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

6.1.45. Existing shopfronts ~~that~~ should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

How the policy works

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

6.1.47. ~~The design of new shopfronts should include a signage zone that is consistent across a parade of shops of matching or similar design.~~

6.1.48. Modification to shopfronts and shopfront designs incorporating louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building if they cannot be accommodated in less sensitive elevations. Awnings and canopies, where appropriate, should be integrated into the shopfront design in relation to size, location and materials.

6.1.49. ~~Fully~~ Openable shopfronts and large serving openings ~~are not normally~~ may be refused where acceptable as they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.

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

6.1.51. Retail entrances should be designed with level entrances to enable inclusive access by all. Access measures and movable ramps should **only** be used exceptionally where level entrance is not feasible.

Policy D7: Advertisements

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

Reason for the policy

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

How the policy works

6.1.53. Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the ~~restrained~~ character of the City. The display of poster advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however,

provide an opportunity to add interest to the street scene by including images and information about the development under construction. Further guidance is contained in the City Corporation's Hoardings Advice Note.

- 6.1.54. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should **avoid not include** static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, as a means of protecting visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.
- 6.1.55. Particular care will be necessary with **retailing** advertisements on or in the settings of listed buildings and within conservation areas. Internal illumination of adverts in such areas will not normally be permitted.
- 6.1.56. Advertisements above ground level are detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features **and the City's streetscape and skyline**. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 6.1.57. Appropriate action will be taken to have unauthorised advertisements removed. The Transport Strategy indicates that the City Corporation will ensure that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

Policy D8: Daylight and sunlight

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is **not reduced noticeably to unacceptable levels appropriate for its context and provides acceptable living standards**, taking account of the Building Research Establishment's guidelines.
2. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.
3. The design of development should incorporate measures to mitigate adverse solar glare effects on surrounding buildings and public realm.

Reason for the policy

- 6.1.58. The City is an urban centre with a very high density of buildings, **resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas.** ~~The impact of this density on surrounding areas can be to reduce levels of daylight and sunlight in the~~

~~surrounding area below that which would normally be expected. The City Corporation seeks to provide the best outcome in terms of sunlight and daylight, both for the development itself and the buildings in the vicinity, requiring design strategies that maximise the natural light potential.~~ The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.

How the policy works

- 6.1.59. The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Developers will be required to submit daylight and sunlight assessments in support of their proposals. The City Corporation may seek independent verification of these assessments at the developer's expense.
- 6.1.60. When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. Where appropriate, the City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. **The Mayor of London has indicated that guidance on daylight and sunlight standards will be produced to support the London Plan.**
- 6.1.61. Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered **acceptable in planning terms beneficial in the public interest** and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

Policy D9: Lighting

1. Lighting should be sensitively co-ordinated with the overall design of any new development, having regard to siting, scale, type, intensity and colour temperature of light. ~~Major dD~~ Development proposals must consider the lighting strategy early in the design process.
2. Development should incorporate measures to reduce the potential for light spillage from **external and** internal lighting, particularly where it would impact adversely **on** neighbouring occupiers, the wider public realm and biodiversity.
3. The external lighting of buildings should contribute positively to the unique character and grandeur of the City townscape by night.

4. External lighting of heritage assets within the City must be sympathetic to the wider context in terms of tone and brightness.

Reason for the policy

- 6.1.62. The City Corporation's Lighting Strategy contributes to the City Corporation's wider aims of improving the night-time offering and creating an after-dark street experience that befits a world class business **and cultural** centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.
- 6.1.63. Development has the potential to **positively or** adversely **alter affect** the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes can improve accessibility for those with disabilities by reducing glare and excessive contrast. In the City, the predominance of office buildings with glass frontages can lead to light spillage concerns for neighbouring residents with a potential impact on wellbeing. Avoidance of light spillage onto urban green spaces is crucial for biodiversity in the urban setting.

How the policy works

- 6.1.64. The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it adds to the overall experience of the area, celebrating and enhancing the unique atmosphere of the area, and providing orientation and wayfinding after dark.
- 6.1.65. The Illuminated River art project, to be implemented **fully** by 2022, will enhance the visual impact at night time through lighting of all 5 bridges located in the City. This will be complemented by a reduction in street lighting **found** on the bridges.
- 6.1.66. The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting **of historic buildings** and limit adverse effects upon adjacent areas, **and** uses **and biodiversity**.
- 6.1.67. **There is potential for badly designed lighting schemes to generate light pollution with adverse impacts on neighbours and the natural environment, as well as incurring unnecessary costs for the occupier. The design of lighting schemes should therefore be considered at an early stage in the development design process, having regard to the City of London Lighting Strategy. The City Corporation will prepare further planning guidance to assist developers in the design of appropriate lighting schemes.**

6.1.68. Detailed information on requirements for lighting can be found in the City **of London** Lighting Strategy.

6.2. Vehicular Transport and Servicing

Context

- 6.2.1. The City is served by an extensive public transport network with six mainline railway stations, 12 underground and DLR stations and an extensive network of bus routes. **Transport for London rates the whole of the City of London as having a Public transport Accessibility rating of above 6, the highest possible score.** In addition, major rail termini near the City are used by large numbers of City commuters. Significant improvements are being made to public transport provision, particularly with the opening of the Elizabeth Line in **2019** with two stations in the City at Farringdon and Liverpool Street/Moorgate. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City.
- 6.2.2. Traffic in the City has changed significantly over the last two decades, both in terms of total volume and overall composition. Biennial traffic counts across the City show a 40% decrease in overall traffic volumes, with greater reductions for motor vehicles such as cars and light goods vehicles. The greatest observed reductions in numbers have coincided with key events such as the introduction of the Congestion Charge Zone, the global recession and the introduction of cycle superhighways. The street capacity unlocked by these reductions, alongside increases in cycling infrastructure provision, has facilitated an estimated tripling of cycling volumes across the City.
- 6.2.3. Despite **this traffic** reduction, there are still significant challenges. **The most recent** ~~T~~traffic counts in autumn 2017 found a slight increase in car volumes, probably caused by the increasing volumes of private hire vehicles. Freight **volumes-vehicle numbers**, after dropping significantly between 1999 and 2004, have levelled off in recent years. The rapid increase in cycling volumes seen in the first decade of the 21st century has not been sustained, with volumes slightly decreasing in recent years.
- 6.2.4. The demands on the City's transport network are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation ~~is developing~~ **has published** a long-term Transport Strategy which ~~will sets~~ the key priorities for the City's streets and how the network is used. **The Transport Strategy was developed in parallel with the drafting of the Local Plan and the policies set out in this document align with the policies and priorities in the Transport Strategy.**
- 6.2.5. The Mayor's Transport Strategy provides London-wide guidance, which is implemented locally through the City's Local Implementation Plan. Transport providers serving the City also publish plans and strategies that influence investment and management decisions affecting the City's transport network.

Strategic Policy S9: Vehicular Transport and Servicing

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

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity, including the Northern Line/Bank Station upgrade. **Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused.**
2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail, **and** London Underground stations **and river piers.**
4. Minimising road danger and congestion, and reducing vehicle emissions by:
 - Designing and managing streets in accordance with the City of London street hierarchy;
 - Minimising the impact of freight and servicing trips through measures including the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, **and** the use of freight consolidation **and promoting deliveries by foot or bicycle for shorter distances;**
 - Facilitating essential traffic, including buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
 - Encouraging the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
 - Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
 - Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, **Cycling Promotion Plans** and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised **as a result of their development,** including through the use of river transport.

Reason for the policy

- 6.2.6. The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. **Ninety-three percent of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work.** In transport terms, the City is already a highly sustainable location, and the opening of the Elizabeth Line will result in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London. to help secure

120

improvements to public transport, for instance by safeguarding land from other forms of development where necessary.

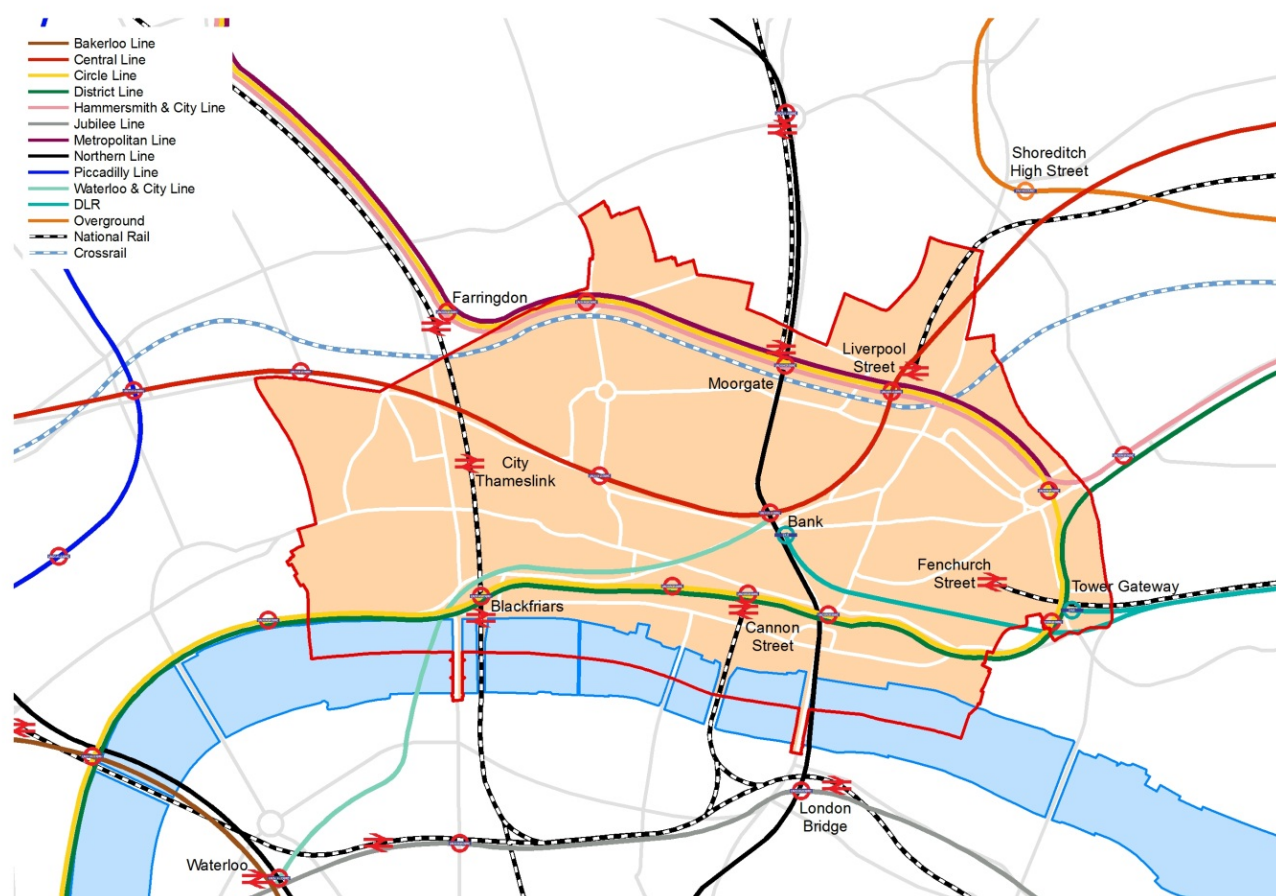


Figure 11: Rail and underground network

Current category	Movement function	Proposed category
Strategic Road	Through traffic – the preferred streets for motor vehicles that do not start or finish their journey in, or immediately adjacent to, the Square Mile.	London Access <u>streets</u> (TfL network)
London Distributor Road		
Borough Distributor Road	Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access <u>streets</u>
Local Distributor Road		

Local Access Road	Access – used for the first or final part of a journey, providing access to properties.	Local Access <u>streets</u>
--------------------------	---	------------------------------------

Table 1: Proposed City of London street hierarchy

6.2.7. The City's **draft** Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. **A simplified street hierarchy is proposed, as set out in Table 1**

