



Delegated Authority and Urgency Decisions

Date: 30 MARCH 2020 – 5 APRIL 2020

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**Delegated or Urgent Decisions Taken in Accordance with the Court of Common
Council's Standing Orders**

**John Barradell
Town Clerk and Chief Executive**

AGENDA

1. **PLANNING & TRANSPORTATION COMMITTEE 31.03.20 - REPORT OF ACTION TAKEN**

For Decision
(Pages 1 - 270)

2. **AUDIT & RISK MANAGEMENT COMMITTEE 31.03.20 - REPORT OF ACTION TAKEN**

For Decision
(Pages 271 - 352)

3. **GENERAL PURPOSES OF THE COURT OF ALDERMEN 05.04.20 - REPORT OF ACTION TAKEN**

For Decision
(Pages 353 - 356)

4. **COMMUNITY & CHILDREN'S SERVICES - TAXI CARD SCHEME REPORT OF ACTION TAKEN**

For Decision
(Pages 357 - 364)

5. **CITY OF LONDON POLICE AUTHORITY BOARD - REPORT ON ACTION TAKEN [30 MARCH 2020]**

For Information
(Pages 365 - 366)

6. **CAPITAL BUILDINGS COMMITTEE - REPORT ON ACTION TAKEN [30 MARCH 2020]**

For Information
(Pages 367 - 368)

Committee(s) Planning and Transportation Committee	Date(s): 14 May 2020
Subject: Report of Action Taken	Non-Public
Report of: Town Clerk	For Information
Report author: Gemma Stokley, Town Clerk's Department	

Summary

This report advises Members of action taken by the Town Clerk since the last formal meeting of the Committee, in consultation with the Chair and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and (b).

Recommendation:

- That Members note the report.

Main Report

1. Since the last formal meeting of the Committee, approval was given for six decisions to be made under the urgency procedures, Standing Order No. 41:

Urgent Authority – PARKING COMMS [27 March 2020]

2. In response to the unprecedented COVID-19 crisis, and consistent with the advice of London Councils on parking, the City of London adopted a proportionate stance on parking enforcement, supporting key workers and being responsive and flexible to the current situation and in line with the industry guidance.
3. The City has adopted a common-sense parking enforcement approach whilst reducing the risk to individuals. The focus is on operating a rapid response service able to respond to issues and problems identified by CCTV and / or called through to our enforcement hotline, maintaining road safety and ensuring access to goods and services.
4. This approach was approved by the Gold Group and the Chair/Deputy Chairman of the Planning and Transportation Committee were kept informed of plans throughout. The need for approval under urgency was to ensure that this vital information was communicated as quickly and as widely as possible.

Urgent Authority – SERVICE CHANGES (CONSOLIDATED) [6 April 2020]

SUBJECT 1 : Car Park Management

5. As a result of the COVID-19 crisis, our current parking contractor, reduced their resource to manage our six car parks and this, in turn, affected their ability to

operate these on a 24/7 basis in the way that they normally would. As a result, the hours of operation of all six car parks were temporarily reduced to operate from 7am to 7pm only, allowing unhindered access outside of these hours.

6. Officers were reluctant to consider closing the carparks entirely as this would directly and adversely affect access for both critical workers and residents. Instead, available resource was reviewed and a decision was taken by the Town Clerk in consultation with the Chair and Deputy Chairman to allow three of the most critical car parks (Smithfield, London Wall and Baynard House) to be staffed and revert back to a 24/7 operation. This will mean that the remaining three at Tower Hill, Minories and Barbican Centre will operate free of charge and without access restrictions, for the time being. The advantage of this approach will that we are able to assist key workers with parking closest to Barts hospital. However, income from the three car parks not being actively managed will potentially cease. We aim to provide patrols of these car parks, but these will be mobile and not therefore permanently at the sites.
7. Gold group were consulted on and approved the recommended way forward prior to the decision being taken and the Chairman and Deputy Chairman of the Streets and Walkways Sub-Committee were also kept informed of the plans throughout and informally voiced their support for these.

SUBJECT 2 : Concessionary Parking

8. From the outset of the COVID-19 crisis, the City received a number of requests for free parking from people attending hospital for treatment for underlying illnesses, and who had health concerns about travelling on public transport as well as concerns regarding car parking fees. It therefore seemed appropriate to agree concessionary parking for such individuals if supported by some form of evidence of medical need such as an appointment letter.
9. Gold group were consulted on and approved the recommended way forward prior to the decision being taken by the Town Clerk in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee. The Chairman and Deputy Chairman of the Streets and Walkways Sub-Committee were also kept informed of plans throughout and informally voiced their support.
10. The need for approval under urgency in both cases was to ensure that vital information was communicated as quickly and as widely as possible to avoid confusion/ misunderstanding and also to support the critical and highly valued work of the NHS and other key workers, as well as critically ill patients attending Barts hospital.

Urgent Authority - Planning and Transportation Committee – 31 March 2020 – Decisions arising from COVID-19-affected informal/virtual Meeting [20 April 2020]

11. With Members unable to attend physically in light of the public health implications arising from COVID-19, the 31 March 2020 meeting of the Planning and Transportation Committee could not meet in its usual, public format at the Guildhall.

In lieu of a formal meeting, Members were given the opportunity to informally discuss two 'for decision' reports via video and teleconference, as well as by email, with a view to facilitating Member oversight and scrutiny to inform any decisions taken under urgency procedures following the meeting.

