



Local Plans Sub (Planning and Transportation) Committee

Date: MONDAY, 3 FEBRUARY 2020
Time: 1.45 pm
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

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

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

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes of the meeting held on 14 January 2020.

For Decision
(Pages 1 - 6)

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 7 - 68)

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

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

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE **Tuesday, 14 January 2020**

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Tuesday,
14 January 2020 at 1.45 pm

Present

Members:

Deputy Alastair Moss (Chairman)
Sheriff Christopher Hayward (Deputy Chairman)
Randall Anderson
Christopher Hill
Shravan Joshi
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
John Harte	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Annie Hampson	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Michelle Price	- Department of the Built Environment

1. APOLOGIES

Apologies for absence were received from Deputy Keith Bottomley, Deputy Jamie Ingham Clark and Graham Packham.

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 19 July 2019 were considered and approved as a correct record.

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

The Sub-Committee received a report of the Director of the Built Environment highlighting the main changes that were now proposed to the earlier November 2018 version of the draft Local Plan supplemented by a track changes appendix covering all the citywide policies.

Officers reminded Members that there had been some informal, Working Party meetings towards the end of 2019 looking at certain elements of the Plan but that today's meeting was a chance to review the redrafted document in its entirety. Officers went on to state that the amendments to city wide policies had been informed by consultation responses, the wider planning context and Member input to date. The next meeting of this Sub-Committee would afford Members the opportunity to review final documents around key areas of change, the 'Safe and Secure City' sub section which was awaiting further input from relevant officers, and the implementation sub section.

Members were informed that the key changes to the document were listed at paragraph 8 of the report and that some of these were new elements whilst others were changes to existing elements of the Plan.

Officers reported that there were still some potential risks/outstanding issues to be considered as background to the draft Plan preparation process. One of these was the London Plan with which the City Corporation's own document was required to be in general conformity with.

The London Plan Inspectors' Report has supported the document but recommended changes including a reduction in the overall housing target for London and reductions for a number of boroughs. The Government has not yet responded to the recommended changes and the issue has not yet been resolved. The Deputy Chairman explored this further by questioning whether the issues that the Government had raised with the London Plan around housing in particular would have any bearing on the City Corporation's plan. Officers advised that the recommended reduced housing targets did not apply to the City and so this issue did not have a direct bearing on the draft Local Plan, unless it caused further delays in the final publication of the London Plan.

Officers then stated that housing delivery performance could be a potential risk for the Local Plan process going forward. Recent delivery performance had been volatile and several significant housing proposals had not progressed as anticipated. This was an issue if they consequently could not be counted as part of the future housing delivery pipeline. The potential issue is partly due to how housing delivery performance is being measured by the Government (in three-year snapshots) whereas the draft Plan is looking at average delivery rates over a 15-20-year time horizon. Housing delivery in the City tends to be "lumpy" and dependent on a few large schemes. For these reasons, it was suggested that the City Corporation may need to take up this issue with Government going forward, requesting a greater degree of flexibility.

The Chair interjected by referring to the fact that the grand Committee were very keen to receive assurances on the viability of the Plan. Officers reported that the viability report on the Plan as a whole had been commissioned and was expected to be completed in February 2020. This report will include the scope for Section 106 affordable housing contributions and/or CIL contributions to be increased going forward. If the report supports such an increase this information could then be factored into a revised Supplementary Planning Document (SPD) which would be put to the grand Committee in May 2020 prior

to be putting out for consultation and adoption by September 2020. A Member commented that the issue was around the costs of housing delivery and not whole plan viability. Current policy stated that affordable housing had to be delivered onsite, or offsite through a commuted sum in exceptional circumstances. Current policy, however, meant that it was cheaper to deliver offsite.

Officers responded that the national policy framework recommended assessing the viability of the entire Plan including realistic affordable housing contributions. The intention being that developers would not then be able to challenge the viability of individual sites unless, for example, it could be demonstrated that a particular site was highly unusual. They added that, whilst the plan was a 20-year Plan, national guidance requires that plans be reviewed every 5 years. Consultants would be reviewing whether or not the current policies, as drafted, were viable across the City and, within that, the potential for increased s106 and CIL contributions. Officers concluded on this point by highlighting that they would also be liaising with colleagues in the Housing Department on this matter ahead of the production of an SPD. They agreed with the underlying concern that the current figure was now out of date.

A Member reiterated his concern that, if the consultants were to come back with relatively low 'head-room' on this, it would mean that the current draft policy was problematic and would lead to 'in lieu' payments becoming routine.

The Chair stated that the City Corporation, following consultation, should be clear as an authority that they were confident about their figures and would therefore not expect developers to regularly challenge these. Officers agreed by stating that site by site viability issues would not be desirable going forward.

A Member commented by stating that the housing market was constantly moving and that what could potentially occur, should the top end of the market continue to collapse, is that housing delivery per se would become increasingly difficult with many local authorities then facing penalties from government around this. He added that, unless use of land was constrained in any way, it would always go to whomever offered the best return. He remained concerned that the framework around this could cause great difficulties going forward. Officers advised that one response could be to constrain some land through a process of housing site allocations.

The Chair invited comments from the Sub-Committee on the list of key changes detailed within the report.

A Member made a generic point on Section 6.5 'Tall Buildings and Protected Views' and referred to what he perceived as a general shift in language/ tone which appeared to be more conservative and restrictive than had previously been the case, particularly in relation to protecting views of the Tower of London. Officers tabled a number of maps depicting the protected views referred to within the plan. They added that amendments to the wording here had been an attempt to reflect the wishes of Members at the September 2019 Working Party. They assured members that there was no shift in policy here but

a clarification of current practice within both the plan and on the maps. It was also hoped that this would go some way to satisfying the concerns around this matter raised by some consultation respondents such as Historic Royal Palaces (HRP).

Another Member stated that he too had some concern around the Tower 'backdrop' language as currently drafted. Officers undertook to revisit this in light of comments made and present an amended draft of this section to the next meeting of the Sub-Committee. The Chair requested that some preamble to this section, stating that this was intended as a clarification of the current position would be helpful.

A Member referred to the use of 3D modelling for planning applications and questioned the decision here to go with a single service provider. He added that this might be considered unnecessarily restrictive, particularly given that this was an area of technology that was still very much evolving. Officers undertook to look again at this wording, clarifying that it was not necessarily requiring applicant to use the same software, but was more around compatibility with the City Corporation's chosen system. The Chair applauded this step forward.

In response to questions, it was agreed that the wording at section 6.2.39 regarding Heliports and landing facilities for drones, should be further refined.

A Member questioned why Officers had chosen to add paragraph 1.3.28 entitled 'What if things change?' to the introduction section of the plan. Officers stated that this was taken largely from the current Local Plan and was intended as a risk analysis of sorts. It was intended to follow on from the paragraphs relating to implementation and delivery, but Officers stated that, again, they could look to finesse the wording here. The Chair stated that he felt that this paragraph was a good caveat to include. A Member added that he felt that it would be useful to make reference to timescales here so that it was not inferred that the plan was under constant review.

A Member referred to paragraph 3.5.2 and questioned what progress had been made in terms of Climate Change given that references here were all very high level. Officers reported that this was intended as a 'hook' within the draft Plan. It was reported that a Climate Action Strategy was being drafted in 2020 and that revisions to this paragraph might elaborate on timescales around this.

The Member went on to refer to 'Policy D1 – Sustainability Standards' and questioned how this was measured. He also noted that paragraph 2 of this subsection made reference to both 'excellent' and 'outstanding' BREEAM ratings and questioned which of these was the target. Another Member stated that he hoped that this would take into account embodied carbon and the demolition of existing buildings. The Chair responded by stating that he had understood that there was now a presumption that the whole carbon life of a building would be looked at. Officers clarified that this policy related to buildings in operation and not deconstruction. They undertook to look into this matter and report back.

In response to questions regarding 'Policy H8 – Older persons housing' Officers stated that policies had previously referred to lifetime homes but that the guidance around this no longer existed, therefore making it more difficult to define as a concept. Officers stated that they would be happy to re-visit the drafting of this.

A Member referenced Policy D5 – 'Terraces and Viewing Galleries' and highlighted that noise was also an issue here and should therefore be referenced alongside overlooking. The Chair agreed with this addition.

RESOLVED – That Members:

- Agree the sections of the Proposed Submission City Plan 2036 set out at Appendix 1 of this report, subject to the comments made today being adequately reflected within this; 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.

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

There were no questions.

6. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

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

The meeting ended at 2.38 pm

Chairman

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Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 03/02/2020
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 those sections of the Plan which were not considered by the Sub-Committee at its last meeting on 14th January 2020. 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.

This report also includes changes suggested to address comments made by Members at the Sub-Committee meeting on 14th January 2020. 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 Appendices 1 and 2 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 those sections of the Proposed Submission version of City Plan 2036 which were not considered by the Sub-Committee at its last meeting on 14th January 2020. They comprise:
 - Section 4.2 (Safe and Secure City), which has now been considered by the Senior Security Board;
 - Section 7 (Key Areas of Change), which sets out policies relating to seven identified areas of the City which are likely to experience significant change over the Plan period. This section also includes an overarching policy which applies to the whole of the City's riverside.
 - Section 8 (Implementation), which contains policies relating to planning contributions and viability appraisals.
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. Copies of updated maps and diagrams relating to the Key Areas of Change, together with an updated Key Diagram, will be tabled at the meeting.
7. Attached at Appendix 2 of this report are some proposed changes to the citywide policies which were considered by the Sub-Committee at the meeting on 14th January 2020. These changes have been suggested to address comments made by Members at the January meeting and are highlighted in shaded text. Extracts have been taken from the Plan featuring the relevant changes to avoid reproducing the entire Plan.

Key Changes

8. Although extensive changes are proposed to some of the policies in Appendix 1, the vast majority of these are factual updates or relatively minor additions or amendments.
9. Officers consider that only one significant change is proposed, which is to extend the Fleet Street Key Area of Change to include Ludgate Hill and to rename it the Fleet Street and Ludgate Key Area of Change. This reflects consultation comments received on behalf of an emerging partnership of landowners in the area, who indicated that there is scope to recognise more strongly and enhance the importance of the Fleet Street/Ludgate Hill spine which forms part of the historic processional route between Westminster and the City. It also responds to comments from the Surveyor to the Fabric of St Paul's Cathedral and the Cathedrals Fabric Commission for England, who felt that the importance of St Paul's had been somewhat overlooked in the draft Plan and highlighted the great potential that exists to improve the quality of its immediate surroundings and the experience of approaching the Cathedral building from the south and west along the processional route.

Minor editorial changes

10. 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.
11. 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

12. 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.
13. 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.
14. 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

15. 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.
16. 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

17. 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
18. 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

19. 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: section 4.2 (Safe and Secure City), section 7 (Key Areas of Change, and section 8 (Implementation)
- Appendix 2 – Extracts from the Proposed Submission City Plan 2036 showing changes made to address comments at the Sub-Committee meeting on 14th January 2020

Background Papers

None

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Appendix 1

4. Safe and Secure City

- **Context**

4.1.1. 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.

4.1.2. 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.**

4.1.3. 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, **learn**, work, **and** visit, **study and socialise**. The Partnership meets regularly and publishes **a Strategic Plan, which identifies the following outcomes for 2019-2022: – an annual strategy document, which identifies key priorities. These currently comprise:**

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

- ~~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.~~

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

4.1.5. 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 **designing out crime** **and** 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

4.1.6. 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

4.1.7. 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**.

4.1.8. 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. **Where appropriate, developers will be required to contribute towards the funding of measures designed to enhance security.**

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

4.1.9. 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.

4.1.10. 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.

4.1.11. 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

4.1.12. 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.

4.1.13. 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

4.1.14. 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.

4.1.15. 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.

4.1.16. 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

4.1.17. 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.

4.1.18. 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.