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

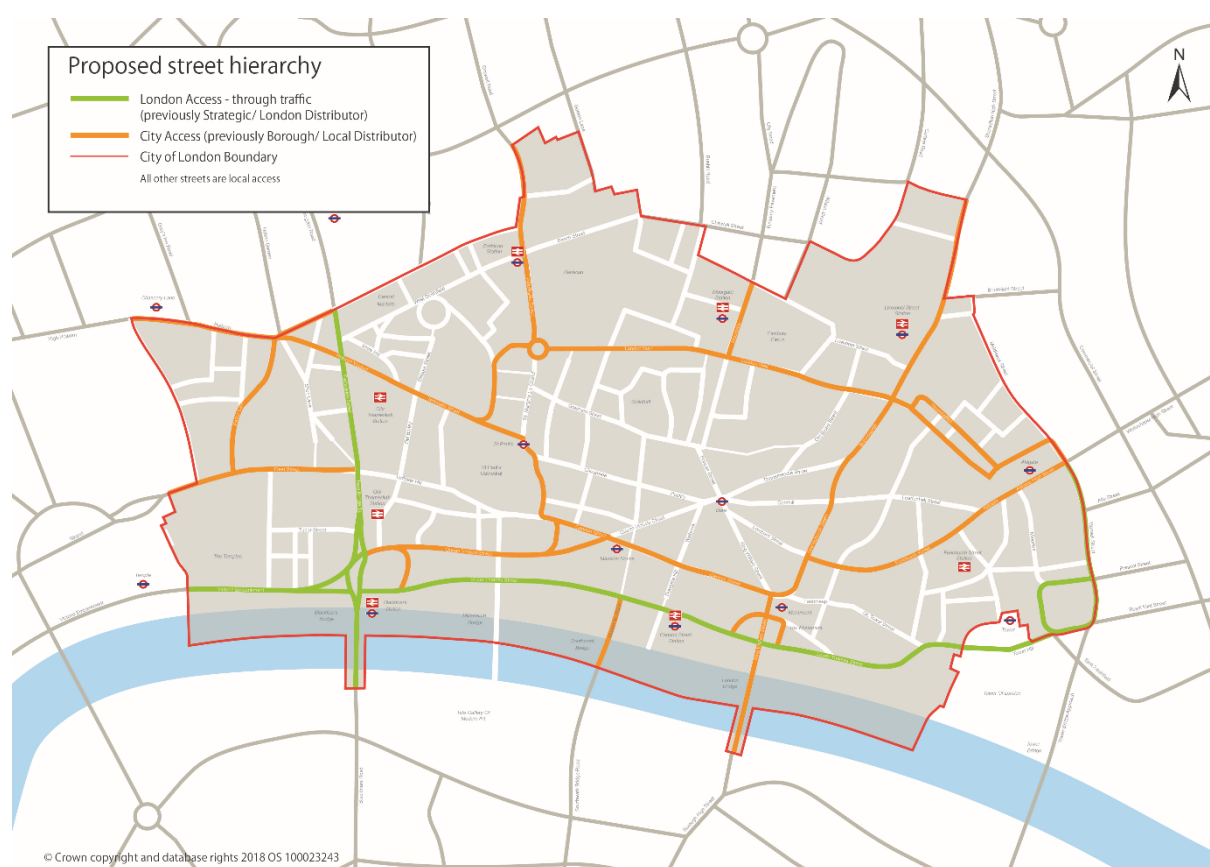


Figure 12: Proposed City of London Street Hierarchy

How the policy works

6.2.9. The City's **draft** Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City's streets, with targets proposed to reduce the number of motor vehicles in the City by **at least** 25% by 2030 and **at least** 50% by 2044. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.

- 6.2.10. Achievement of the targets ~~will be partly~~ is dependent on measures introduced by the Mayor of London and TfL, such as the ~~proposed~~ Central London Zero Emission Zone, although the City Corporation will ~~consider~~ explore implementing such specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.
- 6.2.11. The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 6.2.12. The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
- 6.2.13. The City Corporation will require developers and occupiers to implement proposals to minimise the impact of freight and servicing trips through supporting measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.
- 6.2.14. Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City's streets.

Policy VT1: The impacts of development on transport

1. Development proposals must have a positive impact on highway safety for all users and not have adverse effects on the City's transport networks. Where development would result in adverse impacts on the transport network, these must be mitigated through site/building design and management of operational activities. Appropriate measures will be sought via planning contributions or by legal agreement.
2. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
3. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) are required for all developments that exceed the following thresholds:

Land Use	Thresholds
Offices	1,000m ²
Residential	10 units
Retail	1,000m ²
Hotel	10 bed spaces
Health	1,000m ²

Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m2

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

Reason for the policy

- 6.2.15. Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.

How the policy works

- 6.2.16. An assessment of the transport implications of development, during both construction and operation, should address the impacts on:

- Road danger;
- Pedestrian environment and movement;
- Cycling infrastructure provision;
- Public transport; and
- The street network.

- 6.2.17. Transport Assessments and Travel Plans **(incorporating Cycling Promotion Plans)** should be used to demonstrate adherence to the City Corporation's Transport Standards. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. **TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website.**

- 6.2.18. **A full Construction Logistics Plan (CLP) will be required through conditions of a planning approval with outline details provided at the application stage. A CLP Construction Logistics Plan** should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites **and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs).**

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

Policy VT2: Freight and Servicing

1. Applicants are required to consult with the City Corporation and agree all matters relating to servicing at an early design concept stage. Development should be designed to allow for on-site servicing, **wherever practicable**.
2. Developments must minimise the need for freight trips and seek to **work together with adjoining owners and occupiers to** manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation. New technologies will be encouraged to enable efficient servicing and deliveries to sites.
3. On site servicing areas must be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. **Servicing areas must be equipped with electric vehicle fast charging points.**
4. Delivery to and servicing of **new** development must take place outside peak hours (i.e. avoiding deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries should be made in the late evening or at weekends outside of residential areas. ~~**Justification will be required where deliveries within peak hours are considered necessary.**~~ Areas of high footfall may be subject to further restrictions.
5. Developers should consider ways to reduce congestion caused by servicing and deliveries, such as implementing last mile deliveries by foot, cycle or zero emission vehicle, and should justify where such measures are not possible. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.
6. Provision should be made within buildings for shredding operations.

Reason for the policy

- 6.2.20. The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. **The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.** The City Corporation is working with local employers to support them in freight consolidation and to share best practice and ideas, for example through the Cheapside Business Alliance and the Active City Network.
- 6.2.21. Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles.

The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of different forms of consolidation, including 'virtual' as well as physical consolidation, will be required to minimise the number of trips required to service a development during construction and operation. Virtual consolidation involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building. **Opportunities to trial and support freight innovation through new technology will be explored as part of the City Corporation's Future City Streets programme.**

6.2.22. Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's draft Transport Strategy **outlines the Corporation's intention to work with a partner haulier to provide a consolidation service for the City of London by 2022 and aims** to establish a sustainable logistics centre to serve the Square Mile by 2030. This centre would co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriering services. It would be supported by last mile logistics hubs within the City to facilitate more deliveries on foot, by bike and by small electric vehicles.

6.2.23. Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. **Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles.** To reduce emissions from delivery vehicles, electric vehicle charging points will be required within service areas for freight vehicles.

6.2.24. On-street shredding operations associated with building occupation creates noise and congestion on street and can have an adverse impact on the amenity of neighbouring uses. **Provision should be made within off-street servicing areas for shredding operations.**

How the policy works

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

6.2.26. **Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m² and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements.** Where consolidation of servicing and deliveries is proposed, the number of vehicle trips

that have been avoided as a result should be set out in the **Delivery and Servicing Plan (DSP)**. Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP. Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements **and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries.** The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. **The City Corporation will work with developers and occupiers to monitor the actual reductions in deliveries achieved through consolidation.**

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

Policy VT3: Vehicle Parking

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised as sites for last mile delivery hubs and other alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported only if it is demonstrated that they are no longer needed for a transport-related function.

4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as **near** stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

Reason for the policy

- 6.2.31. The City has excellent public transport accessibility and all development should therefore be car-free, unless it can be demonstrated that there are exceptional circumstances which justify limited car parking.

How the policy works

- 6.2.32. Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use. **Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. Any such parking should be marked out as such and restricted only for these users.**
- 6.2.33. The City's public car parks were mostly constructed during the 1960s. Some are now underused and **may provide an opportunity for the provision of the City Corporation is actively developing proposals to establish** last mile delivery hubs **within those car parks.** ~~or~~ **Other transport-related infrastructure may be suitable in under-utilised car parks.**
- 6.2.34. Evidence will be required to demonstrate that a car park is no longer required for a transport-related purpose if conversion or redevelopment to an alternative land use is proposed.

Policy VT4: River Transport

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore and other river-based transport infrastructure **to enable an increase in passenger and freight transport by river.** The City Corporation will seek the reinstatement of Swan Lane Pier and development which prejudices this reinstatement will not be permitted.
2. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site.
3. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.

Reason for the policy

- 6.2.35. Walbrook Wharf is the only active river wharf in the City and will be retained as a waste facility and river wharf in line with the London Plan and the Mayor's Safeguarded Wharves Direction. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site, there may be potential to use Walbrook Wharf for freight logistics.
- 6.2.36. Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.
- 6.2.37. Swan Lane ~~p~~Pier is a redundant pier and the City Corporation will seek its reinstatement. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.
- 6.2.38. The City Corporation will require developments adjacent to, on, or over the river, to consider the use of the river for freight and servicing and for the transport of construction and waste materials.

Policy VT5: Aviation Landing Facilities

1. Heliports will not be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.
2. **Landing facilities for drones will not be permitted.**

Reason for the policy

- 6.2.39. Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's **draft** Transport Strategy sets out principles that will apply to the potential use of drones in the City. **Landing facilities for drones will not be permitted, but the City Corporation will keep the need for such facilities under review, taking account of developing technology, the impact on City streets and sky space and security and privacy implications.**

6.3. Walking, Cycling and Healthy Streets

Context

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



Figure 13: Mayor's Transport Strategy – Indicators of Healthy Streets Indicators (Source: Lucy Saunders)

6.3.2. ~~The demands on the City's streets are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation is developing a long-term Transport Strategy which will set priorities for how streets are used. The Healthy~~

Streets Approach provides the framework for the City's Transport Strategy.

The City's workforce is expected to increase significantly over the course of the Plan period to 2036, while visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early evening. Figure 14 illustrates forecast pedestrian flows across the City in 2026 during the am peak.

2026 Baseline scenario Morning peak (07:00 – 10:00)

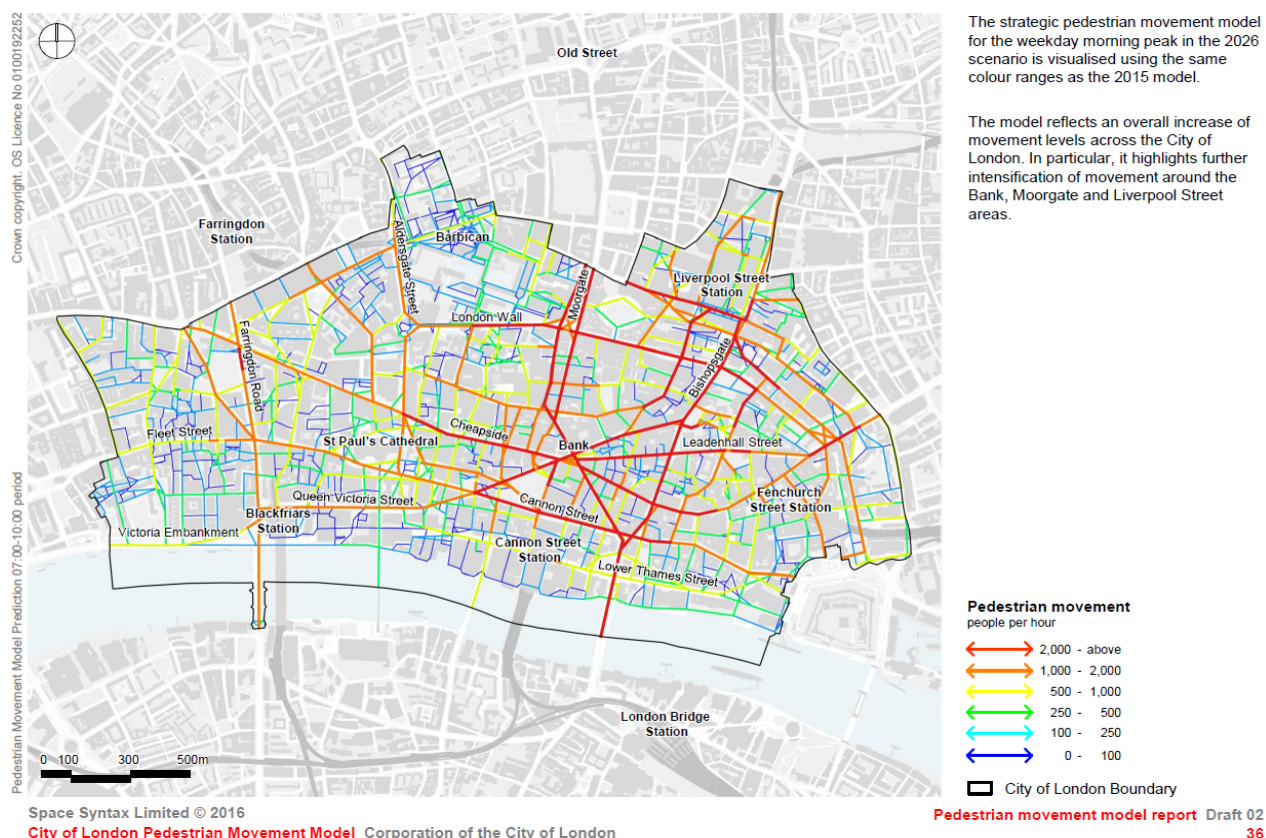


Figure 14: Forecast pedestrian flows in the City of London in the am peak in 2026