12. Both matters were decided under urgency procedures as there was a desire to ensure that these matters could be progressed without undue delay and the current COVID-19 situation was such that it was unclear at that time when a further quorate meeting of the Planning and Transportation Committee might be convened.

SUBJECT 1: City of London Local Plan Review: Proposed Publication, Submission and Examination of the City Plan 2036

13. The Town Clerk, in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee agreed the Proposed Submission City Plan 2036 as set out at Appendix 1 of the report considered and supported by the 31 March informal virtual meeting of the Committee and agreed that it be published for consultation. The Director of the Built Environment was also authorised to make further non-material amendments and editorial changes prior to public consultation and submission to the Secretary of State.

SUBJECT 2: Advertising 'A' Boards Policy

14. The Town Clerk, in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee, agreed to option C as set out within the report to the informal virtual meeting of the Committee on 31 March 2020 and supported by Members: that A-Boards should not be permitted on the public highway in the City; and
15. It was also agreed that the decision on when to begin implementing the education and enforcement plan be delegated to the Director of the Built Environment in discussion with the Chair and Deputy Chairman of the Planning and Transportation Committee, in line with the views expressed by Members at the virtual, informal meeting of the Committee held on 31 March 2020.

Urgent Authority - RINEY – RETURNING TO WORK ON CAPITAL PROJECTS (S278's) [27 April 2020]

16. Riney, our term maintenance contractor, have reduced their resource to manage all critical works including highway inspections and highway defects. As of the end of April, patching and street lighting project works have also returned. It should be noted that all risk assessments and method statements have been amended to allow for social distancing when undertaking these tasks.
17. Further to working with Riney at director level, the City acknowledged that works on our capital projects (S278's, Crossrail, Bank) could now also be slowly phased back. Each project/site will have an amended risk assessment and method statement attached to it to ensure that social distancing is being adhered to. If the

required standards at specific sites cannot be achieved, then the works operation will NOT commence. Supervision of the sites will be undertaken via video links, further to direct engagement with the teams working on each site. This is not our preferred option, but it will help us to control and inspect the works during this difficult time.

18. Before any works commence, it is standard process to notify local residents and businesses. Obviously, these operations/businesses will be quieter than normal due to the ongoing COVID-19 crisis, but Officers will, nevertheless, still follow this process. Relevant Ward Members will also be notified of the works via email and project managers will use their contacts within the comms strategy to make all Members aware of these plans in due course. In terms of noise, all works have to adhere to the City's stated work hours and these will be no exception.
19. In line with recent government advice about keeping the economy moving and the acknowledgement that building sites seem to be scaling up once again, a suitable and sufficient approach was agreed by the Town Clerk in consultation with the Chair and Deputy Chairman of the Planning and Transportation Committee under urgency procedures in terms of returning our contractors to work in a safe and controlled manner.
20. The City Corporation's Gold Group were consulted on and approved the recommended way forward. The Chairman and Deputy Chairman of the Streets and Walkways Sub-Committee were also kept informed of the plans throughout and informally voiced their support for these.
21. The need for approval under urgency was to ensure that Officers have sufficient time to align resource and material (from specialised suppliers) to ensure that these works can commence on the stated dates. All materials have lead-in times and Officers need to ensure that due warning can be given before returning to work. Furthermore, Officers need to ensure that this information is communicated as quickly and as widely as possible to avoid any unnecessary confusion/misunderstanding, whilst also allowing for the correct paperwork and working practices to be put into place.

Conclusion

22. Background papers for Members are available from Gemma Stokley on the email address provided below.

Gemma Stokley

Town Clerk's Department

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Committee(s): Planning and Transportation Committee Policy & Resources Committee Court of Common Council	Date(s): 31/03/2020 07/05/2020 21/05/2020
Subject: City of London Local Plan Review: Proposed Publication, Submission and Examination of the 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 City Corporation is reviewing its Local Plan, which sets out the Corporation's vision, objectives and policies for planning the City of London. The current City Local Plan was adopted in 2015 and sets the context for land-use and development requirements up to 2036. The new Local Plan will have an end date of 2036.

Preparation of the new Local Plan has been informed by two rounds of public consultation, firstly on key issues and potential policy options in autumn 2016 and then on a full draft Plan between November 2018 and February 2019. Other factors that have influenced the new Plan include national planning policy, the Mayor's London Plan, an evidence base of research, a supporting Integrated Impact Assessment and delivery of the Corporate Plan and other City Corporation strategies.

Since the close of consultation on the draft Local Plan, the Local Plans Sub Committee of the Planning and Transportation Committee has met on several occasions to agree a revised version of the Plan, known as the Proposed Submission City Plan 2036, which is now recommended to the Grand Committee, Policy & Resources Committee and Court of Common Council. This report highlights the main changes that have been made to the November 2018 draft Plan. A full version of the Proposed Submission City Plan 2036 is attached as Appendix 1.

Following Committee and Court agreement, the Proposed Submission City Plan 2036 will be subject to a final period of public consultation before being submitted to the Secretary of State for Housing, Communities and Local Government for examination by an independent Planning Inspector. The new Plan is expected to be adopted in 2021.