4.1.19. 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 and proportionate** on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, **or within a wider area where area based security measures are proposed.**
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

- 4.1.20. **Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and may be applicable to crowded spaces around a development as well as the building itself. Security measures should be proportionate to the risk and the likely consequences of an attack, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.** Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage.

How the policy works

- 4.1.21. 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.
- 4.1.22. 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.**
- 4.1.23. 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.**
- 4.1.24. 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.**

4.1.25. 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.

4.1.26. 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.

7. Key Areas of Change

Introduction

- 7.1.1. This section of the Plan sets out area-based policies and proposals relating to seven 'Key Areas of Change', together with an overarching policy which applies to the whole of the City's riverside. The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus.
- 7.1.2. Identifying Key Areas of Change provides a policy framework for bringing forward beneficial change within those areas, including the delivery of key development schemes, improving accessibility and the quality of the public realm, and introducing new uses or mixes of uses. The Key Areas of Change also provide a strategic context for the development of projects and funding bids by a range of City Corporation departments and external partners.
- 7.1.3. The Key Areas of Change are shown indicatively on the Key Diagram and on the individual diagrams that accompany each area policy.
- 7.1.4. **Where appropriate, the City Corporation will prepare further guidance to support the delivery of the vision for particular Key Areas of Change. This may take the form of planning briefs or supplementary planning documents and will be produced in partnership with key stakeholders and local landowners.**

INSERT DIAGRAM FOR THAMES POLICY AREA

7.2. Thames Policy Area

Context

- 7.2.1. The River Thames is an iconic feature of London that forms the southern boundary of the City and plays a major role in its prosperity and everyday life. The riverside provides a breathing space from the busy environment which characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames.
- 7.2.2. The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City and a Site of Metropolitan Importance for Nature Conservation (**SMINC**). The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.
- 7.2.3. The London Plan requires the City's Local Plan to designate and ensure the maintenance of a Thames Policy Area and to take account of emerging Maritime Spatial Plans prepared by the Marine Management Organisation. Policy ~~S16~~ **S17** sets out the policy considerations which apply to the whole of the City's riverside, as defined on the Policies Map. Further detailed guidance is provided in the City Corporation's Thames Strategy SPD. The City Corporation's Riverside Walk Enhancement Strategy sets out its plans for public realm enhancement along the riverside, ~~and the riverside walk which~~ forms part of the Thames Path National Trail.
- 7.2.4. The River Thames changes character on its way through the City, as it does through London. It includes areas where very limited change is likely to occur, such as at The Temples. However, two areas, at Blackfriars and the Pool of London, have been identified as Key Areas of Change because they are places where **regeneration renewal** is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. Policies relating to Blackfriars and the Pool of London follow the overarching policy for the Thames Policy Area.

Strategic Policy S17: Thames Policy Area

The unique character of the City's riverside, and its **functional** uses for transport and recreation, will be enhanced by:

1. Designating the Thames Policy Area and preparing and keeping under review a Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.
2. Co-operating with neighbouring boroughs to develop a joint Thames Strategy for the central section of the River Thames.
3. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk Enhancement Strategy, particularly through:
 - protecting public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe;
 - improving access to the River Thames **by enhancing north-south routes and the creation of a continuous riverside walk**;
 - improving the vibrancy of the riverside by encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value;
 - **provision of publicly accessible roof terraces, where they do not impact adversely on protected views, the amenity of occupiers or nearby residents**;
 - supporting the Illuminated River project to deliver more sustainable bridge lighting and engage visitors with the River.
4. Supporting, and safeguarding land for, the construction of the Thames Tideway Tunnel.
5. Promoting the **functional** use of the River Thames and its environs for transport, navigation and recreation, particularly through:
 - safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
 - encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
 - retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
 - refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
 - resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special

connection with the City and the River Thames, be used for a river-related purpose and not have a detrimental impact on navigation or the environment;

- maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

6. Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.

Reason for the policy

7.2.5. There are a range of different strategies and plans which affect the Thames including:

- The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area.
- **The Mayor of London's Safeguarded Wharves Review, which started in 2018 and aims to ensure that London's need for waterborne freight-handling uses is met.**
- The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues.
- The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements.
- The **UK Marine Policy Statement and the** emerging South East Marine Plan produced by the Marine Management Organisation, **which** will provide a wider strategic context. **Until that Plan has been adopted, reference should be made to the UK Marine Policy Statement, which sets out a framework and UK high level marine objectives.**

7.2.6. The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with **riparian** neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

7.2.7. The **draft** London Plan notes that no joint strategy currently exists for the central section of the Thames between Chelsea and Tower Bridge, and the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy. **The City Corporation is undertaking research into the practical implications of raising the City's flood defences in line with the Thames Estuary 2100 Plan and is collaborating with neighbouring boroughs to promote shared learning and a common approach by all riparian authorities in central London.**

7.2.8. A key infrastructure project is the development of the Thames Tideway Tunnel, which is a 25km tunnel running mostly under the tidal section of the River Thames through central London. It is intended to capture and divert storm overflows, including the Fleet Combined Sewer Outflow at Blackfriars, to Beckton Sewage Treatment Works to avoid discharging them into the river. Construction works started in 2016 and will run into the early 2020s.

7.2.9. The 'Illuminated River Project' is **an a long-term** art installation that involves the architectural illumination of bridges across central London. The project will animate the river and create further opportunities to develop the riverside walk for the enjoyment of visitors and London communities. The scheme **commenced in summer 2019 and when complete** will incorporate 15 bridges in total, of which six are partly or wholly in the City of London.

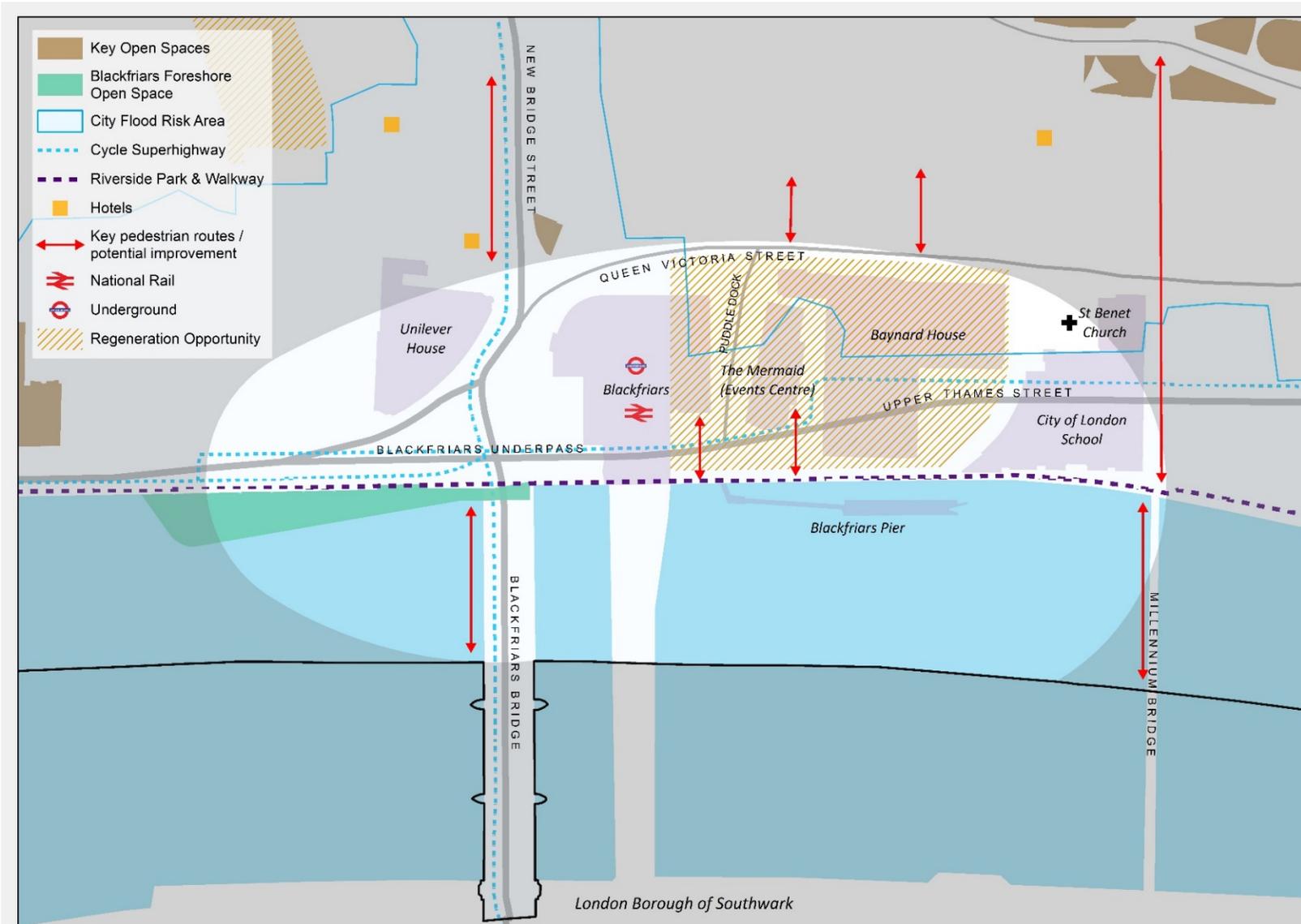


Figure 27: Blackfriars Key Area of Change-AMEND – CHANGE REGNERATION OPPORTUNITY TO RENEWAL OPPORTUNITY; CHANGE BLACKFRIARS OPEN SPACE TO PUBLIC REALM

7.3. Blackfriars Key Area of Change

Context

- 7.3.1. The area contains a mix of uses, including offices **and commercial uses**, the City of London School, the Mermaid Events Centre, The **Guild** Church of St Benet Paul's Wharf, a public **Car Park**, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, little or no active frontages and a lack of open space.
- 7.3.2. It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the Riverside Walk from the rest of the City. Access to the Riverside Walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark and Blackfriars Station is a major Underground and Rail station.
- 7.3.3. There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new **area of public realm space** built out into the river west of Blackfriars Bridge. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views.

Strategic Policy S18: Blackfriars

The character and amenities of the Blackfriars Key Area of Change will be enhanced by:

1. Promoting substantial redevelopment or refurbishment of existing post-war buildings to provide new high-quality office and commercial accommodation with active frontages at ground floor level.
2. Implementing the Thames Tideway Tunnel project and creating a high-quality new **area of public realm open space** at Blackfriars Bridge foreshore.
3. Enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside and the provision of new and improved links across **Queen Victoria Street and** Upper Thames Street **to provide new north-south routes**.
4. Encouraging cultural events, arts and play in public spaces, **ensuring the retention or renewal of existing facilities, where appropriate**.
5. Improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of **The Guild Church of** St Benet Paul's Wharf.

Reason for the policy

- 7.3.4. This area contains some post-war development which is underused and does not contribute to the context or setting of its location. Except for the area adjacent to Blackfriars Station, this part of the City lacks vibrancy and due to the road network is notable for a relative lack of pedestrian permeability. Blackfriars has been identified as a Key Area of Change to facilitate beneficial commercial redevelopment, although this may be a medium or longer-term option due to existing leasehold arrangements.
- 7.3.5. Baynard House is a large office site and data centre, which includes a public car park. It is key to the potential **regeneration renewal** of Blackfriars, since redevelopment of this site would provide an opportunity to improve the quality of architecture and sense of place, to redesign the road network to reduce the dominance of vehicular traffic and to achieve direct pedestrian routes to the riverside.
- 7.3.6. Significant redevelopment would provide an opportunity for public realm improvements along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. New active frontages will be sought as an integral part of any redevelopment. Pedestrian links across Upper Thames Street will be improved wherever possible to link the riverside to the rest of the City and to provide easier access to Blackfriars Pier. Proposals for redevelopment and the redesign of streets would be required to enhance the setting of **The Guild Church of St Benet's Paul's Wharf** and **improve it as a make it a more** pleasant area to visit and dwell.
- 7.3.7. The public **realm open space** created by the Thames Tideway Tunnel project at Blackfriars Bridge, will introduce additional greenery to the riverside and will bring more activity to the area by providing a new place for relaxation and recreation. This **facility space** will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new **area of public realm open space**, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route between Blackfriars Bridge and Millennium Bridge. There is potential to enhance heritage assets and their setting by increased pedestrian permeability and there will be new views of Blackfriars Bridge and this part of the City from the new **area of public realm open space**.