Strategic Policy S10: Walking, Cycling and Healthy Streets

The City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces to prioritise walking and cycling, improve accessibility and encourage more active modes of travel to, from and within the City by:

- Improving conditions for safe, convenient, comfortable and accessible walking and cycling, incorporating climate change adaptation;
- Expanding the cycle network across the City with the aim of ensuring that **nearly** all property entrances are within 250m of the network;
- Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;
- Improving access routes and the public realm around stations, and between stations and key destinations; and

- Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of people with disabilities;

Reason for the policy

6.3.3. Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, **with over 750,000 walked journeys a day**. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost 300% between 1999 and 2017, although the rate of growth has slowed markedly since 2012. **People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during peak periods.**

Pedestrian numbers have also risen in recent years as the City's workforce has grown. Over 400,000 pedestrians were counted on the City's streets during a survey in November 2017.

6.3.4. Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles.

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

How the policy works

6.3.6. Through the City **Corporation**'s **draft** Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling and walking, enhance the public realm and create new public space.

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

6.3.8. The first **three four** Healthy Streets Plans, to be developed by 2022, will cover the following areas:

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum of London. The area covered will align with the Smithfield and Barbican Key Area of Change.
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting the delivery of the proposed new Centre for Music and associated changes to the Museum of London roundabout and St Paul's Gyratory.
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Cluster Key Area of Change and incorporate part of the Aldgate **and Tower** Key Area of Change.
- **Temple and Fleet Street: in response to the Fleet Street Estate Project, which comprises the new Magistrates court and City of London Police headquarters, and enhancement of Fleet Street and the Temples area.**

6.3.9. An experimental safety scheme was introduced at Bank Junction in May 2017, which restricted traffic to buses and cycles only on weekdays between 7am and 7pm. Monitoring shows that this scheme achieved a significant reduction in casualties at the junction, while also reducing NO₂ emissions in the area. Traffic restrictions at the junction have now been made permanent and a wider series of highways and public realm enhancements, known as All Change at Bank, will be implemented during the Plan period to transform the look and feel of this key junction at the heart of the City.

6.3.10. Adaptation to the anticipated climate change in the City should include pollution reduction and mitigation. The **Mayor's** Healthy Streets Approach, **and** the City's **draft** Transport Strategy **and the City Corporation's Air Quality Strategy** seek to deliver improvements in air quality and reductions in emissions and noise from transport. The City Corporation is working with partners to ensure that the City's streets and the public transport system are resilient to the long-term impacts of severe weather and climate change.

Policy W1: Pedestrian Movement

1. Developers should facilitate pedestrian movement **and reduce severance** by provision of suitable routes through and around new developments. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall.
2. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians using them.
3. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
 - The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;

- The shortest practicable routes between relevant points.
4. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
 5. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable. **~~unless exceptional circumstances can be demonstrated.~~**
 6. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.
 7. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.

Reason for this policy

- 6.3.11. In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes. **Policy D4 sets out requirements for improved pedestrian permeability through buildings and development sites.**
- 6.3.12. The City Corporation's **draft** Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, **increasing the number of pedestrianised or pedestrian priority streets to 35km by 2030 and** with an initial focus on the City Cluster and Culture Mile. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 6.3.13. The **draft** Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 15):
 - The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank Junction.
 - Bank Junction and streets between the junction and the City Cluster.
 - The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory.

- The route between the Barbican and the new Museum of London, including Beech Street and Long Lane (the 'Culture Spine').
- Fleet Street, including **potential changes to** Ludgate Circus (in partnership with TfL).
- The Bishopsgate corridor, including Monument junction (**in partnership with** TfL)
- The Globe View section of the Riverside Walkway.



Figure 15: Key Proposed walking routes to be delivered by improvements 2019-2030

6.3.14. The City's narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, way-finding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City's users.

How the policy works

6.3.15. In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.

6.3.16. Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. TfL's Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City Corporation's ~~draft~~ Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

6.3.17. **Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition.**

6.3.18. Where new pedestrian routes are created, or existing routes improved, the City Corporation will work with organisations such as the Active City Network and the Cheapside Business Alliance to provide information about routes to City workers, residents and visitors.

Policy W2: Active Travel including Cycling

All major development **and refurbishments** must promote and encourage active travel through making appropriate provision for ~~pedestrians and cyclists~~ **people who walk, cycle and travel actively**, by:

- ensuring suitable access between the development site and pedestrian and cycle routes;
- incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling.

Reason for this policy

6.3.19. Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.

6.3.20. A growing number of people are choosing to cycle through and around the Square Mile. Increased access to the East-West and North-South Cycle Superhighways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 16). Cycling improvements and interventions will be prioritised on this network, with the aim of delivering ~~key parts of~~ the core cycling network by ~~2030~~ **2035**.

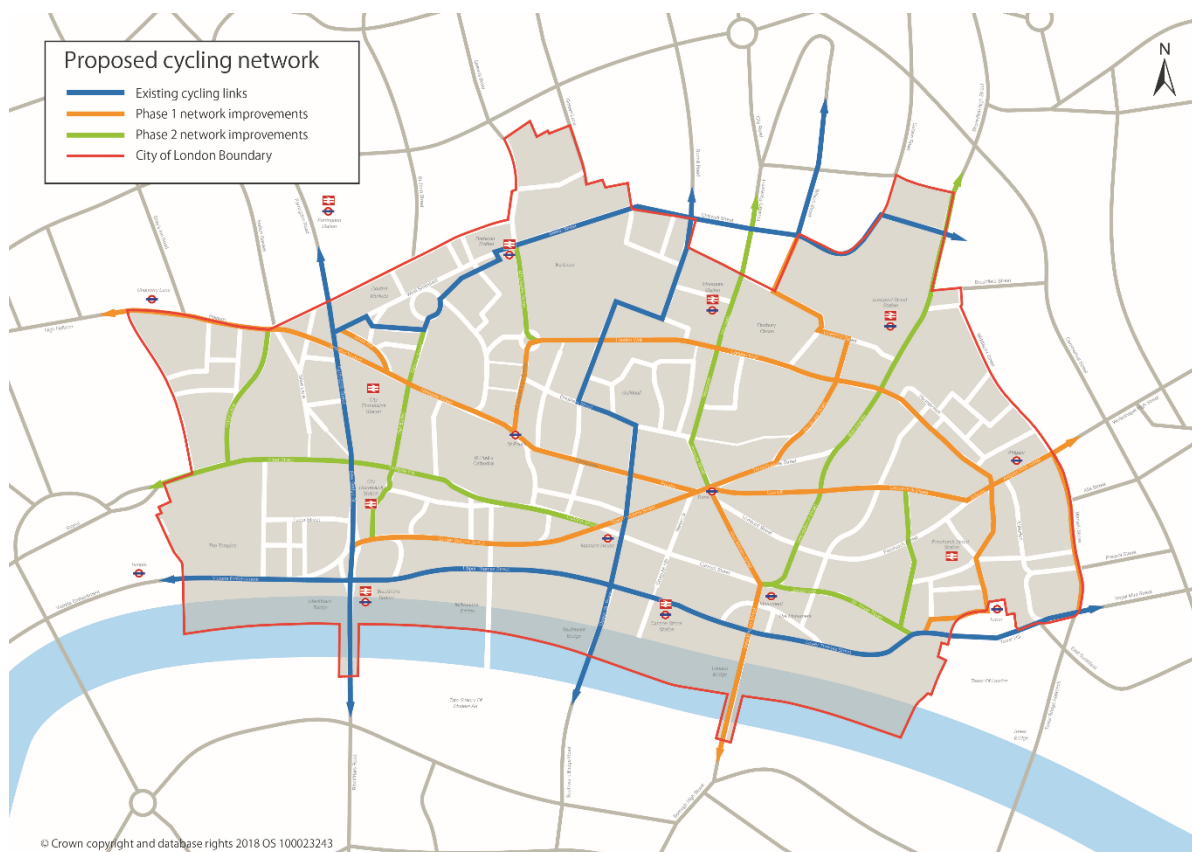


Figure 16: Proposed core cycling network and phasing

6.3.21. Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans and a review of existing Quietways, which run along less heavily trafficked back streets. Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London's Transport Strategy, and that of the Mayor of London.

How the policy works

6.3.22. New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. **Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces.** The City of London's Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this.

6.3.23. Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City's cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

Policy W3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
2. All **long stay** on site cycle parking must be secure, undercover and preferably enclosed, **in accordance with the London Cycle Design Standards**.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.

Reason for this policy

- 6.3.24. There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, **reduce carbon emissions** and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

How the policy works

- 6.3.25. Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. A robust justification for failure to comply with London Plan standards will be required. This will be considered on a case by case basis as part of pre-application discussions. **All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.**
- 6.3.26. Short-stay visitor cycle parking should be provided on-site ~~alongside long-stay employee parking at ground floor level.~~ **Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible.** If this is not possible because of the layout and configuration of the site, **25% additional long stay cycle parking must be provided.** ~~then on-street cycle parking nearby will be encouraged providing this does not obstruct pedestrian movement.~~
- 6.3.27. In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.
- 6.3.28. The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.
- 6.3.29. This policy applies to the cycle parking provided within new developments. The City Corporation's ~~draft~~ Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. **The City Corporation will publish a A Cycle Parking Delivery Plan** ~~will be published by 2020~~, which will review the

availability and distribution of public cycle parking on and off-street to ensure it is sufficient to meet forecast demand.

6.4. Historic Environment

Context

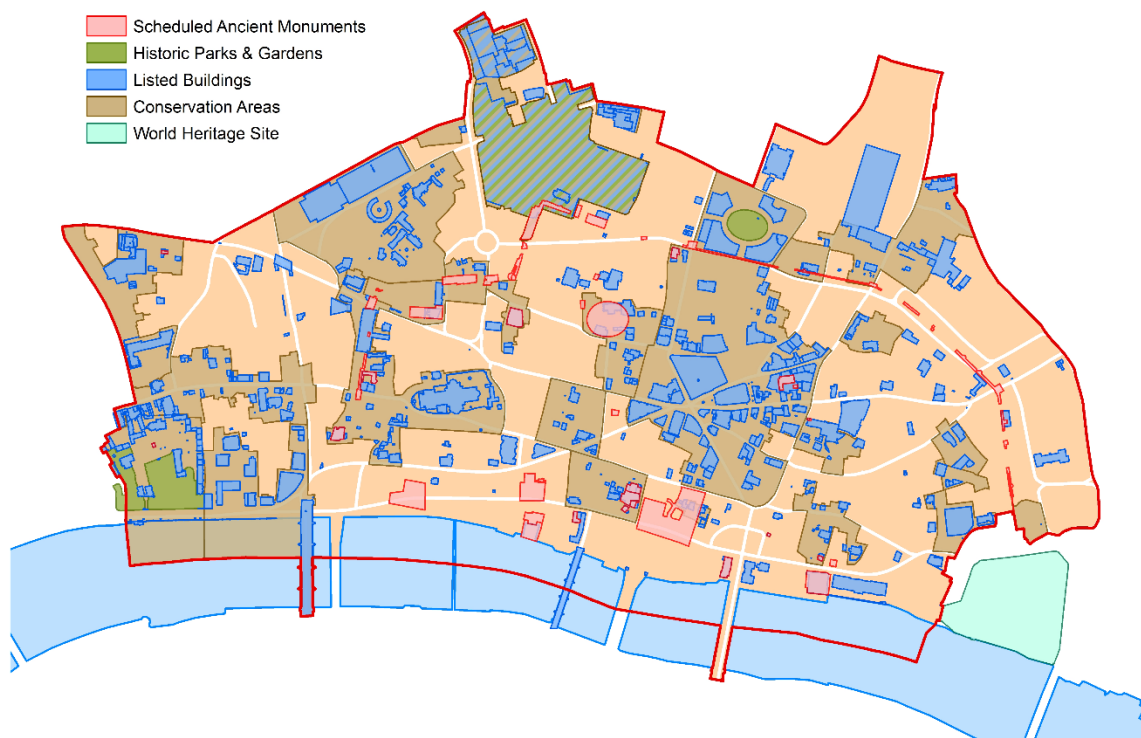
6.4.1. The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.