Recommendations

Members are recommended to:

- Agree the Proposed Submission City Plan 2036 set out at Appendix 1 of this report and that it be published for consultation;

- Agree that, following consultation, the Plan, the public representations and other supporting documentation be submitted to the Secretary of State, for Examination;
- Authorise the Director of the Built Environment, in liaison with the Chair and Deputy Chair of the Planning & Transportation Committee, to compile a list of further changes to the Local Plan in response to public representations and submit this to the Secretary of State; and
- Authorise the Director of the Built Environment to make further non-material amendments and editorial changes prior to public consultation and submission to the Secretary of State.

Main Report

Background

1. The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. The Local Plan has to be consistent with national planning policy and in general conformity with the London Plan, which is currently being reviewed by the Mayor. A revised London Plan underwent an Examination in Public last year and the Mayor issued an 'Intend to Publish' version in December 2019. However, the Secretary of State for Housing, Communities and Local Government has ordered the Mayor not to publish (i.e. adopt) the new Plan until certain changes are made, which are primarily aimed at increasing housing delivery.
2. The current City Local Plan, adopted in 2015, sets out the planning policy context for development in the Square Mile up to 2026. The National Planning Policy Framework (NPPF) indicates that local plans should look ahead over a minimum 15-year period from adoption to anticipate and respond to long-term requirements and opportunities. The NPPF also requires that Local Plans be reviewed at least every 5 years to ensure that they are up to date.
3. The first formal stage of the City's Local Plan review was to consider key issues and potential policy options, with an Issues and Options document being published for consultation between September and December 2016. After this work began on preparing a full draft Plan, informed by a range of factors such as national policy, the draft London Plan, the Corporation's aspirations and evidence studies as well as public consultation feedback.
4. The draft City Plan 2036 was issued for public consultation between November 2018 and 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 the written comments received is available on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.

5. The Local Plans Sub Committee has met a number of times during the past year to consider the key issues arising from the consultation responses, to provide a steer to officers on the appropriate way forward and to consider in detail and agree the proposed changes to the draft Local Plan. Those changes have also taken account of revisions to the London Plan following the Examination in Public held between January and May 2019, and revisions to national planning policy and guidance, including a new version of the National Planning Policy Framework in February 2019.

Key Issues Raised through consultation on the Draft Local Plan

6. Consultation comments were received on all aspects of the draft Plan and there was no single, dominant theme. The main points raised were:
 - a) **Vision and Objectives**

There was widespread support for the Plan's vision and objectives, particularly the ambition to retain the City's role as a world leading office and professional services centre. Questions were raised, particularly by residents, about potential conflicts between Plan policies, for example reconciling aims to protect amenity and reduce pollution with encouraging increased vibrancy and activity.
 - b) **Healthy and Inclusive City**

There was support for the overarching themes and ambition to deliver a healthier and more inclusive City. The inclusion of policies at the front of the Plan and priority given to this agenda was supported. There was particularly strong support for measures to address poor air quality and a number of suggestions for initiatives to deliver improvements.
 - c) **Urban greening**

There was widespread support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity. There was some concern from developers about the feasibility and viability of providing more greening on buildings.
 - d) **Transport**

A range of transport issues were raised, with themes very similar to those raised in the Transport Strategy consultation. Particular issues included freight deliveries, pedestrian permeability, provision for cyclists and whether the Plan's transport proposals were ambitious enough and/or deliverable.
 - e) **Tall buildings, protected views and heritage assets**

Concerns were raised about the impact of tall building development on the setting of the Tower of London and St Paul's Cathedral, including from the processional route along Fleet Street and Ludgate Hill. Questions were raised as to whether the policies are clear enough and consistent with policies in neighbouring boroughs, about the quality of design of tall buildings and the cumulative impact of development.

- f) **City Cluster**
Questions were raised around how the City Corporation will manage further intensification of this area, particularly the impact on City streets of increased traffic and footfall, whether or not the area should be expanded to allow further tall buildings.
- g) **Culture Mile (Smithfield and Barbican Area)**
There was support for the Culture Mile initiative and the wider policies proposed for the Smithfield and Barbican Area but concerns about the impact of proposed developments and activities on residential amenity. A number of comments raised issues about the future of Smithfield Market, with an expectation that the Plan should provide clear guidance on potential future uses.
7. Other parts of the draft Plan received fewer comments. Issues raised included:
- Whether the retail policies were flexible enough to respond to changing retail patterns and a desire for more independent shops.
 - Support for requiring flexible office floorplates and the growth in office floorspace.
 - Some concern from developers about the cumulative impact of the Local Plan policies on the viability and deliverability of development.

Proposed Submission City Plan 2036

8. Attached at Appendix 1 is the Proposed Submission version of City Plan 2036. The structure of the Plan follows that of the City Corporation's Corporate Plan to help ensure that spatial planning is aligned as far as possible with wider corporate objectives. The Plan aligns with the adopted Transport Strategy and Air Quality Strategy and has been prepared alongside initial work on the City's Climate Action Strategy to ensure an integrated approach. The Plan sets ambitious targets to deliver a zero carbon City, additional urban greening and incorporate circular economy principles.
9. The main changes compared to the draft Plan are summarised below, in Plan order:
- The addition of a spatial strategy to link the vision and strategic objectives to the Key Diagram and the detailed policies.
 - Further strengthening of the air quality policy to reflect the City Corporation's new Air Quality Strategy and changes to the London Plan.
 - A new policy on Health Impact Assessments to embed the consideration of health impacts within the planning process.
 - A commitment to deliver 50% affordable housing on public sector land in accordance with the draft London Plan policy approach.
 - A more flexible approach to the loss of office floorspace to residential use in or near residential areas, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be more complementary to the business City.