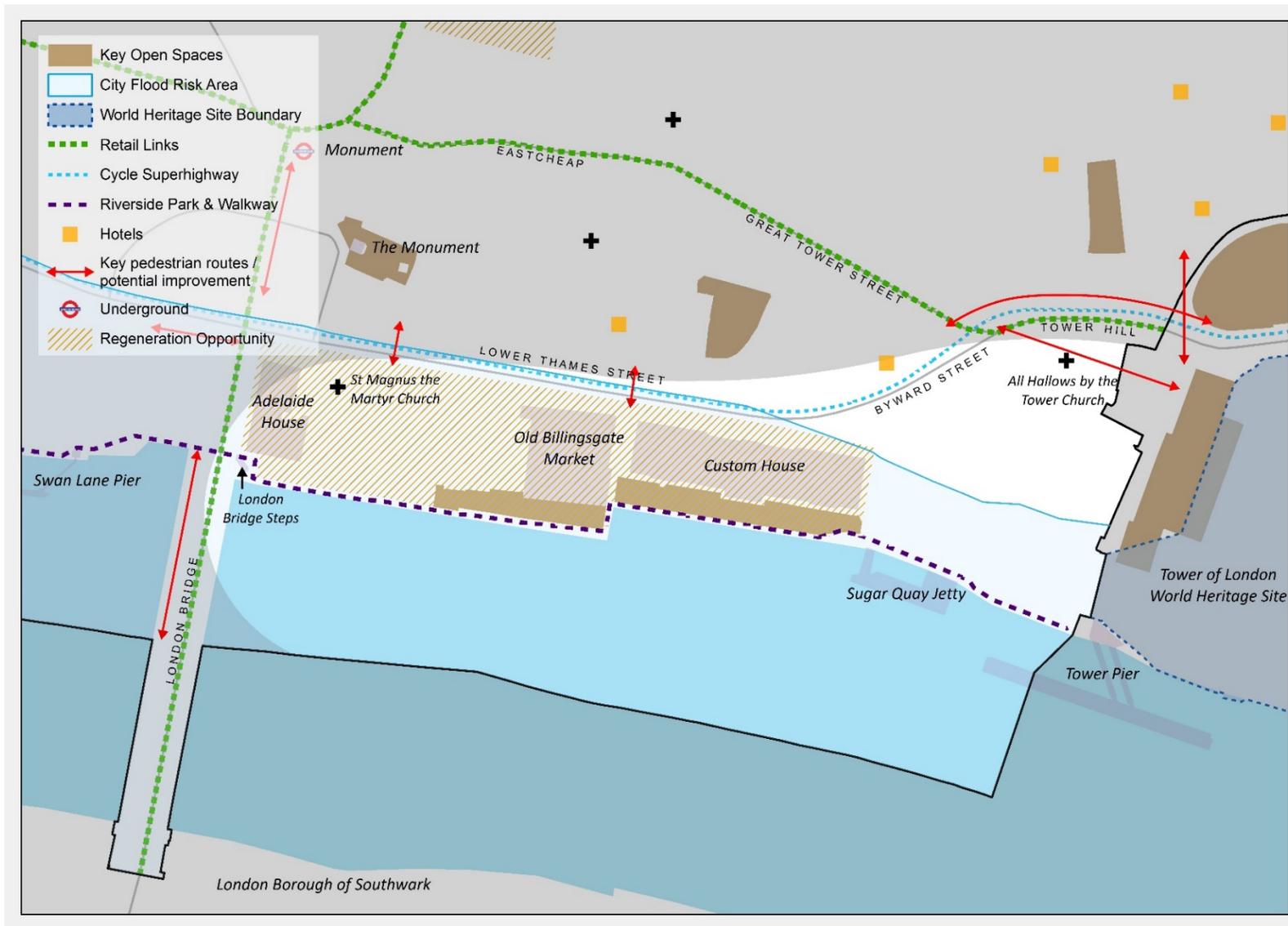


Figure 28: Pool of London Key Area of Change – CHANGE REGENERATION OPPORTUNITY TO RENEWAL. ADD PEEDESTRIAN ROUTES FROM RIVERSIDE WALK TO LTS

7.4. Pool of London Key Area of Change

Context

- 7.4.1. The area is the heart of what was once a **major London's** port which now contains predominately office and commercial uses, with some residential and hotel use and small-scale retail adjacent to the Tower of London. There are no tube or train stations within the area but it is well served by public transport just outside the area, including London Bridge Station, Tower Hill and Monument Underground Stations, Tower Gateway DLR Station and the bus route along Eastcheap. River passenger services operate from Tower Pier.
- 7.4.2. Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is **very** poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge, however the public realm is **tired and** uninspiring and does not reflect the importance of this area. There is limited retail or ground floor vibrancy in this area.
- 7.4.3. The building stock is a mix of offices, **and** listed buildings, with modern residential and hotel development to the east. St Magnus the Martyr Church, All Hallows by the Tower Church and Custom House are Grade I listed. Adelaide House **and** Old Billingsgate Market **are Grade II listed, while and** Custom House Quay, cranes and stairs are Grade II* listed. Listed buildings and their key features should be enhanced. The eastern part of this area is within the local setting of the Tower of London World Heritage Site. The height of new buildings is limited by strategic and locally protected views.
- 7.4.4. A number of buildings are likely to be vacated in the short term, providing an opportunity for **renewal through redevelopment** ~~enhancement of heritage assets and/or refurbishment~~ and public realm improvements, **which enhance heritage assets**. The aim is to achieve a City riverside which complements that on the ~~S~~south bank of the ~~p~~Pool of London.
- 7.4.5. The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath Billingsgate Market and **the** Billingsgate Bathhouse are Scheduled **Ancient** Monuments.

Strategic Policy S19: Pool of London

The Pool of London Key Area of Change will be **regenerated renewed** through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:

1. Enabling office-led redevelopment or refurbishment, **of the existing building stock**, including the provision of retail, cultural and leisure uses which are complementary to, and do not detract from, the primary business function of the City.
2. Requiring and encouraging increased vibrancy and active frontages at ground floor level, through the provision of **retail and** publicly accessible **retail**, leisure and cultural uses on the river frontage. **~~New publicly accessible roof terraces and spaces will be required, where they offer good river views and do not impact adversely on the amenity of occupiers or nearby residents.~~**
3. Encouraging the provision of cultural events, arts and play in public spaces along the riverside. **~~where they enhance public areas.~~**
4. **Preserving and enhancing the area's significant heritage assets and historic significance as well as potential views that traverse the area.**
5. Improving transport connections and pedestrian links by:
 - improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
 - **improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;**
 - improving signage to and from the Pool of London to the Tower of London;
 - improving the servicing of buildings **through encouraging** the development of shared servicing bays and access points and collaborative management;
 - restricting vehicular access to the riverside walk with the removal of private car parking areas upon redevelopment.
6. Enhancing public realm and public spaces by:
 - enhancing the Riverside Walk to create a continuous **riverside park publicly accessible and** walkway free of cars between London Bridge and Tower Bridge **and ensuring that pedestrian routes which** are accessible to all;
 - identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and **requiring greening of** buildings on redevelopment;
 - seeking additional public space and play facilities.

Reason for the policy

7.4.6. The Pool of London provides a visual gateway to the City of London from the Thames and **to is** the historic port of London. A number of the existing buildings

are likely to become vacant in the short term and this provides an opportunity to **enhance and renew regenerate** the area to provide a high-quality environment for businesses, visitors and residents.

- 7.4.7. The area is predominantly commercial in character and this will continue through encouragement of office-led commercial development. Existing post-war buildings could be redeveloped or refurbished to provide high quality office space or other commercial activities where these are compatible with the business City. Listed buildings and their key features should be enhanced. There is potential to provide interpretation of the historic development of the area, its relationship with the original site of London Bridge and the significance of the riverside. The priority should be for office use, but there is also potential for complementary commercial and cultural uses compatible with the special interest of heritage assets and to encourage interpretation and public access to historic interiors.
- 7.4.8. Publicly accessible retail, cultural and leisure uses will be encouraged at ground floor level throughout the Pool of London to increase vibrancy and provide active frontages.
- 7.4.9. Redevelopment and refurbishment offer the opportunity to revisit existing servicing **strategies which have been developed on a site by site basis arrangements**. Developers will be encouraged to work with adjoining land owners to deliver shared servicing strategies and to minimise movements onto Lower Thames Street.
- 7.4.10. Despite its significance, the Pool of London is relatively isolated from the rest of the City by Lower Thames Street. **Working with TfL, the City Corporation will seek the improvement of** existing crossing points across Lower Thames Street **will be improved** and **the creation of** new crossing points **created** to encourage greater movement between the riverside and the rest of the City. Where possible, historic routes between the river and other areas of the City will be **introduced or** reinstated through the redevelopment and refurbishment of buildings.
- 7.4.11. The City Corporation will work with **existing** landowners and developers to design and deliver substantial improvements to the public realm along the riverside walk and routes to and along Lower Thames Street, working closely with **TfL Transport for London**. Additional greening and open space will be encouraged, with tree planting in appropriate locations. **Part of the Pool of London lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.**
- 7.4.12. As well as delivering improvements in accessibility, vibrancy and public realm at street level, the City Corporation will encourage the provision of new, publicly accessible roof terraces and viewing areas through building redevelopment or refurbishment, **whilst safeguarding existing protected views**.