6.4.2. There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17th century home on Cloth Fair to Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 Scheduled **Ancient** Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides **an immediate part of the** backdrop for the Tower of London World Heritage Site.

Strategic Policy S11: Historic Environment

The City's heritage assets, their significance and settings will be positively managed, by:

1. Conserving and enhancing heritage assets **and their settings** to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing;
2. Encouraging the beneficial, continued use of heritage assets consistent with their conservation and enhancement, **including those on the Heritage at Risk Register**;
3. Seeking improved public access, and enhanced **experience and** interpretation of the City's **cultural and** heritage **assets**;
4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations;
5. Preserving and seeking to enhance the Outstanding Universal Value (**OUV**), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.



Figure

17: Designated heritage assets in the City of London

Reason for the policy

6.4.3. The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.

6.4.4. The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.

6.4.5. The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space. The City also has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, **Bevis Marks Synagogue** and an equally unique collection of over 60 churchyards embedded within a dense townscape.

6.4.6. Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as

creative industries. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to, **and experience of,** the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

How the policy works

6.4.7. The policy **allows for enables** adaptations to be made to heritage assets where the alterations are consistent with the conservation and significance of those assets. The sensitive adaptation of heritage assets contributes to the continual growth of the City's economy. This and continued investment will ensure that buildings retain an active use so that the City's buildings and heritage can be appreciated by present and future generations.

6.4.8. **The City Corporation will encourage proposals to achieve the conservation and appropriate use of buildings and monuments on the Heritage at Risk Register to ensure their repair, long term well-being and where possible, avoid future deterioration.**

6.4.9. In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage ~~s~~**Site of o**~~U~~**Outstanding u**~~U~~**niversal v**~~U~~**Value (OUV).**

Policy HE1: Managing Change to Heritage Assets

Development proposals which affect heritage assets or their settings should be supported by a Heritage Assessment, to evaluate the significance of relevant heritage assets **and their settings,** to inform the proposals and maximise enhancements.

Proposals should meet the following criteria:

1. Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings.
2. Development in conservation areas should **conserve preserve and or** enhance the character or appearance of the conservation area. The **removal of features loss of buildings and elements** which contribute to the character, appearance or significance of a conservation area will be resisted;
3. Development should not adversely affect Historic Parks and Gardens that are included on the Historic England Register **and historic open spaces;**
4. The demolition or **removal loss** of designated heritage assets will be resisted.
5. **Where proposals would result in harm to, or the loss of, a non-designated heritage asset, the City Corporation will have regard to the scale of any harm or loss, the significance of the heritage asset and the wider public benefits proposed.**
6. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought.

Reason for the policy

- 6.4.10. It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.
- 6.4.11. **National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**
- 6.4.12. **Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear understanding of a building, structure, open space or archaeological remains, including group value.**
- 6.4.13. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.
- 6.4.14. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 6.4.15. Many buildings in conservation areas, **whilst not being listed**, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.
- 6.4.16. Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature

of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.

- 6.4.17. Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building **is minimised does not harm its significance**. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.
- 6.4.18. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations is a material consideration.
- 6.4.19. Development proposals that affect the City's historic parks and gardens will be assessed to ensure that overshadowing does not cause undue harm, that their historic character is maintained, and that the setting, enjoyment, and views into and from these gardens are respected. Development should not detract from the layout, design, character, appearance or setting of the park or garden or prejudice its future restoration.
- 6.4.20. The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have historically been lost to the detriment of the City's historic townscape. Where possible, **via development** the City **Corporation** will seek to re-open or reintroduce such routes **when the opportunity arises**.

How the policy works

- 6.4.21. Developers will be required to provide supporting information describing the significance of any heritage assets whose fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets.

Policy HE2: Ancient Monuments and Archaeology

1. Development proposals which involve excavation or ground works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.

2. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, access to, public display and interpretation where appropriate.
3. Proper investigation and recording of archaeological remains will be required as an integral part of a development programme, together with timely publication and archiving of results to advance understanding.

Reason for the policy

- 6.4.22. The entire City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.

How the policy works

- 6.4.23. Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and inform consideration of the development proposals by the City Corporation.
- 6.4.24. In some cases, a development may reveal a monument or archaeological remains which will be displayed on the site, or reburied. On sites where significant monuments or archaeological remains exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future. Undesignated archaeological remains equivalent to a scheduled monument will be given equal weight to designated heritage assets.
- 6.4.25. The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of the development proposals. Agreement will be sought, where appropriate, to achieve public access. The City Corporation will refuse schemes which do not provide an adequate assessment of a site, make any provision for the incorporation, safeguarding or preservation of significant monuments or remains, or which would harm or adversely affect those monuments or remains. Where display of a monument or archaeological remains would harm the heritage asset or make it vulnerable and reburial is necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.
- 6.4.26. A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be controlled using conditions and will ensure the preservation of those remains by record. The programme of

archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

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

1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and connectivity.

Reason for the policy

6.4.27. The Tower of London is a UNESCO World Heritage Site of Outstanding Universal Value (**OUV**). While the Tower itself is within the London Borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to accessibility for non-motorised road users. Developments within a wider area may also affect the setting of the Tower, depending on their scale, form and location.

How the policy works

6.4.28. Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.

6.4.29. The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its **heritage OUV**, while accommodating change. **The International Council on Monuments and Sites (ICOMOS) publication 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' offers guidance on the process of commissioning Heritage Impact Assessments (HIAs) for World Heritage properties, in order to evaluate the impact of potential development on the OUV of properties.**

6.5. Tall Buildings and Protected Views

Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD) in height.
2. Tall buildings of world class architecture and sustainable and accessible design will be permitted on suitable sites, having regard to:
 - the potential effect on the City skyline, the wider London skyline and historic skyline features;
 - the character and amenity of their surroundings, including the relationship with existing tall buildings;
 - the **impact on the** significance of heritage assets and their settings;
 - the provision of a high-quality public realm at street level; and
 - the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.
3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.
4. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities **within the building and its curtilage, including** at upper levels, available at no charge.
5. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.
6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; **the protected vista of the Tower of London including its background;** and Monument views and setting, all as defined on the Policies Map.

Reason for the policy

- 6.5.1. The City contains many tall buildings, which help to enhance its environment and economy and contribute to London's world city role. While tall buildings are a characteristic and iconic element of the City's skyline, they must not adversely impact on the City's unique environment or built heritage. **All of the City is sensitive to the development of tall buildings and** areas outside of the City may

also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered.

Policy HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site.

6.5.2. Tall buildings are defined as those exceeding 75m AOD in height. Figure 18 shows their current distribution ~~of buildings exceeding 75m AOD in height in the City~~. The City Corporation is required to refer applications to the Mayor for buildings that exceed 150m above ground height across the City and 25m above ground height in the Thames Policy Area. The intention of this lower threshold is to preserve the open aspect of the river and the riverside public realm.

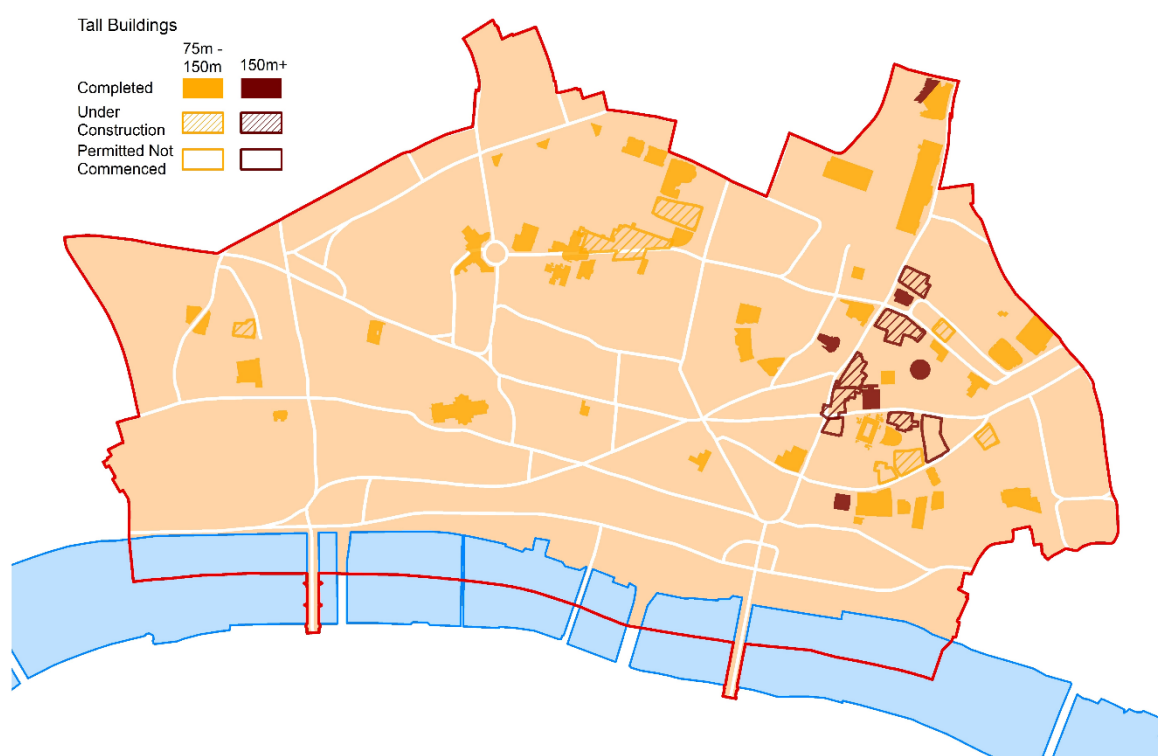


Figure 18: Tall buildings distribution in the City of London March 2018 – NEED TO UPDATE TO 2019 BASE

6.5.3. Guidance issued by the Design Council/CABE and Historic England encourages local planning authorities to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate. The **draft** London Plan indicates that areas should be identified where new tall buildings will be an appropriate form of development in principle.

6.5.4. All of the City of London is sensitive to development of tall buildings., **but** ~~o~~**Outside** of the City Cluster, there is **limited less** scope for new tall buildings due principally to conservation area and views protection considerations. Figure 19 identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies. **Tall building development in those parts of the City outside of the inappropriate areas will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan.**

6.5.5. The City Cluster represents the most appropriate area for tall buildings in the City, but this does not mean that **every all sites** within the cluster **is are** suitable. Any new tall building proposal must meet the criteria set out in the policy **to enhance the City's skyline, while** minimising the impact on the surrounding area. Policy **S20 S21** provides more details about the considerations that apply to new tall building proposals in **that area the City Cluster**.