- The addition of a requirement for major development applications to include Cultural Plans to show how the development will help enrich and enhance the City's cultural offer.
 - Greater emphasis on the use of 3D computer modelling technology to assist in the determination of planning applications.
 - Differentiation between the policy approaches for proposed development affecting designated and non-designated heritage assets.
 - Refinements to the policies on tall buildings and protected views, including clarifying that the White Tower protected silhouette of the Tower of London on the eastern fringe of the City is an area inappropriate for tall buildings.
 - A new policy on trees, which was an omission from the draft Plan.
 - Extension of the Fleet Street Key Area of Change to include Ludgate Hill and Carter Lane, emphasising the importance of the Fleet Street/Ludgate Hill spine which forms part of the historic processional route between Westminster and the City.
10. The current adopted Local Plan includes two Policies Maps showing which policies apply to specific locations. Updated versions of these Policies Maps have been produced to illustrate the proposed policies in the Proposed Submission City Plan 2036. These are attached to this report at Appendix 2.

Potential risks

11. The key changes summarised above, and other minor wording changes, have improved the Plan and should ensure that it is robust and will meet relevant legal and soundness tests required by national planning policy.
12. Members will be aware that the Government considers that the City of London has not delivered the required level of new housing set out in the national 2019 Housing Delivery Test (HDT). Officers are in discussion with Government officials over the Test results and, particularly the apparent omission of the Sugar Quay housing development from the figures which would have made a significant positive difference to the Test result. Officers are of the view that a sound case can be made that the Proposed Submission City Plan 2036 would enable housing delivery that meets the required levels. However, the issue of housing delivery is likely to feature at the Plan Examination.
13. Future progress of the Local Plan may be impacted by the effects of Covid-19 pandemic. Several other local plan examinations have been put on hold due to the outbreak. Officers will keep the timetable under review and make any required adjustments, as appropriate.

Non-material editorial changes

14. Given the size and scope of the Local Plan, some minor further amendments and editing may be required. This includes the correction of typographical errors and the addition of updated infographics. Members are asked to authorise the Director of the Built Environment to make such non-material changes, which will not affect the proposed policy content.

Integrated Impact Assessment

15. The review of the Local Plan has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes and meets the City's obligations under the Public Sector Equality Duty:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Assessment; and
 - Health Impact Assessment.
16. IIA is an iterative process which has been used to assess emerging policy options and the final policies in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. The IIA has been produced in-house but has been independently audited by consultants. A Non-Technical Summary is attached as Appendix 3 to this report. It is intended that a hard copy of the full IIA document will be placed in the Members' Reading Room and published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
17. A Habitat Regulations Assessment (HRA) Screening Report has been undertaken by consultants to assess whether the City Plan 2036 would have any significant effects on sites designated as being of European importance for their biodiversity. This concludes that the Plan is not likely to have a significant effect on any such site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA, although the opinion of Natural England will be sought on the approach and conclusions of the Screening Report. It is intended that a hard copy of the HRA Screening Report will be placed in the Members' Reading Room and published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.

Evidence base

18. 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.
19. Further evidence has been 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.

20. 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. The City Corporation is required to demonstrate that the impact of the Local Plan will not make development across the City unviable. The test is one of the impact on development generally, not a test for each individual site that comes forward. The viability report found that the overall impact of the Plan policies on residual land values ranges from 0.79% to 4.38% and the cumulative impact of the requirements did not render development in general unviable. A few development typologies, primarily for residential or hotel use, were found to be unviable, but this reflected site specific factors.
21. It is intended that hard copies of the Infrastructure Delivery Plan and the Local Plan Viability Assessment will be placed in the Members' Reading Room and published on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
22. 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 before the Plan is submitted for Examination.

Next steps

23. The Plan will be published for a final six-week period of public consultation, which is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. It 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. At the time of writing, public consultation is scheduled to take place in June and July with submission in September 2020.
24. There is no formal opportunity for the City Corporation to make significant further changes to the Plan in response to public comments received during the summer consultation. However, past experience has shown that some remaining objections can be resolved by relatively limited changes, which saves considerable time, discussion and expense at the examination. It is recommended that the Director of the Built Environment, in liaison with the Chair and deputy Chair of the Planning & Transportation Committee be authorised to compile a list of any further proposed limited changes in response to representations received and to submit these to the Secretary of State. If any issues of fundamental significance to the soundness of the Plan were to emerge during the consultation, then the Plan would be brought back to the Planning and Transportation Committee to agree an appropriate way forward.
25. 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 in 2021.

Corporate and Strategic Implications

26. The review of the Local Plan has been informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The Local 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.
27. Preparation of the Local Plan is being delivered within DBE's Local Risk Budget. This includes funding to cover the preparation of the relevant evidence, but additional funding may be required to cover the cost of the examination scheduled for winter 2020/21 should it become longer and more expensive than currently anticipated. The scope of the examination and financial and resource implications will become clearer following submission of the Plan and initial assessment by the Planning Inspectorate.