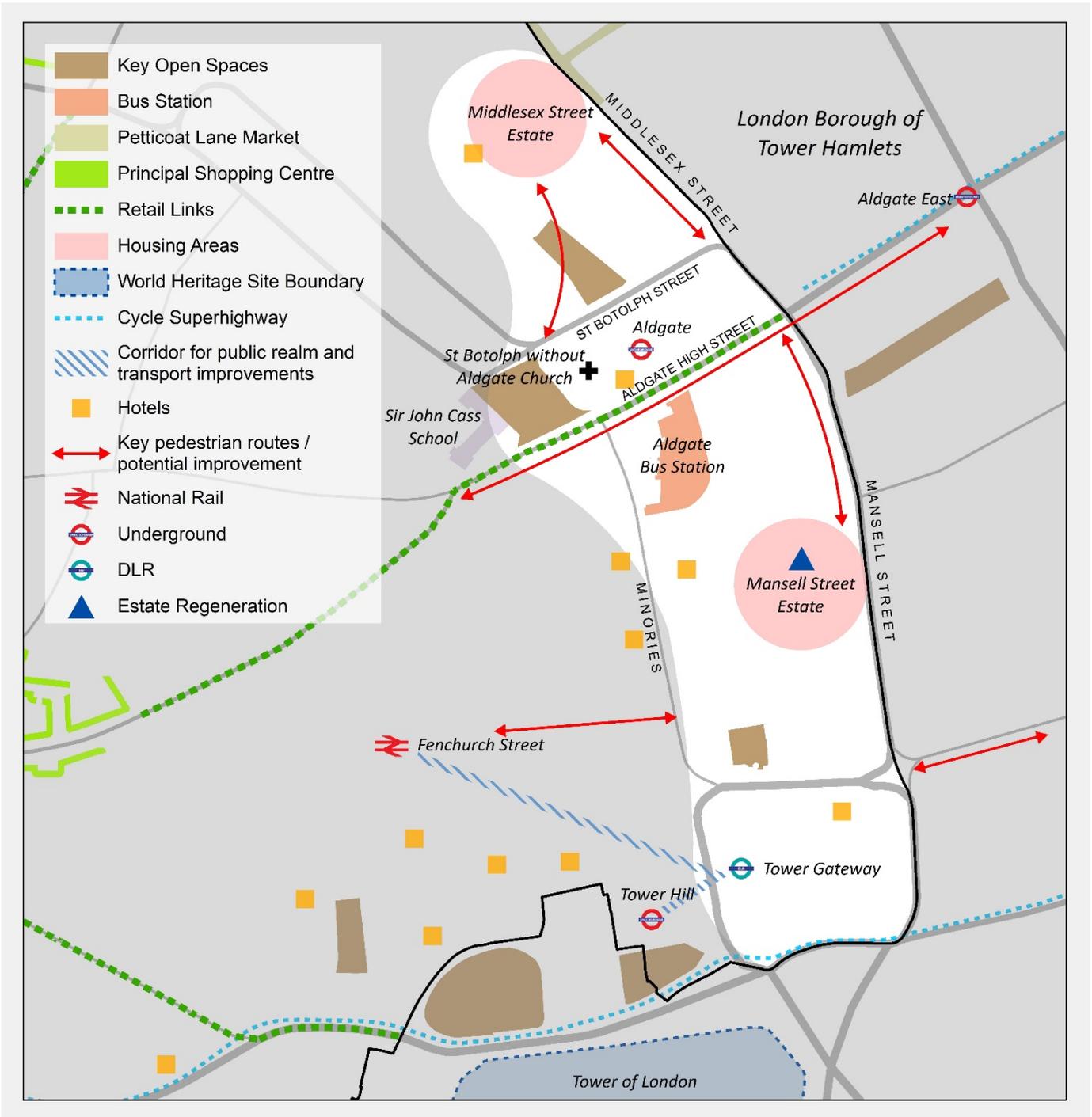


Figure 29: Aldgate & Tower Key Area of Change AMEND TO INCLUDE TOWER HILL IN KAOC AND ADDITIONAL PEDESTRIAN ROUTES NORTH SOUTH. ADD PEDESTRIAN ROUTE FROM FENCHURCH STREET TO LEADENHALL

7.5. Aldgate and Tower Key Area of Change

Context

7.5.1. The Aldgate and Tower area is positioned in the east of the City ~~and, between the City's cluster of tall buildings and London's East End and includes Portsoken, Tower and Aldgate wards.~~ The southern edge of the area is adjacent to the Tower of London.

7.5.2. The area contains a culturally diverse local population and a varied mix of uses, including offices, Sir John Cass Primary School, Mansell and Middlesex Street housing estates, part of Petticoat Lane market and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.

7.5.3. Major hotel and office developments ~~is are~~ under construction on Minories. There are proposals for redevelopment of the Mansell Street Estate and several large office sites currently have development potential. Petticoat Lane Market, a major tourist draw in the area, is undergoing public realm enhancement ~~as well as being rebranded~~. These proposals and opportunities will impact on ~~the use and environment of~~ the area.

7.5.4. The Chinese Embassy will be moving to Royal Mint Court just outside of the City boundary and this may lead to further diplomatic and commercial interest in this area. The Elizabeth Line stations at Liverpool Street in the City and at Whitechapel in Tower Hamlets are both within walking distance of Aldgate; ~~improved pedestrian connectivity should be encouraged to help enable development interest in the area.~~

Strategic Policy S20: Aldgate and Tower

The Aldgate and Tower Key Area of Change will be promoted as a mixed-use area, which balances the competing needs of residents, workers and visitors, by:

1. Promoting office-led commercial development to assist in the further regeneration renewal of the area. Diplomatic use and associated commercial activity will be encouraged.
2. Identifying and meeting residents' needs, utilising a range of funding sources to:
 - maximise training, education and employment opportunities for residents;
 - maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;
 - create additional publicly accessible open and green space and additional accessible play space for children;
 - encourage local retail facilities;
 - facilitate the redevelopment of the Mansell Street Estate re-providing existing social housing ~~and associated car parking~~, alongside additional residential units, improved levels of air and noise pollution, community facilities and good quality open and play spaces.

3. Recognising the benefit and managing the impact of visitors to the area by:

- encouraging cultural events, arts and play in public spaces, working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders to enhance Petticoat Lane Market and improve the visitor experience;
- permitting ~~a limited amount of~~ additional hotels ~~provision~~ on appropriate sites;
- managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.

4. Improving transport connections and pedestrian connectivity by:

- implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;
- improving Aldgate Bus Station to improve air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;
- sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;
- encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate **and between Minories and Mansell Street**;
- improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;
- enhancing links to the riverside walkway and the Tower of London;
- enhancing the north-south walking route between Tower Hill and Aldgate along Vine Street.

5. Enhancing the public realm and open spaces by identifying opportunities for urban greening schemes, congestion and pollution reduction measures, particularly in the vicinity of Sir John Cass School and Middlesex Street and Mansell Street Estates.

Reason for the policy

7.5.5. Until relatively recently, Aldgate was not as attractive for business investment as other parts of the City due to traffic levels, pollution and a lack of street-level activity. The City Corporation and its partners have sought to regenerate Aldgate by stimulating beneficial redevelopment and investing in a programme of environmental and public realm enhancements.

7.5.6. While there have been significant improvements, most notably the removal of the Aldgate gyratory and the creation of Aldgate Square, the Aldgate and Tower area contains major through routes and parts of the area still suffer with associated congestion and poor air quality. The townscape around Tower Gateway is particularly affected by severance issues because of the road and rail networks, and there is currently little to entice visitors going to the Tower of London to explore this part of the City more widely. **Tower Gateway lies within**

the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.

- 7.5.7. Identifying this area as a Key Area of Change will assist in guiding further enhancement of the area during the lifetime of this Plan. There is likely to be further commercial development, especially through the refurbishment or redevelopment of older buildings ~~in the area~~. The area will also experience increased tourism activity, in line with the continued increase in tourist numbers in London as a whole.
- 7.5.8. Residents living on the Mansell and Middlesex Street Estates have lower levels of income, employment and education, skills and training than others in the City. The redevelopment of the Mansell Street Estate ~~is expected to~~ **could** be one of the largest residential schemes in the City during the Plan period and ~~presents a challenge in terms of~~ **requires** the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential environment at high densities and reducing residential exposure to air and noise pollution.
- 7.5.9. Development in the Aldgate and Tower area should enhance ~~its the~~ appearance and vibrancy ~~of the area~~ and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities. **With development occurring small pockets of land may be vacant for long periods. Meanwhile uses for such land, including carefully designed green spaces, can help improve local air quality and be utilised by the local community, visitors and workers for leisure and sporting opportunities. Policies O3 (Temporary Use of vacant offices and sites) and HIC7 (Sport and recreation on temporary sites) support this approach.**
- 7.5.10. Policy ~~S19~~ **S20** will be implemented through the determination of planning applications, the implementation of City Corporation strategies and **public realm** projects and working in partnership with a wide range of organisations.
- 7.5.11. Key partners include the London Borough of Tower Hamlets, which is working with the City Corporation to rejuvenate Petticoat Lane Market; TfL, which manages Aldgate Bus Station, Aldgate and Tower Hill Underground Stations and Tower Gateway DLR Station; The Aldgate Partnership, which represents businesses and other stakeholders and is ~~seeking to establish~~ **progressing** a cross-boundary Business Improvement District (BID); and Historic Royal Palaces, which manages the Tower of London World Heritage Site.

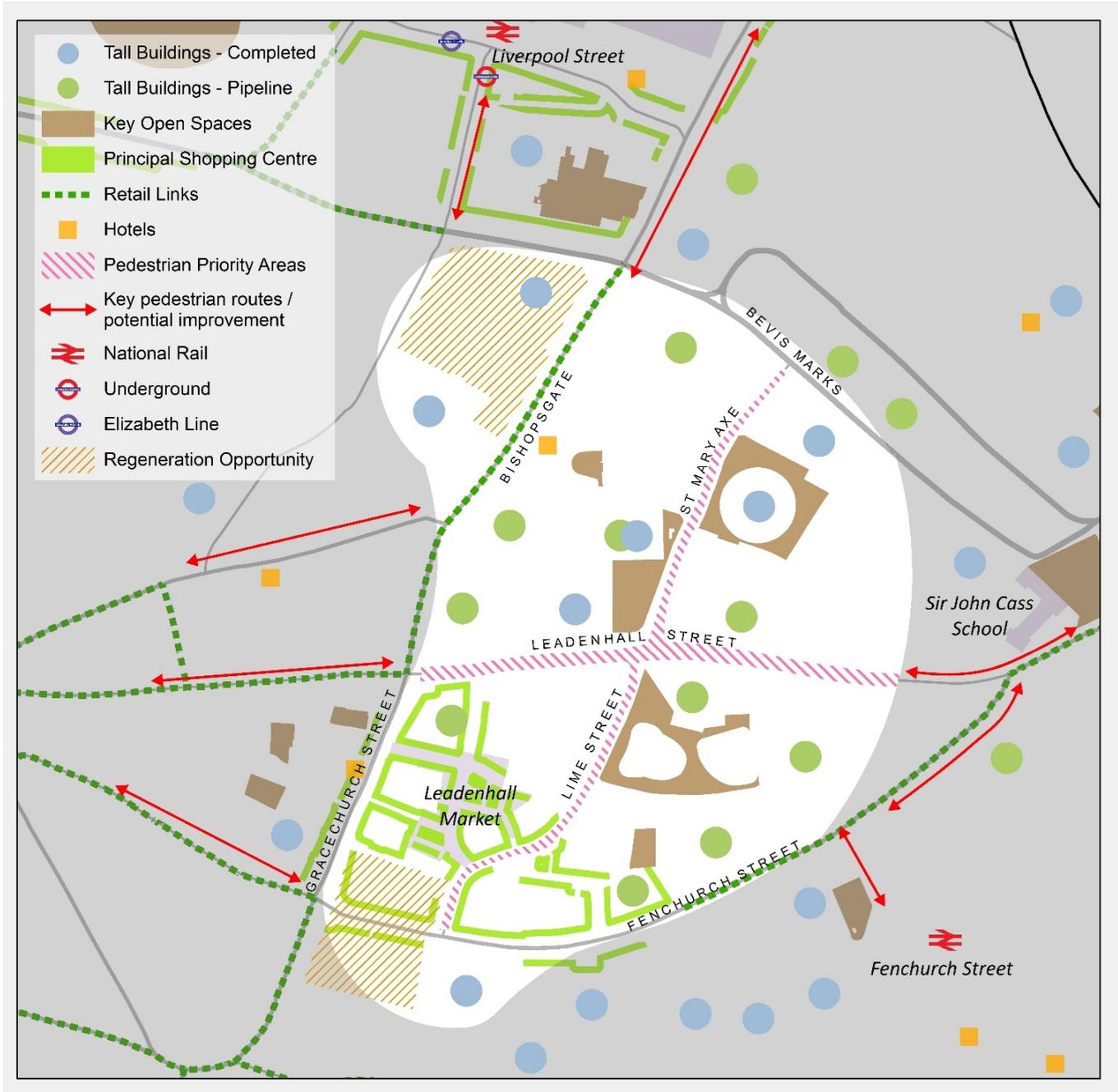


Figure 30: City Cluster Key Area of Change AMEND – CHANGE REGENERATION OPPORTUNITY TO RENEWAL OPPORTUNITY; SHOW LINKS SOUTH ALONG GRACECHURCH STREET AND SHOW LIVERPOOL STREET KAOC FOR CONTEXT

7.6. City Cluster Key Area of Change

Context

- 7.6.1. The east of the City **contains a cluster of tall buildings which form part of a distinctive skyline** and has the highest density of business activity in the City. ~~containing a cluster of tall buildings which form part of a distinctive skyline.~~ It ~~contains a concentration~~ **comprises an agglomeration** of offices in banking and insurance use and increasingly a wider range of technology, legal and business services. Protected views considerations allow for the construction of tall buildings on appropriate sites in the Cluster area. Recognisable and iconic tall buildings, including the Gherkin and the Leadenhall Building, have been constructed over the past 15 years and a number of significant tall buildings are under construction. ~~There are f~~urther tall buildings ~~that~~ have been permitted but not yet commenced. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.
- 7.6.2. Projected employment growth will lead to a significant increase in footfall on streets that are already crowded at peak times. **The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line will bring increased pedestrian movement into the Cluster, with Bishopsgate a key pedestrian route into and through the area.** This concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation.
- 7.6.3. The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including Leadenhall Market which provides a key retail use in the heart of the Cluster and a valuable contrast to the modern development that surrounds it. The St Helen's Place Conservation Area contains the churchyards of St Helen and St Ethelburga, providing open space and respite for workers. The Cluster also forms the focus of the annual Sculpture in the City exhibition and attracts visitors to its contemporary and historic architecture.