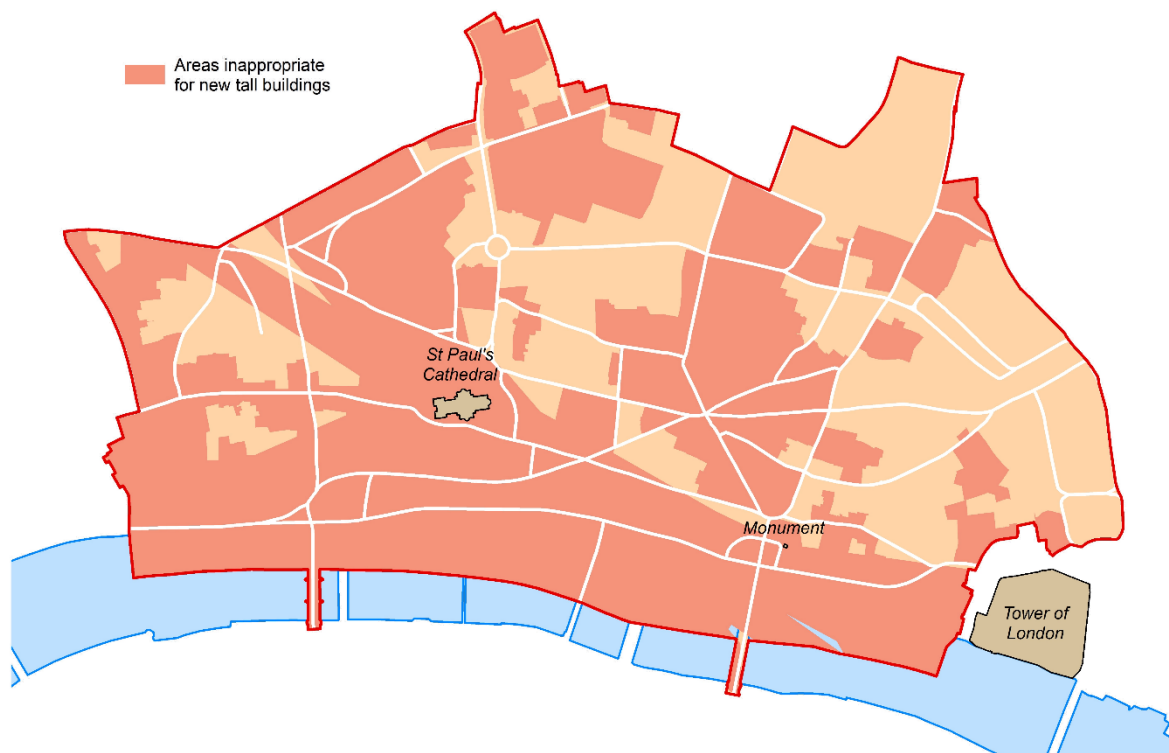


Figure 19: Areas inappropriate for new tall buildings – UPDATE TO SHOW BACKGROUND TO TOWER OF LONDON AS INAPPROPRIATE FOR TALL BUILDINGS

How the policy works

6.5.6. Tall buildings are high-profile developments, visible on the skyline across large parts of London. They **represent the City's built environment to a wide audience provide City landmarks** and should be designed to enhance the City's skyline.

6.5.7. Tall building proposals must not adversely impact on the operation of London's airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority's (CAA's) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA, **Heathrow and London City Airports** regarding

building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.

- 6.5.8. The development of tall buildings must take account of City Corporation Planning Advice Notes on the potential microclimate **and thermal comfort** impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar convergence, sunlight, **and** wind **and thermal comfort** explaining how they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.
- 6.5.9. Proposals for new tall buildings should take account of the cumulative impact of the proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.
- 6.5.10. Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. Tall buildings should contain permeable ground floors which provide an active frontage, such as retail facilities. **Tall buildings should provide free to enter, publicly accessible areas, which may include At upper levels, accessible public space which is available at no charge should be provided. This may comprise features such as** retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries. **There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London.**
- 6.5.11. **The City Corporation will use 3D modelling technology to provide a visual assessment of the impact of tall buildings on the local, City-wide and London-wide townscape and skyline. This assessment will support detailed consideration of development proposals against the policies in this Plan. Developers should submit virtual models of their development in a format compatible with the City Corporation's 3D model to enable this assessment.**

Strategic Policy S13: Protected Views

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
- Protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from Fleet Street **and Ludgate Hill**; the setting and backdrop to the Cathedral;

significant local views of and from the Monument and views of historic City landmarks and skyline features.

- Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).

Reason for the policy

6.5.12. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.

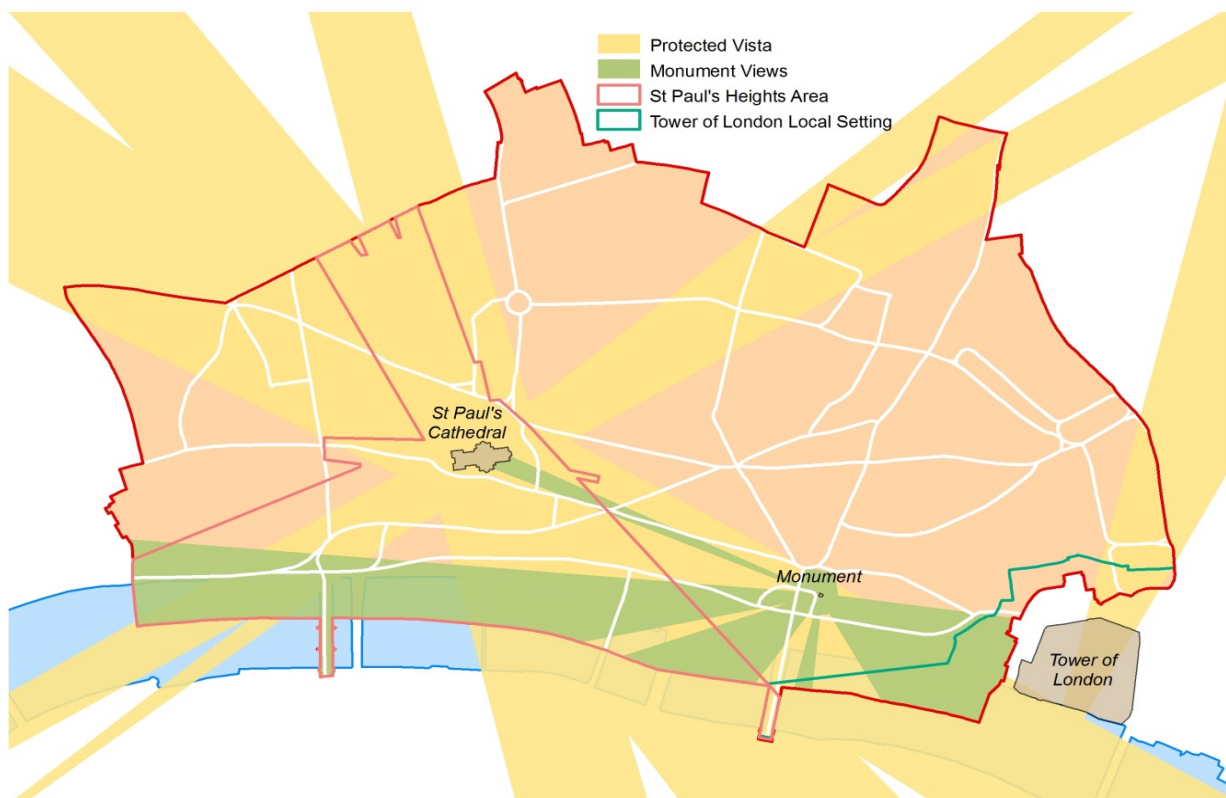


Figure 20: Areas covered by protected views AMEND TO SHOW LINE OF FLEET STREET VIEW PROTECTION – PROBABLY USING A DOTTED LINE ALONG THE CENTRE OF THE FLEET STREET VIEW CONE: TOL BACKGROUND AREA NEEDS TO BE WIDENED TO ACCORD WITH LVMF

How the policy works

6.5.13. Protected Vistas are defined geometrically from an assessment point at the view location to the Strategically Important Landmark that is the focus of the protected vista. Each Protected Vista includes a Landmark Viewing Corridor, within which development should not exceed the height of the threshold plane. Beside and

behind Landmark Viewing Corridor are the Wider Setting Consultation Areas, within which development that exceeds the threshold plane should not compromise the viewer's ability to recognise and appreciate the Strategically Important Landmark.

- 6.5.14. Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.
- 6.5.15. The LVMF defines a Protected Vista for the Tower of London. Any development in the Wider Setting Consultation Area in the background of this Protected Vista should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, ~~it is likely that~~ proposed new development in the City which exceeds the **defined LVMF** threshold plane will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.
- 6.5.16. The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.
- 6.5.17. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street **and Ludgate Hill** which forms part of the processional route between Westminster and the City. The views of St Paul's change along the length of **Fleet Street this route**, depending on the topography and alignment of buildings. Development proposals visible from agreed assessment points should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the **dome, silhouette** of St Paul's Cathedral, and that they maintain the current clear sky background profile **of the dome. An indicative background view centre line is shown on Figure 20 to highlight this issue.** Further details will be set out in an update to the Protected Views SPD **and Statement of Significance to inform the future conservation and enhancement of this approach.**
- 6.5.18. New development proposals should **form attractive features be well designed** in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE, **and** Historic England **and the Greater London Authority.**

6.5.19. The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.

6.5.20. **The City Corporation will supplement its assessment of strategic and locally protected views with a visual assessment carried out using 3D modelling technology. Developers should submit virtual models for all major development in a form compatible with the City Corporation's 3D model.**

6.6. Open Spaces and Green Infrastructure

Context

6.6.1. The City of London is a busy urban environment containing many small open spaces and pocket parks. These spaces are vital to ~~the success of~~ the City, offering residents, workers and visitors outside spaces in which to work or to relax and appreciate the streetscape. There is a growing recognition that green infrastructure ~~also~~ helps to mitigate against some effects of climate change, provides benefits for well-being and mental health and improves air quality. These same small green spaces are essential for wildlife found in this urban setting. The policy seeks to provide further green infrastructure, open space provision and biodiversity within the City.

Strategic Policy S14: Open Spaces and Green Infrastructure

The City Corporation will work in partnership with developers, landowners and other agencies to promote a greener City by:

- Protecting existing open and green space;
- Seeking the provision of new open **and green** space through development, public realm or transportation improvements;
- Increasing public access to existing and new open spaces;
- Creating, maintaining and encouraging high quality green infrastructure;
- Using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
- Promoting the greening of the City through new development opportunities and refurbishments;
- Ensuring new development and refurbishment protect and enhance the City's biodiversity.

Reason for the policy

6.6.2. The City is densely built up and most of its open space provision consists of small spaces at street level. Green infrastructure in the City includes civic spaces, parks and gardens, ~~cemeteries and~~ churchyards, **burial grounds** and green roofs and walls in addition to amenity spaces. A key environmental asset is the River Thames.

6.6.3. Open and green space is under increasing pressure due to the intensification of development, an expanding workforce and growing visitor numbers projected over the ~~next twenty years~~ **Plan period**.

6.6.4. The City of London Corporation is committed to protecting existing open spaces and expanding the provision of green infrastructure as far as possible consistent with heritage significance. The City Corporation wishes to see further urban greening to make the Square Mile more attractive to workers, residents and

visitors. This would contribute to the Mayor of London's ambition to make over 50 per cent of London green by 2050 **and support London's designation in 2019 as the world's first National Park City.**

6.6.5. Given that space is at a premium in the City, all new developments and refurbishments will be required to include a greening element to the building and/or the public realm where consistent with good design **and area character**. This approach will have many benefits over time such as improving the urban environment for biodiversity, reducing rainwater run-off, reducing air and noise pollution, regulating temperature, and making the City a more desirable business location by improving visual amenity. Public access to greening elements should be achieved wherever possible.

How the policy works

6.6.6. The City of London Corporation will work with developers and landowners at all stages of the development process and actively monitor developments from pre-application stage through to post completion to ensure that the highest standards of green infrastructure are achieved, and existing provision is improved.

Open Spaces

Policy OS1: Protection and provision of open spaces

The quantity, quality and accessibility of public open space will be maintained and improved.

- Existing open space will be protected, particularly **that spaces** of historic interest.
- Where a loss of existing open space is proposed, it **will must** be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site;
- Additional publicly accessible open space and pedestrian routes will be sought in major commercial and residential developments wherever practical but particularly in areas of open space deficiency and where pedestrian modelling shows significant pressure on City streets;
- Further **civic public** spaces will be created from underused highways and other land;
- Public access will be secured, wherever possible, to existing and proposed private spaces;
- Access to new and existing open spaces will be improved;
- Open spaces must be designed to meet the needs of all the City's communities.