Appendices

- Appendix 1 – Proposed Submission Draft Local Plan (City Plan 2036)
- Appendix 2 – Policies Maps (A & B)
- Appendix 3 – Integrated Impact Assessment Non-Technical Summary

Background Papers

- Report to Planning and Transportation Committee on 27th October 2018 “City of London Local Plan Review: Proposed Draft Plan”.
- Reports to Local Plans Sub Committee on 6th March 2019, 17th May 2019, 19th July 2019, 14th January 2020, 3rd February 2020 and 10th February 2020
- Responses to public consultation on the Draft Local Plan (available at www.cityoflondon.gov.uk/cityplan2036)
- City Plan 2036 Integrated Impact Assessment
- City Plan 2036 Infrastructure Delivery Plan
- City of London: Local Plan Viability Assessment

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

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1. Introduction

1.1. What is the Local Plan?

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

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

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

1.3. The stages of preparing the Local Plan

- 1.3.1. The Proposed Submission Local Plan, titled City Plan 2036 (the 'Plan'), is the third stage of preparing a new local plan. The first stage of the process was the Issues and Options stage in 2016, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered to address them. The second stage, the draft Local Plan, was a consultation on a full draft Plan during late 2018 and early 2019.

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

1.3.3. Following consultation on the Proposed Submission Plan, it will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan later in 2020. The Local Plan is expected to be adopted in 2021.

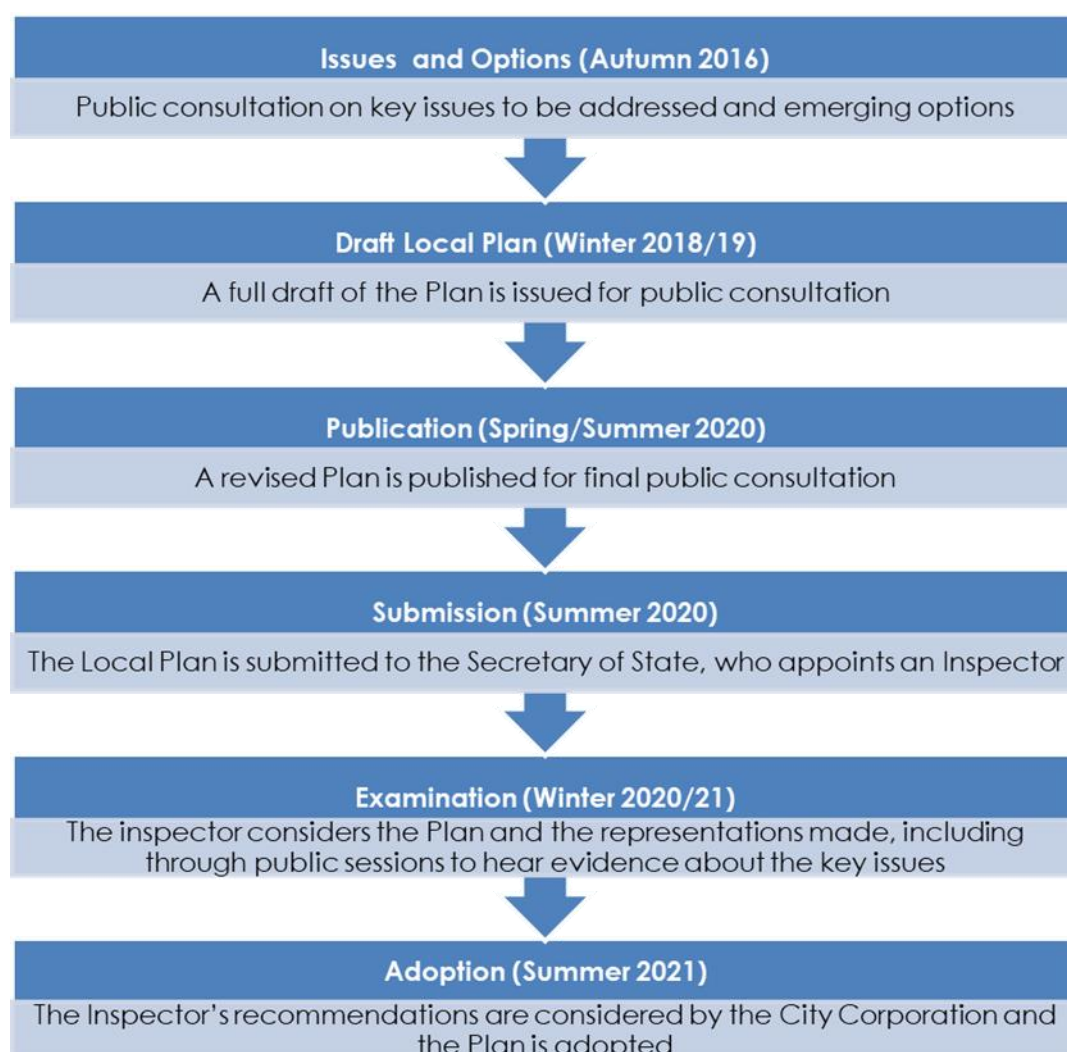


Figure 1: The main stages of preparing the new Local Plan

1.3.4. Figure 1 illustrates the stages in the preparation of City Plan 2036, together with an indicative timescale.

Policy context

1.3.5. As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on international and national economic considerations and other external policies, particularly the United Kingdom's future trading relationship with the European Union and the rest of

the world. Within this wider framework, the Local Plan can provide an environment which encourages appropriate development and is responsive and adaptable to change.