Strategic Policy S21: City Cluster

The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements, by;

1. Increasing the provision of world class buildings that are sustainable and offer a range of office **floorspace** accommodation to cater for the needs of varied office occupiers;
2. Delivering tall buildings on appropriate sites, including **Regeneration on Renewal Opportunity Sites**. These should make a positive contribution to the City's skyline, **conserving** preserving heritage assets **and settings**, taking account of the effect on the **wider** London skyline and **on** protected views;
3. Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
4. Enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and prioritising pedestrian movement during the daytime in key streets such as St Mary Axe, Leadenhall Street and Lime Street;
5. **Delivering a high-quality public realm, maintaining the quality of the microclimate and increasing urban greening;**
6. Ensuring the provision of high-quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
7. Introducing new approaches to freight, **construction logistics** and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth;
8. Improving access to retail, leisure, cultural, health and educational facilities and services by encouraging a range of complementary land uses, ensuring active frontages at ground level and supporting activities such as 'Sculpture in the City'.

Reason for the policy

7.6.4. The City Cluster has been identified as the area within the City that is most suitable for tall buildings **on because of the opportunity sites which are less constrained by view protection policies than elsewhere and relative lack of constraints**. The spatial extent of the Cluster **and the Renewal Opportunity Sites** has been informed by technical work undertaken to develop the City's 3D **digital** modelling, which shows that there is scope for further tall buildings, although not every site within the Cluster will be suitable. Market demand for new office space in this area has remained high and a large proportion of the office development pipeline is within the City Cluster. The resulting increase in floorspace and employment will inevitably put more pressure on public transport, streets, open spaces and services.

- 7.6.5. Office development within the City Cluster will be expected to deliver flexible floorspace to meet the needs of a range of occupiers and ensure the City's stock is resilient and ready to respond to changes in the market. While all forms of development should be of high-quality design, tall buildings by their nature have an impact on the wider London skyline. ~~and it~~ is important that they enhance the overall appearance of the Cluster on the skyline while also having a successful relationship with the space around them at ground level ~~and with particular regard to the Tower of London World Heritage Site upper parts of the White Tower~~. The ~~Regeneration-Renewal~~ Opportunity ~~s~~Sites have potential to accommodate an uplift in floorspace in new ~~tall~~ buildings of an appropriate design and height. The City Corporation will continue to use 3D modelling of the Cluster to ~~better~~ understand opportunities for redevelopment.
- 7.6.6. The intensification of ~~tall buildings development~~ will have cumulative environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of public open space around the building, to ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.
- 7.6.7. The City Corporation is working with businesses and stakeholders to address the challenges facing the City Cluster. During the Plan period improvements to key streets and spaces will create a better connected and more interesting rewarding pedestrian experience. Proposals include timed or permanent closures of certain streets to create a pedestrian priority core, wider pavements and improved crossings, which would enable consequential public realm improvements such as more greenery and space for cultural and seasonal events. The ~~Eastern City Cluster Area Enhancement Strategy~~ City Corporation's City Cluster Vision provides further details about these proposals, including an indication of potential design proposals.
- 7.6.8. Area-wide security measures will be implemented, including the Anti-Terrorism Traffic Regulation Order, to reduce the risks associated with high-profile buildings and increasingly crowded streets. Developers will be required to contribute towards the design and implementation of area-wide security through s106 planning obligations proportionate to the scale of the development. Area-wide approaches to servicing and deliveries will ~~also~~ be promoted, for instance the use of physical and/or virtual consolidation measures.
- 7.6.9. Active frontages and complementary land uses will be encouraged to enhance vibrancy and viability, extending to weekends to diversify the City, its economy and community.

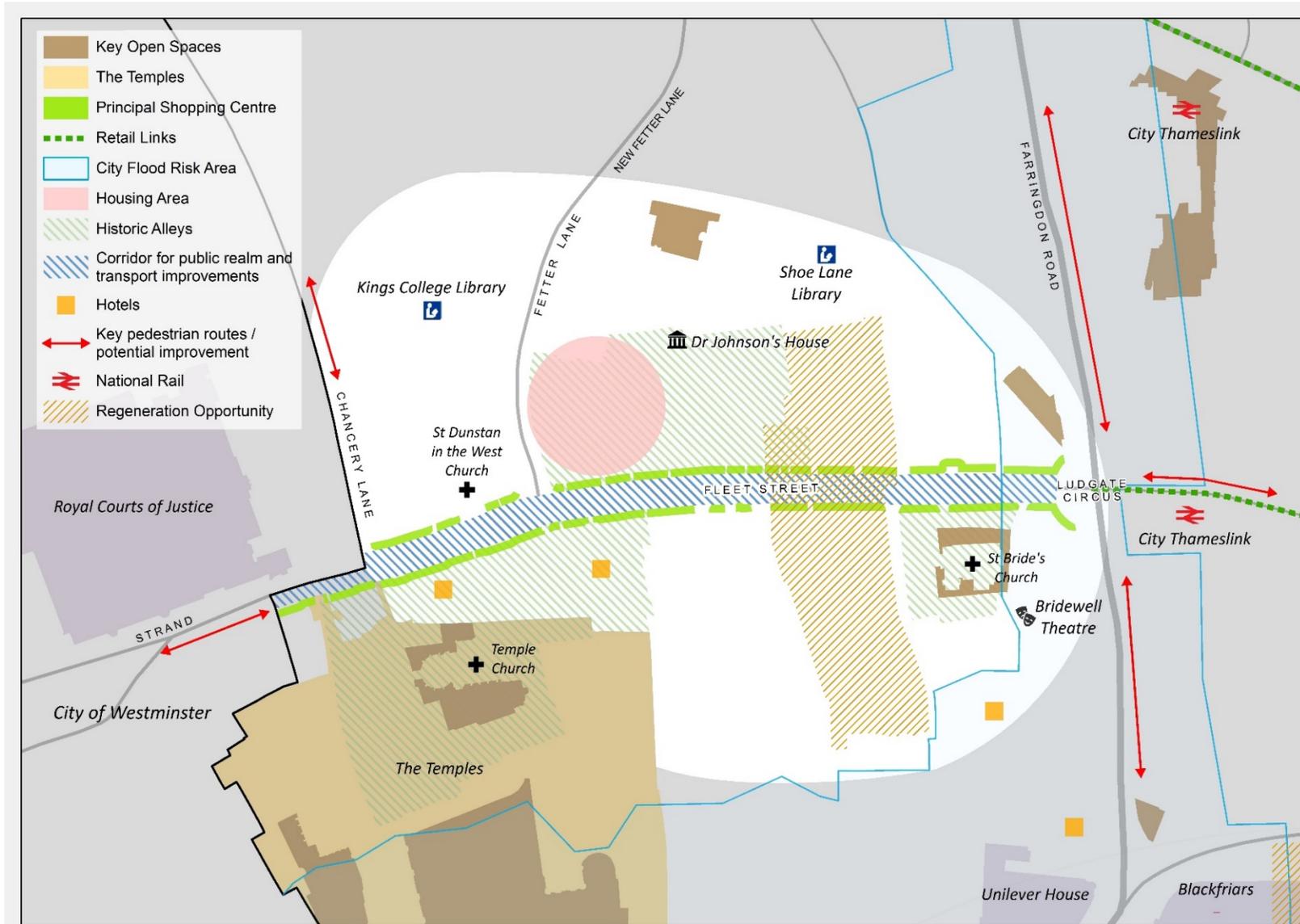


Figure 31: Fleet Street Key Area of Change AMEND DIAGRAM - CHANGE REGENERATION OPPORTUNITY TO RENEWAL OPPORTUNITY; EXTEND KAOC TO ST PAUL'S CHIRCHYARD

7.7. Fleet Street and Ludgate Key Area of Change

Context

7.7.1. The Fleet Street area is the former home of the press but has changed in character as the newspaper and publishing industries moved away. The western extent of the area comprises the legal precincts of the Inner and Middle Temples and adjoins the Royal Courts of Justice in the City of Westminster. Fleet Street is a Principal Shopping Centre (PSC) with retail frontage along its extent, although most units are small and cater principally for the lunchtime market. The street forms the spine of the Fleet Street Conservation Area and has numerous listed buildings.

7.7.2. **The St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the Cathedral.** Protecting and enhancing this heritage **and views of St Paul's Cathedral** will be a key consideration guiding future change. Fleet Street, **Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London and are is part of the processional route through the City from Westminster, and provides providing** iconic views of St Paul's Cathedral. Fleet Street, **Ludgate Circus and Ludgate Hill are is** heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.

7.7.3. Significant occupational change **presents in major buildings is expected in the short to medium term as existing occupiers relocate to other buildings.** **There is** an opportunity to promote **regeneration renewal** of the area through appropriate development or refurbishment of key buildings providing links both north and south of Fleet Street to Holborn and the River Thames. The City Corporation, in partnership with the Ministry of Justice, is developing proposals for a new court building and police facilities in the area which will complement the legal cluster and stimulate further investment in this area.

7.7.4. **Junction improvements at Ludgate Circus will deliver a safer pedestrian and cycling environment. Recent major development on Ludgate Hill, together with new hotel provision, has enhanced the retail offer and the quality of commercial and visitor accommodation.**

Strategic Policy S22: Fleet Street and Ludgate

The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a key processional route and a Principal Shopping Centre will be promoted by:

1. **Protecting and enhancing the view of St Paul's and the character and appearance of the processional route.**
2. Development of new court facilities and City of London Police station, having regard to the impact of the development **on the Fleet Street Conservation Area and heritage assets** and **the need to ensure security of the buildings for court and police use.** ~~associated security considerations on:~~
 - ~~the need to protect and enhance the Fleet Street Conservation Area and heritage assets;~~
 - ~~the need to retain retail provision within the Fleet Street Principal Shopping Centre;~~
 - ~~the need to ensure security of buildings for police and court use.~~
2. Continued protection of existing office use in the area, whilst encouraging the provision of flexible spaces and complementary uses in appropriate locations.
3. Directing further residential development to appropriate sites off principal streets to reinforce ~~the~~ existing residential clusters, ensuring a high quality of residential amenity.
4. **Retaining retail provision within the Fleet Street Principal Shopping Centre and Retail Link and** Encouraging extension of retail activity ~~within the Principal Shopping Centre~~ into the evening and weekends, whilst retaining a focus on A1 uses.
5. Enhancing the public realm and open spaces by:
 - improving and increasing the capacity **and accessibility** of pavements along Fleet Street **and Ludgate Hill and junction improvements at Ludgate Circus;**
 - enhancing the courts and alleyways that lead off Fleet Street **and Ludgate Hill** and churchyards that are located in the area;
 - delivering additional greening on streets and open spaces and encouraging the greening of buildings, where ~~this is~~ compatible with heritage considerations.

Reason for the policy

7.7.5. Fleet Street is an iconic location with a name synonymous with the UK newspaper and publishing industry. However, the newspapers that occupied Fleet Street have moved out to be replaced with commercial office occupiers. The area is an established legal cluster ~~in the City~~, focused on the Temples **in the City** and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster.