Reason for the policy

6.6.7. The City of London has **376** open spaces totalling **just under 34** hectares which includes parks, gardens, churchyards and hard open spaces such as plazas and

improvements to the highway. Most of the open spaces are small, with approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquillity, agile working, leisure and sport, and to increase biodiversity.

How the policy works

6.6.8. Many open spaces in the City are of historic value, such as churchyards, while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. **Policy D3 sets out standards for public realm improvements.** These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs.

6.6.9. The provision of open space across the City is uneven. The northern area of the City contains just over half of all the open space in the City, due to the relatively large amounts of space in the Barbican and Golden Lane estates and the Broadgate commercial estate. There is significant open space along the Thames and the riverside, with the Riverside Walk, the Temples legal precinct and space close to the Tower of London. A new public open space will be created at Blackfriars foreshore as a result of the Thames Tideway Tunnel project. Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area and the City Cluster areas have the lowest **percentages proportions** of open space and face pressure from the increasing employment and pedestrian flow numbers associated with commercial intensification (see Figure 14). **Additional open space is especially important in these areas, both at street level and at higher levels through the provision of accessible roof gardens/terraces.**

6.6.10. There is intense pressure on all the City's open spaces particularly at lunchtimes and new development provides ~~an opportunity~~ **opportunities** to create additional open space in and around buildings. These spaces should be designed for multiple uses, be maintained ~~in a cleanly condition and~~ to a high standard and be resilient to future climate conditions.

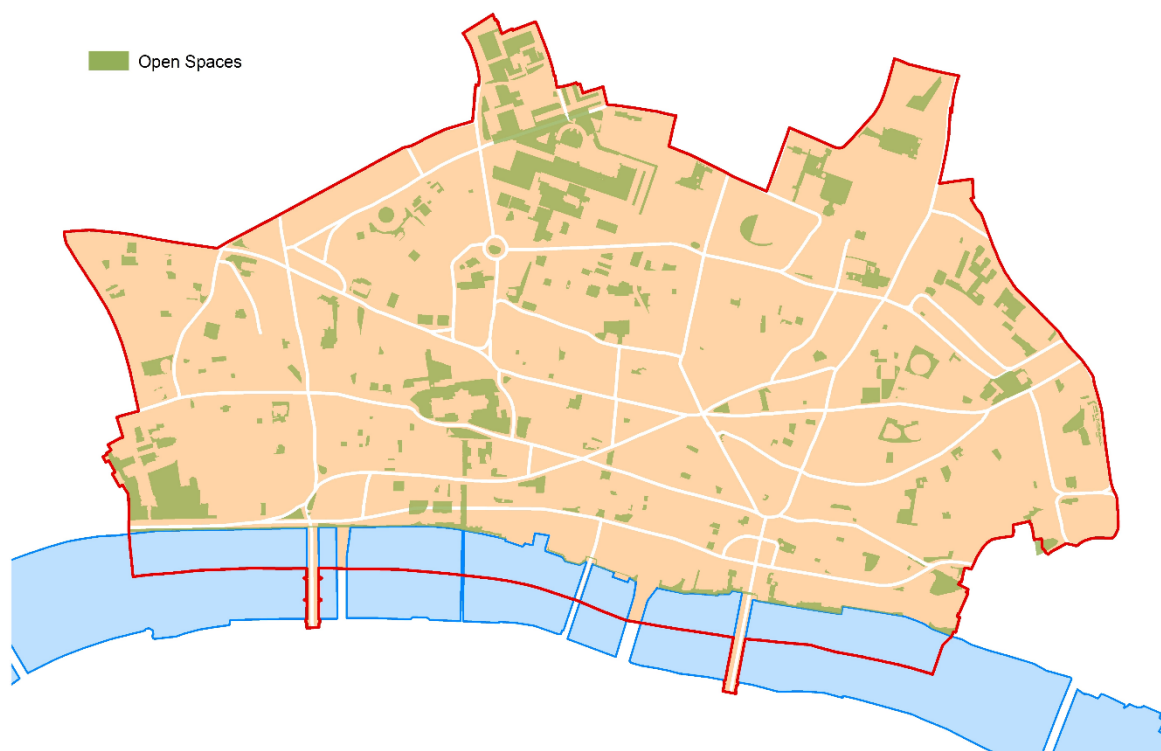


Figure 21: **Open Spaces in the City of London UPDATE TO 2019 BASE**

Policy OS2: City Greening

1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.
 - All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context; and
 - The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought but any new development should not compromise these elements on existing buildings located nearby.
 - **The loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances.**
2. Major development proposals will be required to:
 - Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City's target UGF score of 0.3 as a minimum; and
 - Submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building.

Reason for the policy

- 6.6.11. Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity enhancement, recreation, and health and wellbeing of the City's communities. This will increase in importance as weather patterns continue to change with rising average temperatures, summer droughts and more intense rainfall events periodically through the year. The inclusion of blue infrastructure such as rain gardens and rainwater harvesting can help to minimise water use.
- 6.6.12. Evidence demonstrates a positive correlation between urban greening and good mental and physical health. ~~However, t~~The provision of large green spaces in the City's high-density urban environment is difficult to achieve. Small areas of soft landscaping, green walls and green roofs, associated with buildings and the public realm, will **therefore** play a vital role in promoting wellbeing. Increased access to green spaces will be encouraged.
- 6.6.13. The City of London Corporation has long championed green roofs and continues to actively encourage them, but other forms of greening are less common in and around new buildings. The provision of trees and landscaping, and vertical greening such as green walls is **also** welcome. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they require careful design, **and** installation and regular maintenance.
- 6.6.14. Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.
- 6.6.15. There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones **(including BioSolar green roofs)** having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers prefer to install intensive green roofs with deep substrates for amenity space, these are expected to be of high-quality design incorporating rainwater harvesting for irrigation to minimise water use.
- 6.6.16. The green roof should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately **for the life of the building** to maximise the roof's environmental benefits including biodiversity, rain-water run-off attenuation and building insulation.

How the policy works

- 6.6.17. This policy ~~provides a mechanism for ensuring a consistent approach to~~ **promotes** greening for all new buildings and public realm schemes. It takes account of the value of different types of greening through the application of an Urban Greening Factor (UGF), with a higher UGF for greening that provides multiple benefits.
- 6.6.18. The ~~Draft~~ London Plan introduced a UGF scoring system for London, which is intended to operate as a tool to assess the amount, type and value of greenery within development proposals. It recommends interim target scores, pending work by individual boroughs to develop their own approaches tailored to local circumstances.
- 6.6.19. The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City. **The Study considered the potential for an UGF on a range of development types, including offices, residential, hotels and mixed commercial.** Policy OS2 ~~therefore~~ requires major development proposals in the City (commercial and residential) to include an UGF calculation demonstrating how it will meet the minimum UGF target of 0.3.
- 6.6.20. Developers will need to provide evidence to justify why the UGF target cannot be met. The City Corporation will take a flexible approach where delivery of the target UGF would detract from the heritage significance of a building or conservation area.
- 6.6.21. Development proposals could include greening of roofs, facades, terraces and balconies, both internal and external, and/or landscaping around the building depending on the circumstances of each site. The UGF assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development.
- 6.6.22. More details including a worked example of a UGF calculation are set out in Appendix 1 of the Local Plan.

Biodiversity

Policy OS3: Biodiversity

Development should **aim to secure net gains for biodiversity where possible by incorporate incorporating** measures to enhance biodiversity, including:

- Retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
- Measures recommended in the City of London Biodiversity Action Plan (**BAP**) in relation to particular species or habitats;
- Green roofs and walls, gardens and terraces, soft landscaping and trees;
- Green corridors and biodiversity links;
- Wildlife-friendly features, such as nesting or roosting boxes and beehives;
- A planting mix and variation in vegetation types which encourages biodiversity;
- Planting which will be resilient to a range of climate conditions, with a high proportion of native plants;
- **An appropriate lighting scheme designed to minimise impacts on biodiversity.**

Reason for the policy

6.6.23. Protecting and improving biodiversity involves enhancing wildlife populations and their habitats. This has associated positive impacts **to for** the environment, **the** economic and social life of the City and the aesthetics of the streetscape. Healthy biodiversity **can should** be viewed as a sign of a healthy environment and healthy city.

6.6.24. The City has 13 Sites of Importance for Nature Conservation (SINCs), including three **new** SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were designated following a review in 2016. Two existing SINCs were upgraded **to Sites of Borough Importance for Nature Conservation (SBINC)** as part of this review: Barbican and St Alphage Garden, which includes the **Fann Street Barbican** Wildlife Garden and the Beech Gardens; and **The** Roman Wall, Noble Street, which was extended **southwards** to include St Anne and St Agnes Churchyard.

6.6.25. A number of areas along the riverside, west of Farringdon Street and east of Bishopsgate have been identified as areas of deficiency in **access to** nature **conservation** by the GLA. It is important that opportunities are taken to improve biodiversity throughout the City, and particularly in areas where this would improve green corridors or biodiversity links, such as along the riverside. The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species.

How the policy works

6.6.26. Measures to enhance biodiversity should address the need to provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles) and by extension a wider range of insects and birds. **The City of London BAP provides further details about the target species and their habitats. The BAP will be kept under regular review.**

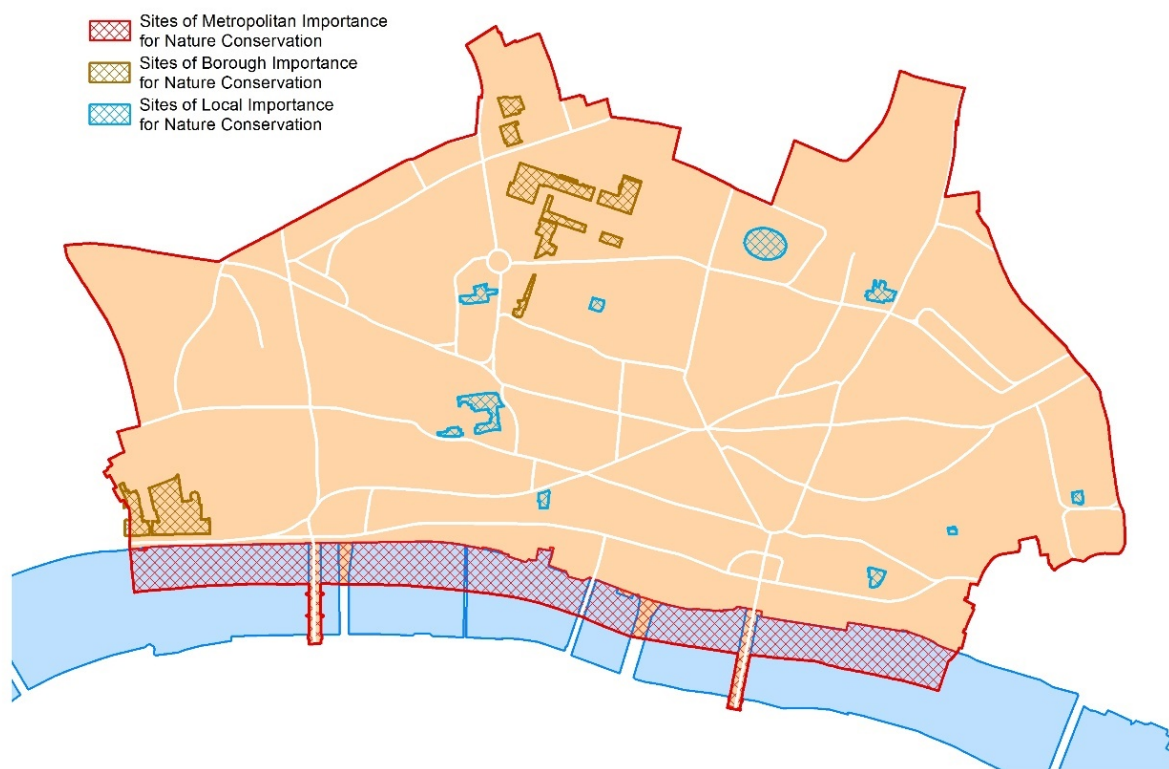


Figure 22: Sites of Importance for Nature Conservation (SINCs)

6.6.27. New developments should seek to protect and enhance biodiversity and the City's environmental assets. This can be achieved by providing spaces for biodiversity to flourish through the planting of trees and soft landscaping, along with green roofs and walls where possible. A variety of these provisions in one development will create habitats for a range of different wildlife species. Joined up green spaces and corridors give species a better chance of survival in the urban landscape and greater resilience to future climate change. These measures will assist in the delivery of the **All London wide Green Grid (ALGG) to promote the design and delivery of green infrastructure across London.**

6.6.28. **The City's wildlife depends not only on greenery but also on the built environment. Buildings can provide roosting sites for bats and nesting opportunities for birds. Artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species.**

- 6.6.29. Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.
- 6.6.30. Where development has a potential impact on designated sites of importance for biodiversity, the developer should submit an ecological statement outlining how any impacts will be avoided, minimised or mitigated. Where necessary, the City Corporation will seek independent review of an assessment, paid for by the developer.
- 6.6.31. Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. The Mayor of London will be producing guidance to set out how biodiversity net gain applies in London.