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

National planning policy and guidance

- 1.3.7. Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.

The London Plan and other Mayoral strategies

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

Neighbourhood Plans

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

Duty to co-operate

- 1.3.12. Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires local

planning authorities to engage “constructively, actively and on an ongoing basis” on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.

- 1.3.13. The City Corporation already works closely and co-operates with its neighbouring boroughs, the Mayor of London and other partners on strategic and cross boundary planning issues. National planning policy requires strategic policy-making authorities to prepare and maintain statements of common ground to demonstrate effective and ongoing joint working. The City Corporation is liaising with the Mayor of London, neighbouring boroughs and other duty to co-operate partners to agree statements of common ground to support the development of City Plan 2036 and the development plans and strategies of partners.

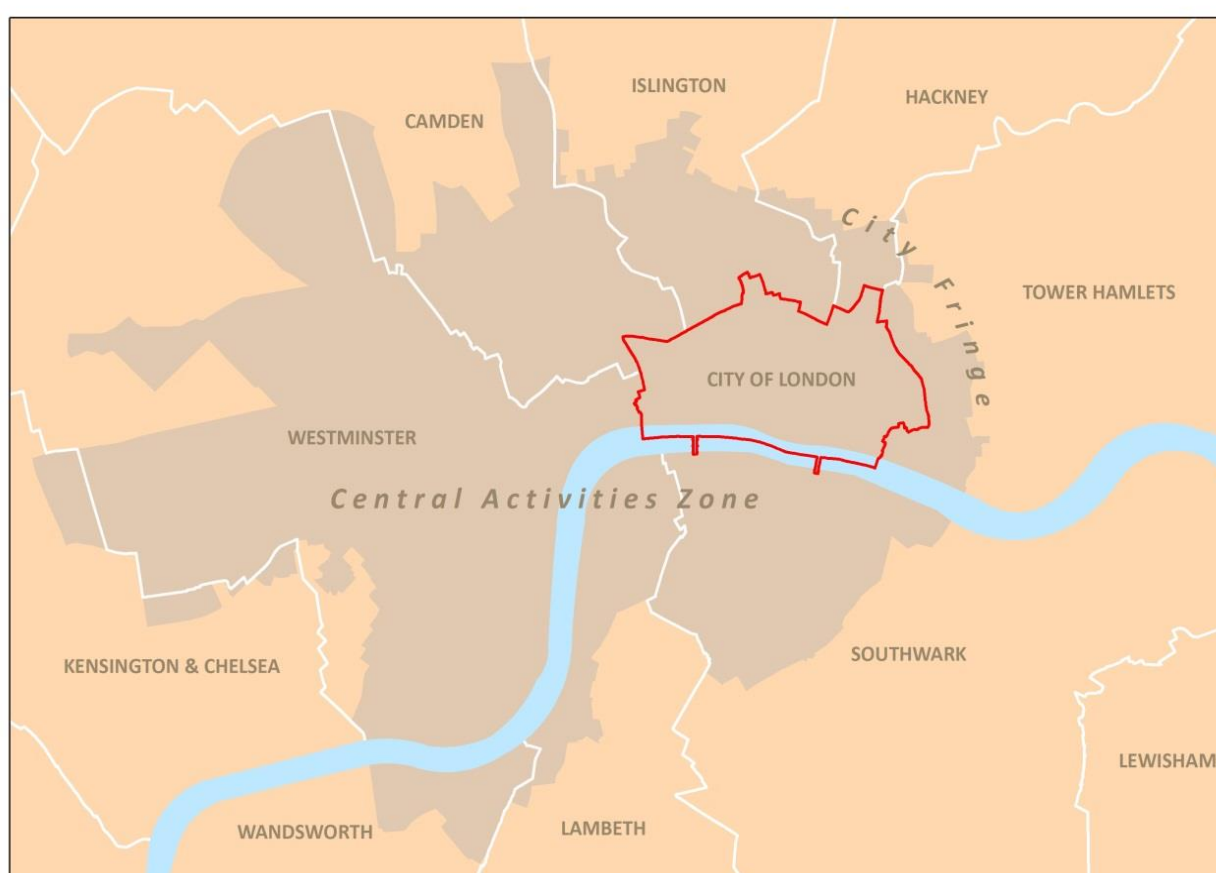


Figure 2: Strategic context: The City of London's location within the Central Activities Zone

City Corporation strategies

- 1.3.14. The Local Plan can help to facilitate the delivery of other City Corporation strategies where their objectives involve the use or development of land and provides a mechanism to assist with co-ordinating and balancing the requirements of different strategies.
- 1.3.15. In particular, the Local Plan is one of the mechanisms through which the City Corporation's Corporate Plan will be implemented. The Corporate Plan sets out

the City Corporation's overarching strategic direction and is structured around the three pillars of society, economy and environment. Although the Corporate Plan has a shorter time horizon than the Local Plan (2018-23), it is a visionary and forward-looking document and City Plan 2036 complements and helps deliver many of its objectives.

1.3.16. This Plan has been prepared alongside the City Corporation's first Transport Strategy. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in City Plan 2036 and the Transport Strategy are aligned.