- 7.7.6. The City Corporation in partnership with the Ministry of Justice has proposed a new flagship court facility for London to tackle cybercrime, fraud and economic crime. The proposed new court and police station will need to be consistent with the requirement to protect and enhance heritage assets in the Fleet Street **Conservation Area** and the protection of retail uses within the Fleet Street PSC, whilst addressing the need for security and secure access.
- 7.7.7. The Fleet Street area has a strong cultural offer with attractions ranging from Dr Johnson's House to the St Bride's Institute, the Bridewell Theatre and the historic churches of St Brides, **St Dunston's in the West** and Temple Church. These attractions help draw visitors to the area, which support the PSC.
- 7.7.8. **Ludgate Circus is a major junction between Fleet Street, Ludgate Hill and Farringdon Street. The western side lies within the Fleet Street PSC, whilst the eastern side is within an identified Retail Link. Ludgate Hill forms the principal approach to St Paul's Cathedral and a key element of the processional route. Major commercial development at Old Bailey has enhanced the office and retail offer on this street and further hotel development will support the City's growing visitor economy.**
- 7.7.9. The **Fleet Street area Key Area of Change** contains a mix of large modern office developments and smaller scale historic buildings **on small plots** more suitable for SME use. ~~Over the short to medium term, several major office occupiers are expected to relocate to other sites in the City. A number of major occupiers have vacated office buildings on Fleet Street in recent years.~~ The City-wide presumption in favour of protecting office uses will continue to apply **and the area's commercial office focus will remain.**, but ~~Heritage and views constraints may limit opportunities for redevelopment of larger sites significant increases in floorspace. Consequently,~~ there may be potential **partnership working between occupiers in the area to deliver improvements and scope** for more flexible use of some buildings whilst retaining a predominance of commercial use, allowing uses which complement the City's business focus.
- 7.7.10. The area contains an existing residential cluster to the north of Fleet Street, with a number of upper floors of buildings on Fleet Street itself converted to residential in recent years. **South of Ludgate Hill is the established residential area of Carter Lane. However,** Fleet Street **and Ludgate Hill** suffers from noise from commercial and retail activities, traffic and poor air quality. To ensure a high quality of residential amenity, new residential development in this area will be directed to sites away from principal streets, where the potential for noise disturbance and exposure to poor air quality can be minimised.
- 7.7.11. The PSC is an important aspect of Fleet Street that provides vibrancy along its length. To strengthen the PSC, it should continue to focus on A1 uses, but also look to extend its retail offer into the evenings and weekends. **The Retail Link on Ludgate Hill provides a key route between the Fleet Street and Cheapside PSCs and further retail development is appropriate along this route.**
- 7.7.12. ~~Fleet Street~~ **The key streets within the area** offers a poor public realm, ~~as it is being~~ heavily trafficked ~~and has with~~ narrow footways that are congested

particularly during peak hours and lunch times. There is limited greenery along Fleet Street, **Ludgate Circus and Ludgate Hill. Additional planting will need to consider the impact on key views of St Paul's Cathedral along the processional route.** There is scope to enhance the public realm and achieve a better balance between motor vehicles and pedestrians, **including through the widening of pavements.** Improvements to the public realm will deliver benefits to the area as well as improve air quality and provide more quiet areas in the network of courts and alleyways behind Fleet Street **and Ludgate Hill.** St Brides Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement.

- 7.7.13. **The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960's. The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and de-cluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral.**

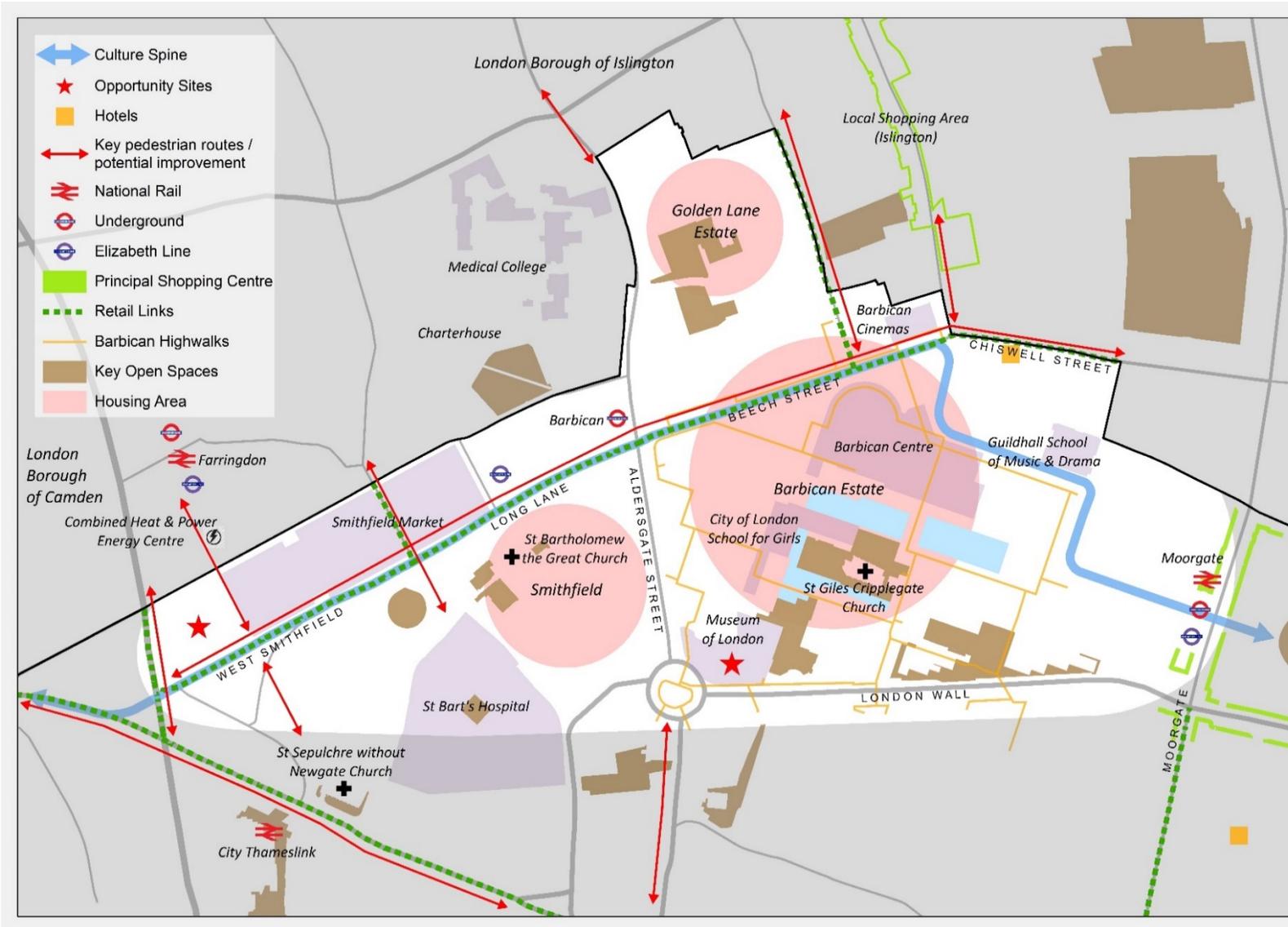


Figure 32: Smithfield and Barbican Key Area of Change AMEND TO ALIGN WITH CULTURE MILE AREA

7.8. Smithfield and Barbican Key Area of Change

Context

7.8.1. The Smithfield and Barbican Key Area of Change is a vibrant, **mixed use**, area that contains:

- the highest concentration of residential units in the City, including the Barbican and Golden Lane estates (~~39%~~) and Smithfield (principally Bart's Square);
 - a cultural quarter, known as Culture Mile, focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic cultural area;
 - St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre.
 - Smithfield Market, ~~a major~~ London's major wholesale meat market.
 - **A mixed office market, ranging from large corporate headquarters to buildings suitable for SMEs, creative enterprises and start-ups.**
 - many heritage assets including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, gardens and spaces **which provide it with its special character.**

7.8.2. This part of the City will undergo significant change and development over the life of the Local Plan with the delivery of the Culture Mile initiative, including **the proposed** relocation of the Museum of London to Smithfield and the potential development of a new Centre for Music on the site of the existing Museum of London (**subject to further investigation**).

7.8.3. It is possible that Smithfield Meat Market **will may** move from its current location in this period and alternative uses **will would then** need to be found for the historic market buildings.

7.8.4. **In 2019, the opening of** the Elizabeth Line **will open**, with a station entrance at Lindsey Street and another on Moorgate, **will significantly increasing increase** public transport provision to the area and **resulting** in increased pedestrian flows to and from these stations, Culture Mile and the rest of the City.

Strategic Policy S23: Smithfield and Barbican Key Area of Change

The City Corporation will improve the Smithfield and Barbican area by:

- implementing the Culture Mile initiative, including delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy.
- ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst **preserving seeking to preserve** privacy, security and noise abatement for residents and businesses;
- **encouraging appropriate alternative uses for market buildings in Smithfield and the Museum of London site if the existing uses are relocated;**
- identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;
- **making** improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;
- seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;
- requiring improvements to pedestrian and cycle routes, **including for disabled people, for all** within and through the north of the City; and
- supporting continued connections to the Citigen **district combined cooling, heating and power** cooling network and ensuring that, where feasible, all new development is designed to enable connection to the **CCHP** Citigen network.
- **enhancing the special character of the area through sensitive change.**

Reason for the policy

7.8.5. The Smithfield and Barbican area contains a very diverse range of uses, including commercial offices, retail, market, cultural, hospital and residential, which attract large numbers of people to the area. During the life of this Plan, **the proposed** relocation of the Museum of London from **its current site on London Wall to Smithfield would release its current site for the** potential development of a Centre for Music **on the Museum of London's current site, possible relocation of Smithfield Market and implementation of a range of cultural and artistic activities and buildings through Culture Mile,** **The City Corporation is exploring the possible consolidation of its 3 wholesale markets to a new location which could release the existing Smithfield Market buildings for alternative use. The Culture Mile initiative will see a range of cultural and artistic activities implemented throughout the area. Together these changes** will **see deliver** a substantial increase in visitor numbers to this part of the City and enhance the area's attractiveness for businesses, residents and visitors. The opening of the Elizabeth Line **in 2019,** linking to national rail and tube lines, **will make** this area one of the most

accessible locations by public transport in the country, again resulting in increased pedestrian flows.

- 7.8.6. **Delivery of** this policy will ~~enable the maintenance and improvement of the public realm be supported by implementation of public realm enhancement and transportation schemes and greater activation of streets, providing~~ improved amenity, design and movement, for the benefit of workers, residents and visitors, ~~to maintain a pleasant environment and manage the large volumes of people and activities. The design of new buildings and spaces would provide greater pedestrian permeability, ensuring that the area is able to accommodate and manage increased volumes of people and activities. Due to the high level of residential use in this area and the hospital, improving~~ **A particular concern in this area is the need to improve** air quality **is important** to protect the health of the **large** resident **population** and **hospital** patients. **The City Corporation's Transport Strategy proposes to introduce a local Zero Emission Zone covering Barbican and Golden Lane by 2022. An interim 2 way Zero Emission Street will be implemented at Beech Street in 2020 under an Experimental Traffic Order.**

Culture Mile

- 7.8.7. Culture Mile is a unique collection of arts, cultural and educational organisations and creative enterprises in the north of the City which has been created through a partnership of the City of London Corporation, the Barbican Arts Centre, Guildhall School of Music and Drama, the London Symphony Orchestra and the Museum of London. Culture Mile runs from Farringdon to Moorgate on the east-west axis and from ~~St Luke's London Symphony Orchestra Centre~~ **the Golden Lane estate** to ~~St Paul's Cathedral~~ **south of London Wall** on its north-south axis. The Culture Mile area has been identified as a Strategic Cultural Area in the London Plan.