Trees

Policy OS4: Trees

The City Corporation will seek to increase the number of trees and their overall canopy cover by:

- Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate;
- Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value;
- Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value;
- Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works;
- Promoting tree planting to provide a diverse range of tree species, including large-canopy trees wherever practicable.

Reason for the policy

- 6.6.32. There are just over 2,500 trees in the City, which are found in a variety of locations: along streets, in open spaces such as churchyards and Livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.
- 6.6.33. Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to enhancing amenity and townscape. Trees provide a wide range of benefits in the urban environment, including the trapping of air pollutants, enhancing biodiversity, providing shade and shelter from sun and rain, absorbing rainwater and filtering noise.
- 6.6.34. The City of London Tree Strategy SPD aims to increase the number of City Corporation owned trees and ensure that all trees within the City are managed, preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the townscape for both current and future generations. The Tree Strategy SPD will be kept under review and should be read alongside the City of London Biodiversity Action Plan (BAP).
- 6.6.35. Trees play an important role in connecting green spaces to create green corridors. Additional planting where feasible will help to reinforce those corridors. It is important that new tree planting includes a variety of species to increase the resilience of the City's tree stock against the threat of disease and the impacts of a changing climate.

How the policy works

- 6.6.36. Developers will be expected to safeguard existing trees, plant new trees and only remove trees in exceptional circumstances. Where trees are removed during development works, replacement trees of an appropriate species, height and canopy cover must be planted when works are completed. The City Corporation will seek financial compensation for any trees removed or damaged without permission. This value will be based on a recognised tree valuation method such as the Capital Asset Value for Amenity Trees (CAVAT) or i-Tree Eco
- 6.6.37. The City Corporation will use TPOs, s106 planning obligations or conditions to ensure the retention of existing trees and the provision of new trees.

6.7. Climate Resilience and Flood Risk

Context

- 6.7.1. This section aims to ensure that the City **of London** remains resilient in the face of changing climate patterns. The main focus is on flood risk and the risk of overheating of buildings and spaces which will become more frequent as a result of climate change.
- 6.7.2. The UK Climate Projections (CP**0918**) predict that London will experience a rise in mean temperatures of between **0.6°C and 2.7°C by 2050**. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review.

Strategic Policy S15: Climate Resilience and Flood Risk

Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

- Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;
- Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
- Flood defence structures must be safeguarded and enhanced to maintain protection from climate related sea level rise.

Reason for the policy

- 6.7.3. Today's new buildings will **probably** be in place for **several** decades **or longer**, **therefore they and** must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will **help** keep the City safe and comfortable as climate patterns change. **Policy D1 sets out sustainability standards for new development in the City and the City Corporation's ambition to move to a zero emission City.**
- 6.7.4. Although the total annual rainfall **will is projected to** remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.
- 6.7.5. The City lies within the tidal section of the Thames and is therefore vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan

identifies the need for the existing flood defences in central London to be raised by up to ~~1-metre~~ **0.5m by 2065 and 1m** between 2065 and 2100 to protect London from flooding.

How the policy works

6.7.6. The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making. UK Climate Projections will form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.

6.7.7. Developers will be ~~expected~~ **required** to ~~show~~ **demonstrate** that their proposals have taken account of predicted climate change and will minimise the impacts of changed climate patterns on future occupants and the City's communities.

Policy CR1: Overheating and Urban Heat Island Effect

1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:

- solar shading to prevent solar gain, particularly on glazed facades;
- urban greening to improve evaporative cooling;
- passive ventilation and heat recovery;
- use of thermal mass to moderate temperature fluctuations;
- minimal reliance on energy intensive cooling systems.

2. Building designs should minimise any contribution to the urban heat island effect.

Reason for the policy

6.7.8. Development presents an opportunity to renew or adapt the existing building stock ~~and public spaces, or provide new buildings and spaces, to provide buildings and public spaces~~ which will cope better with changing climate patterns. ~~Design measures~~ **The design of buildings** should ~~be employed to~~ reduce energy demands from cooling infrastructure, making **buildings them** more resilient in the face of higher temperatures. Measures such as urban greening ~~and design features that provide shade and shelter~~ can have a positive impact ~~on or~~ near the building, minimising the urban heat island effect (see Policy OS2).

6.7.9. Climate adaptation measures can contribute to wider benefits by pre-empting potential detrimental climate impacts. Careful selection of plants which are resilient to a range of weather conditions will assist wildlife to survive changed climate conditions. Urban greening and reduced reliance on air conditioning will have benefits for the City's air quality.

How the policy works

6.7.10. For all major development, the City Corporation will **expect require** climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate reduced energy demand for cooling. BREEAM credits for adaptation to climate change should be targeted.

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

Policy CR2: Flood Risk

All development within the City Flood Risk Area, and major development elsewhere, must be accompanied by a site-specific flood risk assessment demonstrating that:

- the site is suitable for the intended use, in accordance with the **s**Sequential and **e**Exception tests (see tables 2 and 3) and with Environment Agency and Lead Local Flood Authority advice;
- the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere;
- safe access and egress routes are identified;
- flood resistance and resilience have been designed into the proposal.

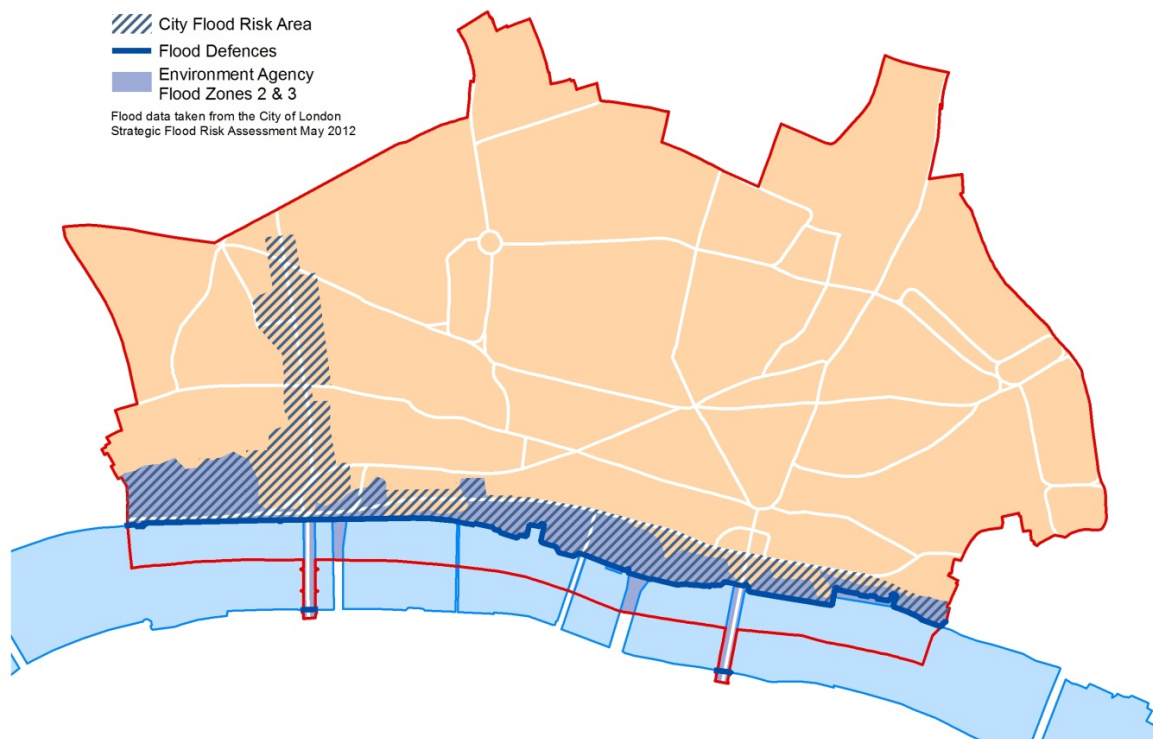


Figure 23: City Flood Risk Area

Reason for the policy

- 6.7.12. While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water/sewer overflow in the former Fleet valley.
- 6.7.13. Figure 23 identifies the areas at risk from these sources as the City Flood Risk Area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

How the policy works

- 6.7.14. Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development and where feasible and viable may be required to provide protection from flooding for properties beyond the site boundaries.
- 6.7.15. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 2 shows the vulnerability classifications and Table 3 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. Full details of the Environment Agency's flood zones are shown on the policies map. **The Sequential Test must be applied for all development other than minor development or change of use in the City Flood Risk Area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water / sewer flooding. Where a change of use results in a more vulnerable use evidence must be presented to show demonstrate safety and suitable access and egress routes.**
- 6.7.16. If the intended use of a site falls into one of the categories where an Exceptions Test is required, as set out in Table 3, the developer will need to investigate whether there is a reasonably available site outside the City Flood Risk Area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the Exceptions Test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Essential Infrastructure	• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations
Highly Vulnerable	• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Installations requiring hazardous substances consent.
More Vulnerable	• Hospitals • Residential institutions such as care homes and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Sites used for waste management facilities for hazardous waste.
Less Vulnerable	• Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure. • Police, ambulance and fire stations which are not required to be operational during flooding. • Waste treatment (except hazardous waste facilities).
Water-compatible development	• Flood control infrastructure. • <u>Sewage transmission infrastructure and pumping stations</u> • Docks, marinas and wharves. • Navigation facilities. • Water-based recreation (excluding sleeping accommodation). • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

Table 2: Flood risk vulnerability classifications relevant to the City

Source: Relevant uses from Planning Practice Guidance – Flood Risk and Coastal Change

Flood Risk Vulnerability classification	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
EA Zone 1	✓	✓	✓	✓	✓
EA Zone 2	✓	Exceptions Test required	✓	✓	✓
EA Zone 3a	Exceptions Test required	x	Exceptions Test required	✓	✓
EA Zone 3b	Exceptions Test required	x	x	x	✓
SFRA Surface water/sewer flood risk areas	Exceptions Test required	x	Exceptions Test required	✓	✓

Table 3: Suitability of different uses in flood zones

Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

6.7.17. The City of London Strategic Flood Risk Assessment (SFRA) provides guidance on suitable flood resistance measures, to prevent water entering the building, and flood resilience measures, which enable speedy recovery in the event of flooding. These should be specified for all development within the City Flood Risk Area. Passive design measures such as suitable threshold levels and the use of flood resilient materials will be favoured over active measures such as removable flood barriers. **All sleeping accommodation must be located above the modelled tidal breach level as shown in the SFRA unless it can be demonstrated that a permanent fixed barrier at the threshold of the property would prevent water ingress in a breach event.**

6.7.18. Design measures can help to reduce flooding, thus protecting the local area beyond the development site through:

- sustainable drainage systems;
- green/blue roofs; and
- rainwater reuse, recycling and attenuation

6.7.19. Resistance to flooding can be achieved through design measures such as:

- raised kerbs and altered topography which contains water at a distance from the building;
- avoiding opening windows or vents at ground floor or basement levels;
- using low permeability materials to limit water penetration of external walls, and flood resistant doors to prevent water ingress; and
- fitting non-return valves on plumbing to prevent sewer surcharge within the building.

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

- avoiding locating sensitive equipment such as computer servers at lower levels of buildings in flood prone areas;
- locating all fittings, fixtures and services at a suitable height to minimise damage by flood waters;
- using impermeable surfaces and structures; and
- providing sumps and soak-aways that gradually release water to the sewer network.

6.7.21. In order to demonstrate that the development will be safe for occupants, flood warning and evacuation plans should be provided for all 'more' or 'highly' vulnerable development within the City Flood Risk Area. Details of the type of measures which should be included in an evacuation plan are set out in the City's SFRA.