Evidence base

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

Integrated Impact Assessment

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

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

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

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

Other planning documents

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

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

Implementation and delivery

- 1.3.22. Implementation of the Local Plan-will require partnership working and co-operation with a range of organisations, including developers, businesses, residents, community and amenity groups, transport and service providers, the Mayor of London and other London boroughs.
- 1.3.23. A key mechanism for implementing the Local Plan is the consideration of planning applications through the development management process. Policies in this Plan apply to all development, including major new development, extensions to existing buildings, other major refurbishments and minor development, unless otherwise specified in individual policies. The Local Plan should be read as a whole and applications for planning permission will be considered against all relevant policies in the Local Plan, the London Plan, the NPPF and any future neighbourhood plans.
- 1.3.24. The City Corporation will work closely with developers, occupiers and residents to ensure that City Plan 2036 is implemented and delivers positive improvements across the City. Where necessary, the City Corporation will use its powers of enforcement to ensure compliance with, and effective implementation of, Local Plan objectives and policies. The City Corporation's Enforcement Plan has been adopted as a Supplementary Planning Document and sets out the principles and procedures that will be followed to ensure development is effectively regulated. Where necessary, enforcement action will be taken. The Enforcement Plan will be kept under review and amended to reflect new provisions arising out of changes to national, London-wide or local policy and/or practice and experience in implementation.
- 1.3.25. The City Corporation will also use its powers in relation to issues such as management of the highways and public realm to help deliver the vision and policies in City Plan 2036. It will, where necessary, use its land and property

ownership to assist with site assembly and use its compulsory purchase powers to enable the high-quality development the City needs. An Infrastructure Delivery Plan has been prepared identifying the infrastructure required to deliver the Plan and demonstrating the deliverability of infrastructure during the plan period. It considers the investment plans of a range of infrastructure providers to identify potential gaps in funding, or trigger points which require a step change in levels of infrastructure. If gaps in the funding of infrastructure necessary to implement the Local Plan are identified, the City Corporation will seek alternative funding streams, including the use of CIL and other contributions from development, and will prioritise available funds.

1.4. Structure of the Draft Plan

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

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

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

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

1.4.4. The structure of the Plan is shown diagrammatically in Figure 3 and is not intended to represent any form of hierarchy.