Strategic Policy S24: Culture Mile Implementation

The City Corporation will promote and protect Culture Mile as the City's main cultural centre and world class cultural destination, by encouraging and supporting:

- the **proposed** relocation of the Museum of London to Smithfield;
- the potential development of a new Centre for Music on the current site of the Museum of London on London Wall;
- shared working with the London Borough of Islington to ensure the change and development around Culture Mile benefits local communities through improved access to **and experience of** cultural enrichment, education, skills and employment opportunities;
- provision of cultural facilities and uses within buildings and the public realm, where appropriate, and where the amenity of surrounding uses is not significantly compromised;
- supporting the provision of additional **retail**, hotel and leisure uses in appropriate locations, **where they are complementary to the City's business**

role, and a diverse retail, food and beverage offer, particularly along the Culture Spine key route:

- encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries **and cultural organisations and artists**;
- strengthening of routes, way finding, lighting and signage throughout the area and the links with the rest of the City in a co-ordinated manner; **and**
- public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile and which provide a **specific relevant** identity for Culture Mile; **and**
- **Safeguarding cultural uses such as churches and museums.**

Reason for the policy

7.8.8. Culture Mile has been identified to guide cultural and creative activity within this part of the City, including potential development in the area during the life of the Plan. It will build on and promote the wealth of the City's cultural attractions to a wider audience. The opening of Elizabeth Line stations will **stimulate further change in contribute to the development of** the area.

7.8.9. An important element of the emerging proposals for Culture Mile is the identification of movement spines, including a key route from the proposed Museum of London site, along Long Lane and Beech Street. Significant improvements to the public realm and traffic reduction measures, particularly along Beech Street, will be progressed to support increased pedestrian flows and the provision of cultural activity on street. Public realm improvements will be sought as development opportunities arise. **Expansion of the area's cultural offer, including within established institutions, will require the provision of appropriate transport infrastructure into and through the area.**

7.8.10. To deliver its ambitions for Culture Mile, the City Corporation is aiming to create a distinctive look and feel **to unify for** the area, which allows for the provision of art installations and activity in the public realm **and addresses the requirements for advertising and event promotion. Further planning guidance will be provided.**

7.8.11. The City Corporation and partners have **commissioned research to consider published research that highlights** the contribution made by creative industries in and around Culture Mile to the City's economy and the potential for growth of this sector as part of the Culture Mile initiative. **The research identified the significant social and economic value that can be derived from the growth of creative enterprises and made four key recommendations which are addressed in part through this policy:**

- **Create a strong sense of place;**
- **Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space;**
- **Attract talent, create new jobs and support social mobility; and**

- Drive inward investment.

Policy SB1: Culture Mile Impacts

The City Corporation will protect the amenity of residents, workers and occupiers, ~~the integrity of historic and listed buildings and structures, and the flow of traffic and access to premises for service vehicles affected by Culture Mile~~ and conserve and enhance the character of designated and non-designated heritage assets by:

- considering the impact of noise-generating uses, particularly night-time activities on residents and business occupiers when granting planning permissions;
- requiring the installation of noise mitigation measures in developments and spaces to minimise disruption where appropriate;
- managing the highway network to minimise traffic disturbance and to maintain access to existing premises for essential servicing;
- requiring development and cultural activities to preserve conserve and enhance ~~the existing historic integrity of~~ historic buildings and their settings, historic structures and spaces and conservation areas;
- allowing suitable architectural lighting of buildings and spaces, consistent with their architectural, cultural and heritage status, the amenity of occupiers and the requirements of Culture Mile; ~~and~~
- ensuring public realm and open space improvements, and temporary and pop-up stalls and events do not impede the efficient flow of people and essential vehicles or detrimentally impact on the conservation area.

Reason for the policy

7.8.12. Culture Mile will be a vibrant place with large numbers of people and significant activity during the day and night into the evening. This level of activity will impact on residents and workers as well as the movement of people and traffic and therefore mitigation measures need to be considered alongside project implementation.

7.8.13. Islington Council has designated the Clerkenwell and Farringdon area as a cultural quarter and proposes an intensification of retail, food, drink and entertainment premises from Smithfield Market to Farringdon Station along Cowcross Street. While these proposals will complement the Culture Mile, mitigation measures may be required to manage the impacts of Culture Mile development and activities on land uses on the border with Islington.

7.8.14. Policy S9 (Vehicular Transport and Servicing) addresses disturbance from vehicle movements as well as disruption to servicing arrangements. Policies HIC3 (Noise and Light Pollution) and C4 (Evening and Night Time Economy) outline measures to help protect residents from noise and light disturbance and the night-time economy. Further guidance is provided in

the City Corporation's Noise Strategy, Lighting Strategy and Statement of Licencing Policy.

Smithfield

7.8.15. The Smithfield area has over centuries developed a distinctive mixed-use character and townscape and contains the designated Smithfield Conservation Area **and numerous important listed buildings**. It is characterised by the wholesale Smithfield Meat Market, the General Market and St Bartholomew's Hospital complex. The hospital is a leading internationally renowned teaching hospital and centre for excellence which includes specialist cardiac and heart centres. The Smithfield area also supports a range of other land uses, including residential, office, retail, leisure, **churches** and night-time entertainment. ~~**The Smithfield market buildings are an important historic asset that will be enhanced by the Museum of London moving into the General Market building on Farringdon Street. There is also a possibility that The City Corporation has taken a decision in principle to consolidate its three wholesale markets onto a single site and it is possible that**~~ Smithfield Meat Market will relocate to **a this** consolidated wholesale market site **along with Billingsgate and new Spitalfields Markets** during the Plan period. ~~**Part of the Culture Mile area,**~~ Smithfield is home to a significant number of cultural organisations and creative enterprises **with links to Camden and Islington**.

Strategic Policy S25: Smithfield

The City Corporation will protect and enhance the distinctive mixed-use and historic character of Smithfield by:

- supporting the continued presence of St. Bartholomew's Hospital;
- supporting the continued presence of Smithfield Meat Market in the short to medium term **and ensuring that any future re-use of the market buildings maintains and enhances their heritage value;**
- **encouraging the future sensitive re-use of the Wholesale Meat Market buildings, should the market relocate, requiring a world class design solution which delivers a mix of uses appropriate to its sensitive heritage character;**
- **supporting the proposed relocation of the Museum of London to Smithfield;**
- further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses;
- **recognising managing** the particular challenges which will result from the **24-hour late evening,** 7 day a week character of the area;
- ensuring new activities and developments **do contribute to a reduction in freight and vehicular movements whilst** not adversely **affect traffic movement,** impacting the operation of businesses and amenity of residents; and

- providing for, and supporting, improved pedestrian permeability and **the creation of new and enhanced** public realm **enhancements** across the area to accommodate **cultural activity and** increased pedestrian flows arising from the Elizabeth Line and **the Museum of London relocation** **potential new uses in the existing market buildings**.

Reason for the policy

7.8.16. The **proposed** relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line ~~in 2019~~ and development of Culture Mile activities, will result in a significant increase in pedestrian and visitor numbers which will place further pressure on the public realm. Improvements to the public realm will be required to ensure that increased movement can be accommodated. At the same time, it is important that new activities do not adversely affect the amenity of existing business and residents, the continued operation of St Bartholomew's Hospital or impact on the area's historic **significance** and mixed-use character.

7.8.17. The City Corporation has carried out a strategic review of its 3 wholesale markets, Smithfield, Billingsgate and New Spitalfields. A decision has been taken in principle, subject to feasibility and consultation, to consolidate the wholesale markets onto a single site. ~~Consultants were appointed in July 2018 to manage the process of identifying a suitable site.~~ As a result, it is possible that Smithfield Meat Market **will may** move from its current location **in the City** at some time in the latter part of the Plan period. The Local Plan therefore continues to protect the ~~existing location and~~ operation of the Market in its current location, but also ~~makes provision for possible future movement of the Market and~~ provides guidance **on requiring** future potential uses of the market buildings **which to enhance their historic interest maintain the historic character of the existing Grade II* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile and is fully inclusive whilst protecting local amenity. If the decision in principle to consolidate the wholesale markets is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Meat Market buildings.**

7.8.18. ~~The existing public car park at Smithfield Rotunda is likely to become a more intensively used facility in future having regard to the Culture Mile proposals and the anticipated increase in complementary retail and leisure uses.~~



Figure 33: Liverpool Street Key Area of Change AMEND ADD ARROW NORTH ON ELDON STREET; REMOVE GAP ON WORMWOOD STREET; REMOVE BISHOPSGATE INSTI

7.9. Liverpool Street Key Area of Change

Context

- 7.9.1. The Liverpool Street area stretches from the City ~~boundary border~~ with Shoreditch to the north east, to ~~the Barbican and Culture Mile~~ Finsbury Circus to the west and the City Cluster to the south. It provides a key route from Liverpool Street Station to the Barbican and Culture Mile. It is an area that will experience extensive change with the opening of the Elizabeth Line ~~in 2019~~ and the completion of significant new office floorspace and retail and leisure facilities which are currently under construction or progressing through the planning process.
- 7.9.2. Liverpool Street is the gateway to the City for ~~the~~ East Anglia – as well as being a multi-line tube station. The Elizabeth Line will provide fast, easy access from the west including the West End, Heathrow and beyond, linked to Moorgate station which already serves stations to the north of London. The increase in passengers and pedestrians in this area facilitated by the Elizabeth Line brings challenges and opportunities: challenges in terms of additional people on already heavily used streets; opportunities in terms of increased accessibility for businesses and greater demand for the growing retail and leisure sector.
- 7.9.3. The area ~~provides as is~~ a gateway to ‘Tech City’ focussed on Old Street, Shoreditch and Spitalfields, and there are further opportunities to develop tech-related activity in the City and its fringes. Facilitating office space suitable for such businesses - affordable, collaborative, and available for short periods ~~of time~~ – will enhance the local business office eco-system and strengthen the City’s reputation as a centre for incubators, start-ups and the tech industry and Fintech sectors. Links could be further developed between the creativity of the Culture Mile and Tech City, enhancing the creative eco-system.

Strategic Policy S26: Liverpool Street

The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by good public transport accessibility, the opening of the Elizabeth Line and restoration of Finsbury Circus and the redevelopment and refurbishment of ~~the~~ Broadgate ~~Estate~~ by:

- accommodating the increased footfall by maintaining and enhancing walking routes within, to and from the area and improving wayfinding ~~and by maintaining and enhancing links to the Highwalk network;~~
- providing active frontages and clear signposting that reflects the area's position as a gateway to the Culture Mile;
- encouraging the development of flexible and collaborative office space to meet the needs of potential start-ups, businesses growth and the development of the tech and fintech eco-system. ~~Collaboration between creative industries in Culture Mile and emerging tech industries will be promoted;~~
- facilitating linkages between business, the creative sector and educational institutions;
- supporting additional retail provision in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends, while managing the potential impacts associated with the night-time economy;
- enhancing the environment public realm and walking of, ~~and~~ routes to Petticoat Lane Market, working in partnership with the London Borough of Tower Hamlets, and links to Whitecross Street and Spitalfields markets; ~~and~~
- delivering a high-quality public realm, increasing urban greening and seeking new green open space; and
- improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including Culture Mile, Tech City and the City Cluster.

Reason for the policy

7.9.4. The Liverpool Street area is undergoing significant transformation through redevelopment and refurbishment of ~~the~~ Broadgate ~~Estate~~, provision of more retail floorspace and improvements in and surrounding streets, the opening of the Elizabeth Line ~~in 2019~~, and significant intensification in the City Cluster to the south. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, ~~thereby~~ enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. ~~The~~ Broadgate ~~Estate~~ is currently developing a more 'outward looking' character and this is expected to continue, alongside further improvements to permeability.