6.7.22. For minor development outside the City Flood Risk Area, an appropriate flood risk statement should be included in the Design and Access Statement.

Policy CR3: Sustainable drainage systems (SuDS)

1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as close as possible to greenfield rates and the number of discharge points has been minimised.
3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.

Reason for the policy

- 6.7.23. The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City Flood Risk Area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.
- 6.7.24. More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

How the policy works

- 6.7.25. All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.
- 6.7.26. For major development, pre-application discussion with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the Environment Agency, Thames Water and other interested parties is encouraged to

ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan Drainage Hierarchy and local requirements **set out in the City Corporation's forthcoming SuDS guidance should be discussed at pre application stage with the City Corporation as Lead Local Flood Authority for the Square Mile.**

- 6.7.27. Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.
- 6.7.28. For all major development, a separate SuDS and Drainage Plan must be submitted at application stage. For minor development the Design & Access Statement should include details of how rainwater run-off has been minimised. Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.
- 6.7.29. Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.
- 6.7.30. Arrangements for maintenance **throughout the life of the building** must be considered in the designs **of SuDS**. Planning conditions may be used to secure a suitable operations and maintenance plan.

Policy CR4: Flood protection and flood defences

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm.

Reason for the policy

- 6.7.31. The City of London is protected from flooding by the Thames Barrier, and more locally by flood defence walls along the River Thames. The Thames Estuary 2100 **(TE2100)** project recognises the need for the raising of flood defences by up to 0.5m by 2065 and 1m by 2100.

How the policy works

- 6.7.32. Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future **flood** defence raising without adverse impacts on river views, **the setting of historic buildings** and pedestrian movement along the riverside walk. **Constraints may exist where flood defences form part of an existing building.** Discussions with the Environment Agency will be required to establish the most effective designs for improved flood **defences and to**

incorporate adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.

- 6.7.33. A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

6.8. Circular Economy and Waste

Context

6.8.1. The City Corporation is the Waste Planning Authority (WPA) for the Square Mile, with a statutory duty to plan for all the waste that is generated in the City. With no waste treatment plants in the City, the City Corporation relies on WPAs elsewhere to provide such facilities. By applying circular economy and waste hierarchy principles: designing for durability and modularity, making better use of under-used assets through sharing, reusing products and materials and recycling as much as possible, waste can be designed out. This approach will reduce waste exports from the City whilst application of the proximity principle will ensure that residual waste is processed as close as possible to the City.

Strategic Policy S16: Circular Economy and Waste

1. The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities in planning for capacity to manage the City's residual waste through:
 - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other London Waste Planning Authorities;
 - Co-operating with Waste Planning Authorities within and beyond London to plan for suitable facilities for the City's waste;
 - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste;
 - Monitoring waste movements to and from the City and reviewing its waste arisings and capacity study at least every five years.

Reason for the policy

- 6.8.2. The City Corporation has responsibility to plan for adequate facilities to manage the waste that originates in the City. This includes waste collected from the City's households and businesses, waste generated in the process of redevelopment and hazardous waste from premises such as St Bartholomew's Hospital.
- 6.8.3. The London Plan and the London Environment Strategy set the framework for waste management in London. These strategies promote circular economy principles and the waste hierarchy: prevention, preparing for reuse, recycling, other recovery, and **disposing disposal** only as a last resort.
- 6.8.4. The current London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage 100,000 tonnes of waste annually until 2036. In the draft London Plan, the proposed apportionment for the City is reduced to **84,000** tonnes per annum in 2021 and **89 90,000** tonnes per annum in 2041.

This figure represents the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's household and commercial and industrial waste from 2026.

- 6.8.5. The London Plan sets out criteria for the selection of waste management sites, which the City of London *Waste Arisings and Waste Management Capacity Study review 2016* used to evaluate potential sites in the City. This study concludes that, with current technologies and economic considerations, there is no viable waste management capacity within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries.
- 6.8.6. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London **Joint** Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum and will work with the GLA and the Environment Agency to improve waste planning.
- 6.8.7. For commercial reasons, a proportion of the City's waste will continue to be transported to sites outside London. This includes construction, demolition and excavation (CD&E) waste which is not covered by the Mayor's targets for net self-sufficiency. Annual monitoring of such waste exports will inform Duty to Co-operate discussions with receiving authorities within and outside London to ensure that sufficient capacity remains in the planning pipeline.
- 6.8.8. The London Plan sets out borough apportionments for land-won aggregates which should be reflected in local plans. No apportionment is made for the City of London and there is no requirement to include a policy for minerals within the Local Plan. **Application of circular economy principles encourages the re-use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported aggregates.**
- 6.8.9. It is imperative that the City adopts circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment.

How the policy works

- 6.8.10. The City Corporation will continue to monitor the quantities and types of waste originating in the City and work with the City's communities to minimise this waste, **applying circular economy principles to design out waste and pollution and keep products and materials in use.** The City Corporation will continue to work with the South-East London **Joint** Waste Planning Group and other Waste Planning Authorities in London and beyond to ensure that the City's waste apportionment is met and that suitable facilities are available for the City's waste to be managed in the most sustainable way.

- 6.8.11. Changing economics and new waste management technologies means that small scale waste management is becoming more viable within the City, particularly within large development sites.
- 6.8.12. During the period 2018 – 2036 a proportion of the City of London's waste will continue to be managed outside London. Co-operation with waste planning authorities outside London will aim to ensure that facilities with sufficient capacity remain available to accept the City's waste during this period.
- 6.8.13. The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.

Policy CEW1 Zero Waste City

1. Development should be designed to promote circular economy principles throughout the life cycle of the building through:
 - Flexible building design to accommodate evolving working and living patterns reducing the need for redevelopment;
 - Re use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources;
 - Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials;
 - Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage;
 - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.
2. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.

Reason for the policy

- 6.8.14. The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.

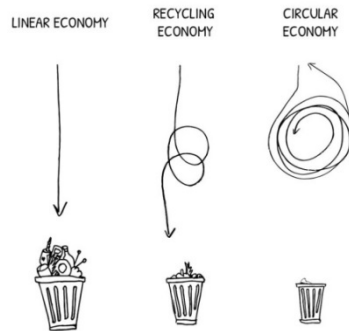


Figure 24: Circular Economy

6.8.15. The design of buildings impacts on the potential for implementation of the waste hierarchy during their operational stage, through the facilities and waste management services that are incorporated into the design. For example, reliance on single use coffee cups and disposable plastics can be reduced by incorporating kitchen facilities and water fountains into building designs; **and** waste movements can be reduced by managing food waste on-site through composting or anaerobic digestion. These facilities must be considered at the building's design stage.

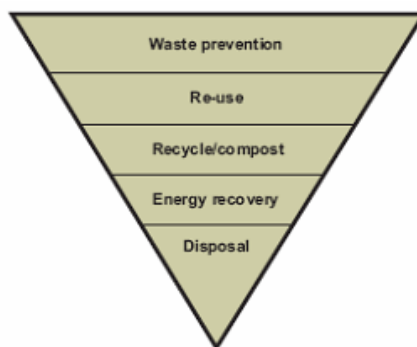


Figure 25: Waste Hierarchy

6.8.16. Waste prevention is the most desirable action **on in** the waste hierarchy as it results in no waste whatsoever. Re-use is the next most desirable option as it involves products and materials being used again for their original intended purpose. Recycling is the next most preferable option, involving the collection of used items and processing them into raw materials to be remanufactured into usable products or materials. The recovery of energy, through techniques such as anaerobic digestion, is a way of getting the most out of otherwise useless waste. Disposal should be the absolute last resort, after all the other options have been exhausted.

6.8.17. On **large sites major developments** opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and beyond the City. The City of London Waste Arisings and Capacity Study identifies a range of options which should be considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.

6.8.18. Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage **in the of design of developments** to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be **considered taken into account**, where necessary.

How the policy works

6.8.19. Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged. **The level of detail required at the planning application stage will be proportionate to the scale of development.**

6.8.20. The Environmental Statement (for EIA applications) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

EIA Development

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

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

Other Major development

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

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

All other development

- 6.8.25. For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.
- 6.8.26. Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term-lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.
- 6.8.27. The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.

Policy CEW2: Sustainable Waste Transport

The environmental impact of waste transport will be minimised through:

- Encouraging the use of **the river rail and waterways** for removal of waste, including deconstruction waste and delivery of construction materials;
- Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;
- Requiring low and zero emissions transport modes for waste movement;
- Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi-site consolidation of waste.

Reason for the policy

- 6.8.28. The proximity principle advocates that waste should be managed as close as possible to where it originates, to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.
- 6.8.29. Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.

6.8.30. This policy aims to maximise the use of the River Thames for waste transport, encourage transport modes such as rail and other waterways and encourage efficient use of low and zero emissions road vehicles for transporting waste.

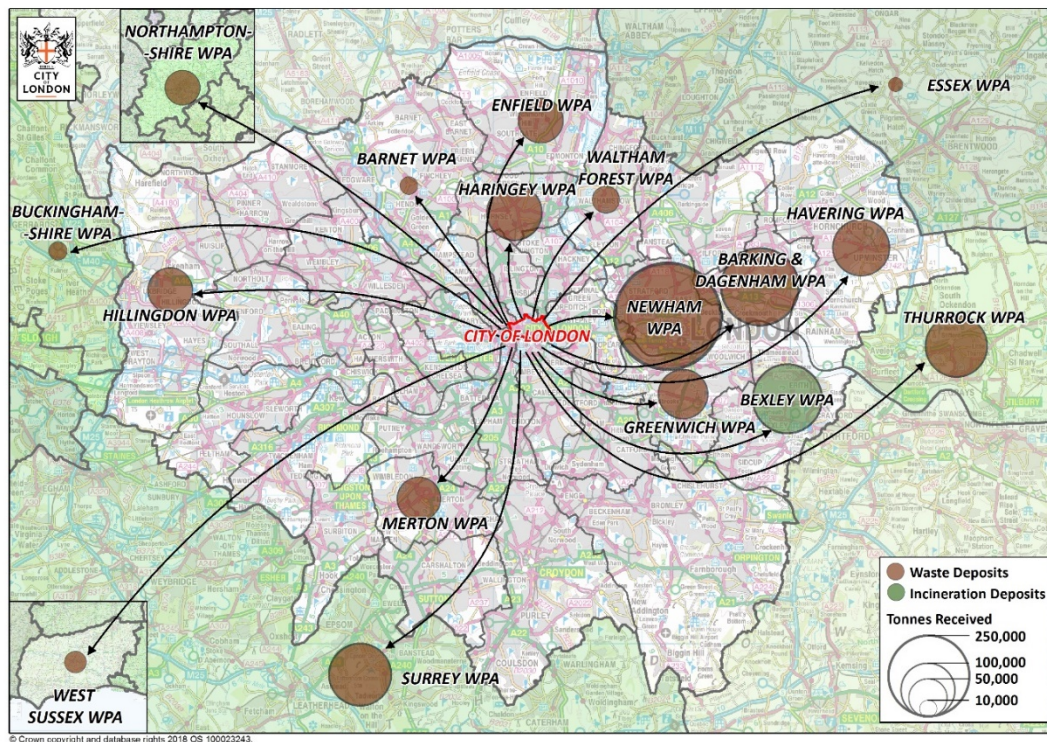


Figure 26: Destinations for the City's waste 2012-2016 UPDATE WITH NEW DATA FROM THE WASTE INTERROGATER

How the policy works

6.8.31. Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be **taken into account a key matter** in consideration of proposals. Mitigation **which resolves potential conflicts** may be necessary **to allow for** development to proceed **where a potential conflict is identified**.

6.8.32. The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste.

Major development

6.8.33. Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles **will be** enabled during the operational phase of the building's life.

All other development

6.8.34. Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed.

Policy CEW3: New waste management sites

1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:
 - the development will handle waste which has been generated locally;
 - access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
 - the carbon impact of the development will be minimised. New waste facilities should comply with the Mayor's Carbon Intensity Floor (CIF);
 - the development is designed with resilience to natural and man-made safety and security challenges.
2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf and development which would compromise the use of the river for waste operations, will be resisted
3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.

Reason for the policy

6.8.35. Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

How the policy works

6.8.36. The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and **appropriate** conditions will be applied to ensure that any new facility is suitable for the City's high-density urban environment.

This page is intentionally left blank