7.9.5. Where suitable funding is available, the City Corporation will support such change through **delivery of world class** public realm and improvement to streets and pedestrian routes, **including additional pedestrian priority and new pedestrian routes to maximise permeability, where appropriate**. The ~~draft~~ Transport Strategy indicates that the area around Moorgate and Liverpool Street stations will be prioritised for improvements, together with the routes between these stations and key destinations such as Culture Mile and the City Cluster. **Where feasible, additional urban greening and the creation of green urban spaces will be encouraged.**

7.9.6. Alongside these changes, encouragement will be given to the provision of space suitable for **incubators**, start-ups, technology-based companies and creative industries, including the provision of flexible accommodation suitable for these sectors and growing businesses. This will reinforce established links between the area and the Old Street/Shoreditch/Spitalfields 'Tech City' and will exploit the opportunities presented by Culture Mile to enhance the creative ecology of this part of the City. **Collaboration between creative industries in Culture Mile and emerging tech industries will be encouraged.**

8. Implementation

8.1. Planning Contributions

Context

Community Infrastructure Levy (CIL)

8.1.1. The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) set out the legislative and regulatory basis for the CIL. They provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the Local Plan. CIL is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

Planning Obligations

8.1.2. CIL Regulations indicate that planning obligations may only constitute a reason for granting permission if the planning obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

8.1.3. Planning obligations are legal agreements linked to planning permissions that regulate the way a development is undertaken, and they are used where it is not possible to regulate the permission by means of a condition. They may be in the form of in-kind benefits or a financial contribution and may be used to prescribe the nature of a development, compensate for loss or damage created by a development, or mitigate the impacts associated with the development. The level of any obligation is subject to consideration of its impact on the viability of the development proposed.

Strategic Policy S27: Planning Contributions

The City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development:

1. Requiring contributions through the Community Infrastructure Levy to:
 - assist in the delivery of the infrastructure necessary to support implementation of the Local Plan and the City's Transport Strategy;
 - **contribute towards the costs of Crossrail, or other strategic infrastructure, in accordance with the provisions of the Mayor of London Community Infrastructure Levy 2.**
2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
 - site specific mitigation meeting statutory tests;
 - affordable housing;
 - training, skills and job brokerage;
 - carbon offsetting;
 - local procurement in the City and neighbouring boroughs.
- ~~3. Requiring qualifying development to make an additional contribution to meeting the costs of Crossrail or other strategic infrastructure in accordance with the provisions of the London Plan.~~
4. Use of the Vacant Building Credit is not considered to be appropriate in the City of London

Reason for the policy

8.1.4. The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL) to help local infrastructure keep pace with the demands of development and attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to ensure proposals are acceptable.

How the policy works

8.1.5. The City Corporation has adopted a CIL Charging Schedule and **a Regulation 123 List which sets will prepare an Infrastructure Funding Statement setting** out the types of infrastructure or infrastructure projects that may be funded in part or in whole by CIL.

8.1.6. In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security measures

in the City Cluster, in line with the policies set out in this Plan. Planning obligations will also be negotiated to deliver affordable housing, the provision of training and skills programmes and carbon offsetting. Specific requirements are set out in other policies within this Plan, particularly Policies S1, S3 and D1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

- 8.1.7. Where required, the City Corporation will ~~also~~ seek, via s106 planning obligations, ~~to negotiate~~ Section 278 Agreements with developers to ensure that highway works necessary to make a development acceptable ~~in principle~~ are funded by the developer and implemented by the highway authority.
- 8.1.8. Further detail on **required** planning obligations is set out in the Planning Obligations Supplementary Planning Document and in the s106 Standard Template which is published on the City Corporation's website.
- 8.1.9. The Vacant Building Credit is set out in national planning policy and is intended to provide an incentive to bring forward brownfield sites for development. The high cost of land in the City of London, together with high levels of demand for commercial and residential development, mean that additional incentives are not required to encourage brownfield sites to come forward for development. The use of Vacant Building Credit is therefore not considered to be appropriate within the City of London.

Crossrail

- 8.1.10. The Mayor of London Community Infrastructure Levy 2 was implemented from 1 April 2019. It requires development across London to make a contribution towards the funding of Crossrail 1 and Crossrail 2. The Mayor's CIL2 sets a charging rate for all development in London, with a higher charging rate for office, retail and hotel development in Central London, including in the City of London. The Mayor's CIL2 is payable in addition to the City of London CIL.
- 8.1.11. ~~The London Plan requires development to make a financial contribution towards the construction cost of Crossrail, through both s106 planning obligations and the Mayoral CIL. Planning obligations contributions will be required from office, hotel and retail development and CIL contributions from all qualifying development in the City.~~
- 8.1.12. ~~The Mayor has proposed that the Crossrail CIL and s106 contributions will be replaced by a new Mayoral Community Infrastructure Levy 2, which will contribute towards the cost of delivering the Crossrail 2 railway, or other strategic infrastructure if Crossrail 2 does not progress. If agreed, this new MCIL2 will apply a standard CIL rate across the City for all qualifying development, with higher rates of CIL due for office, hotel and retail development in the City.~~

Policy PC1: Viability Appraisals Assessments

1. Development proposals must take full account of the policy requirements set out in this Plan and the London Plan, including financial and other requirements under the Mayoral and City of London Community Infrastructure Levy and s106 planning obligations.
2. Exceptionally, ~~even where policy requirements have been fully taken into account, applicants may consider that these requirements cannot be delivered in full without adversely affecting the overall viability of a development. Proposals which are not compliant with policy requirements will normally be refused. However,~~ where applicants consider that it would not be viable to meet Development Plan policy requirements in full, proposals wish to make a case that non-compliant proposals should be permitted, this must be supported by a scheme specific viability assessment.
3. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a site and/or building will not be a relevant justification for not meeting Development Plan requirements.
4. Viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. If an assessment is redacted, an executive summary will be made public.
5. The City Corporation will seek independent verification of submitted viability ~~appraisals assessments~~, with the cost of verification being met by the applicant.
6. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.

Reason for the policy

- 8.1.13. Delivery of the Local Plan and the London Plan requires developers to make contributions towards infrastructure and affordable housing provision through the CIL and s106 planning obligations. Developers must take into account the full cost of meeting development plan requirements when purchasing sites or buildings and in the design of schemes. **A whole plan viability assessment has been undertaken in the preparation of this Plan demonstrating that implementation of the policies should not adversely impact on the viability of development in the City of London.** Exceptionally, there may be circumstances where a developer considers that meeting development plan requirements in full cannot be delivered without adversely impacting on the viability of a development. In such circumstances, the City Corporation will

require a **site specific** viability **appraisal assessment** to be submitted in support of the proposed lower level of contributions.

How the policy works

- 8.1.14. Where viability **appraisals assessments** are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability **appraisals assessments** set out in national Planning Practice Guidance. In particular, **appraisals assessments** must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the Local Plan and the London Plan. The actual price paid for land will not be a relevant justification for failing to meet the policies in the development plan.
- 8.1.15. The City Corporation will **assess review** viability **appraisals assessments** against the requirements in the Local Plan and London Plan and, where necessary, will seek independent verification of submitted **appraisals assessments** from suitably qualified consultants who have experience of the development market in central London. **Assessment Verification** of viability **appraisals assessments** will consider whether appropriate costs, values and risk rates have been utilised which reflect the ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.
- 8.1.16. The City Corporation will make all viability **appraisals assessments** submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability **appraisal assessment** should remain confidential in whole or in part, they should provide justification to the City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability **appraisal assessment** public. Where the City Corporation considers that an **appraisal assessment** should remain confidential in whole, or in part, it will keep the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.
- 8.1.17. Where the City Corporation agrees that a development cannot meet the full policy requirements for CIL and s106 planning obligations at the date of commencement, but that there are other policy considerations which would nevertheless justify approval of the scheme despite this non-compliance, the Corporation will normally require that a review mechanism be included within any s106 planning obligation, with a review of the viability information required at a later stage in the development, or upon occupation. In determining the appropriate mechanism, the City Corporation will have regard to national Planning Practice Guidance, **the London Plan** and the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance. Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.

8.1.18. Policy S3 Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.

8.2. Monitoring

8.2.1. 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, circumstances may change and monitoring of Local Plan policies is essential to determine the extent to which the policies are delivering the Local Plan vision, strategic objectives and spatial strategy.

8.2.2. The City Corporation will prepare and publish at least annually a range of Local Plan monitoring reports, which measure and evaluate progress towards meeting the Plan objectives across a range of policy areas. Policies monitored will include offices; housing; hotels; tall buildings; protected views; sustainability; waste; open spaces and green infrastructure. The City Corporation will also periodically review progress against the programme of infrastructure delivery set out in the Infrastructure Delivery Plan.

8.2.3. The City Corporation is required to review the Local Plan at least every five years from the date of adoption to determine whether it needs to be updated. Data and trends identified in the Local Plan monitoring reports may indicate the need for a partial or full review of the adopted Plan.

Appendix 2: Local Plan – Proposed changes following Sub-Committee Meeting 14 January 2020

1. At the meeting of the Sub-Committee on 14 January 2020, Members requested a number of changes to draft policies and supporting text. The following policies have been amended in line with Member wishes. Changes are shown as highlighted text. Supporting text (where not attached) has also been amended to ensure it is aligned with draft policy.
2. In relation to Policy VT5, Members were concerned about the proposed approach to drone facilities. In response, policy references to drones have been deleted and additional supporting text added under 'Reason for the Policy'.

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 **minimum** BREEAM rating of “excellent” ~~or~~ and **aim for** “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, pollution and materials);
 - demonstrate that London Plan carbon emission and air quality requirements have been met on site, **retaining embodied carbon within building structures where feasible**. In exceptional circumstances where standards cannot be met on site 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.

Policy D5: Terraces and Viewing Galleries

1. Roof terraces will be ~~permitted providing~~ **encouraged where**:
 - 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, **unacceptable disturbance from noise** or **other** significantly adverse impacts on residential amenity. **Where there is a potential for a**

significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;

Historic or locally distinctive roof forms, features or structures **are can be** retained and enhanced;

There would be no adverse impact on protected views;

The design and layout of the terrace **maximises optimises** the potential for urban greening;

Emissions from combustion plant will not affect users of the **roof garden terrace**.

2. **Where roof terraces and viewing galleries are proposed, security risks must be addressed at the design stage and space for security checks incorporated into the development, where required**
3. The provision of free to enter, publicly accessible areas will be required as part of all tall building **or major** developments, which may include **roof gardens and terraces or** public viewing galleries **at upper levels**, where appropriate.

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.

Reason for the policy

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. **The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.**

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 **encouraged 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 **immediate and wider** settings;
 - the provision of a high-quality public realm at street level; and
 - the environmental impact the tall building may have on the surrounding area, including 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 and White Tower protected silhouette of the Tower of London;** and Monument views and setting; **all** as defined on the Policies Map.

Reason for the policy

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

Tall buildings are defined as those exceeding 75m AOD in height. **Error! Reference source not found.**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. **Tall buildings in the City may have impacts on locations within adjacent boroughs. Developers should ensure that any cross-boundary impacts are fully addressed.**

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.

All of the City of London is sensitive to development of tall buildings **and** the City Cluster represents the most appropriate area for **encouraging** tall buildings in the City. This does not mean that **every all sites** within the **Cluster is are** suitable. **All new tall building proposals will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan. Any new tall building proposals 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 **specifically** to new tall building proposals in that area **the City Cluster.**

Outside of the City Cluster, there is **limited less** scope for new tall buildings due principally to conservation area and views protection considerations. **Error! Reference source not found.**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.**

How the policy works

Tall buildings are high-profile developments **with a wider impact**, 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.

Tall buildings **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.

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.

Proposals for new tall buildings should take account of the cumulative impact of **other** 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.

Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. **They 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.**

The City Corporation will use 3D digital modelling technology to visually assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyline. This assessment will support detailed consideration of development proposals against the policies in this Plan. Developers should submit virtual models of their development in an open source or other format compatible with the City Corporation's 3D digital model to enable this assessment.

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 **and retain embodied carbon**;
 - Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials;
 - Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage;
 - 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.