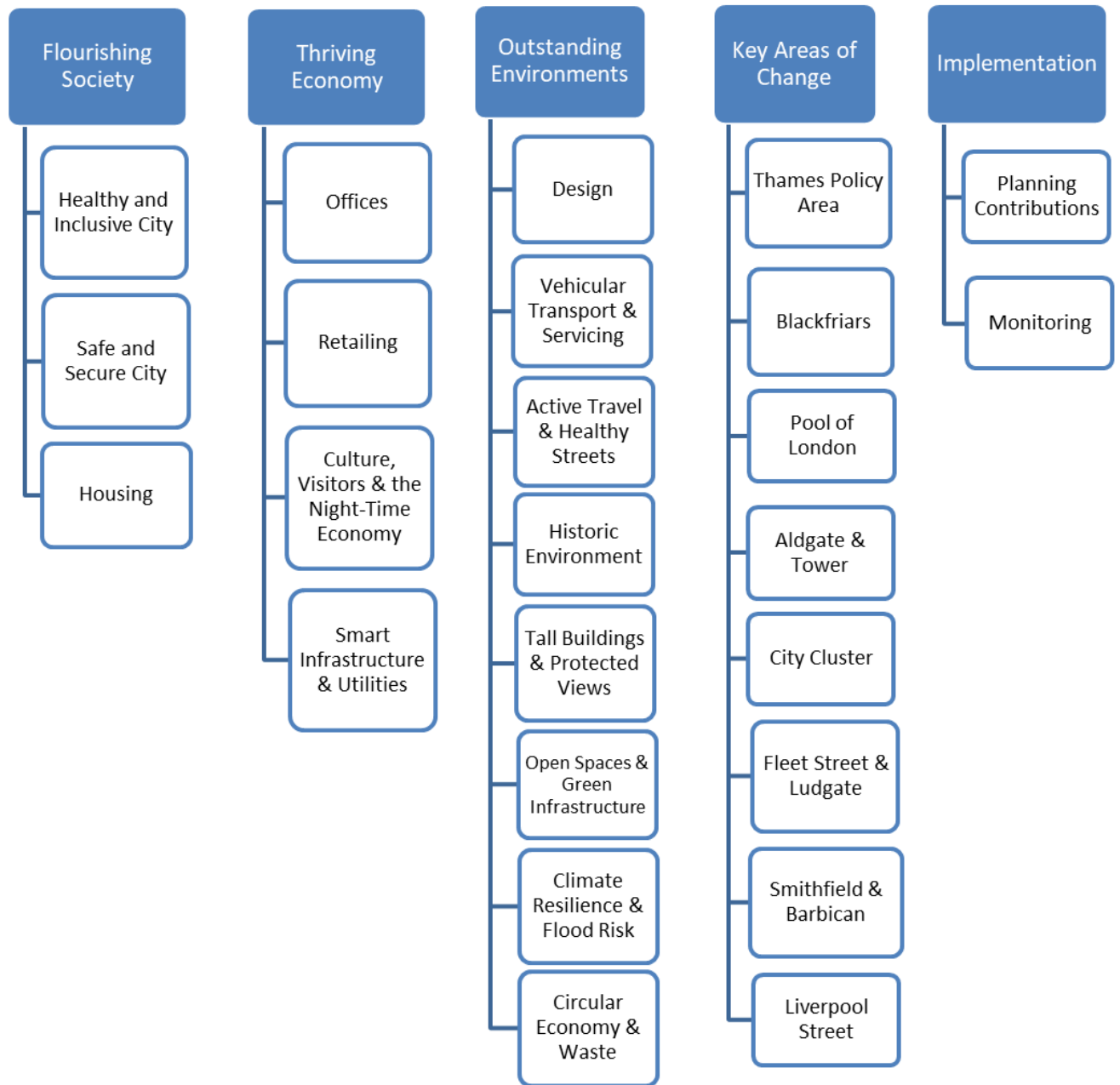


Figure 3: Structure of City Plan 2036

2. The City Today

[This section to be updated using infographics]

- City employment: over 520,000
- 72% employees in financial, professional and business service sector
- 24,000 businesses in the City
- 98% of businesses employ under 250 people
- Large firms provide 50% of jobs
- City office stock: 9,165,000m²
- 1,354,000m² office floorspace under construction
- Number of retail units: 2,000
- Permanent residential population: 8,000
- Number of residential units: 7,725
- 28% of residential units are registered as second homes
- Number of hotels in the City: 39, providing 6,205 hotel bedrooms
- 13 hotels currently under construction
- 21.5 million visitors to the City each year
- 84% of commuter travel to the City is by public transport, 5% by walking and 4% by cycle
- 59 tall buildings over 75m AOD
- 12 tall buildings in the planning pipeline (under construction or permitted)

- Over 600 listed buildings
- 27 conservation areas
- 33 hectares of open space
- Over 100 green roofs, providing 43,000m² of green roof space
- 75% of office permissions submitted since 2014 rated BREEAM Excellent
- 94% of all permissions submitted since 2014 rated BREEAM Excellent or Very Good

3. Vision, Strategic Objectives and Spatial Strategy

3.1. Contribute to a Flourishing Society

The Vision....

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

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

Strategic Objective:

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

3.2. Support a Thriving Economy

The Vision....

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

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

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

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

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

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

Strategic Objective:

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

3.3. Shape Outstanding Environments

The Vision....

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

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

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

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

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

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

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

Strategic Objective:

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

3.4. Key Areas of Change

The Vision....

Blackfriars

- 3.4.1. Redevelopment or refurbishment of existing buildings will provide new high-quality office and commercial accommodation with active ground floors within an improved public realm and environment that better reflects the status of the City. Easier access to the riverside walk and a safer and more pleasant environment for all users, including pedestrians and cyclists, will be delivered. A new area of

public realm at Blackfriars foreshore, created through the Thames Tideway project, will introduce greenery to the riverside and provide a place for relaxation and recreation.

Pool of London

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

Aldgate and Tower

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

City Cluster

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

and priority given to pedestrians on key routes during daytime. Links to public transport nodes and other parts of the City, including to the Elizabeth Line at Liverpool Street Station, will be improved.

Fleet Street and Ludgate

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

Smithfield and Barbican

3.4.6. The Elizabeth Line will significantly enhance public transport accessibility in this part of the City. The Culture Mile initiative, including relocation of the Museum of London to Smithfield and the possible development of a Centre for Music alongside the existing Barbican Centre, will provide outstanding cultural facilities in landmark buildings. Beech Street will be transformed into a more welcoming environment, with significantly improved air quality, and the Beech Street/Long Lane axis will be the focus for a variety of retail units. The wider area will contain a broad mix of uses, including residential, office, retail, hotel, leisure and cultural, while temporary art and cultural installations will further animate the buildings and public realm. The growth of creative enterprise will be particularly supported in this area. The public realm will be enhanced with a distinctive look and feel, creating attractive streetscapes and vistas. Evening and night-time activities will expand and will be well-managed to protect residential amenity. Consolidation of the City Corporation's wholesale markets onto a single site outside of the City will potentially allow the re-use of Smithfield Market for other uses compatible with its heritage status and the City Corporation's ambitions for Culture Mile. St Bartholomew's Hospital will remain a major centre of health excellence. The potential for conflict between vehicular access to commercial and residential uses and the increased numbers of pedestrians will be effectively managed.

Liverpool Street

3.4.7. The area will be enhanced, taking advantage of improvements in public transport accessibility brought by the opening of the Elizabeth Line, and opportunities presented by the remodelling of Broadgate. Pedestrian routes will be enhanced, and active frontages provided at ground floor level to animate and

add vibrancy to the area. Retail uses will be encouraged, and improvements delivered to the public realm around Liverpool Street Station. Additional greening will help to deliver air quality and biodiversity improvements. Office use will continue to be the predominant use but will provide more flexible and collaborative space to meet the needs of potential start-ups and allow for business growth. Collaborative working between businesses in this area, Tech City and creative industries within Culture Mile will create an attractive and vibrant business eco-system.

Strategic Objective:

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

3.5. The Spatial Strategy

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

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

- 3.5.3. Table 1 shows the scale of the projected growth in the main land uses in the City over the period 2016 to 2036.

Land Use	2016-2021	2021-2026	2026-2031	2031-2036	Total
Offices	750,000sqm	750,000sqm	250,000sqm	250,000sqm	2,000,000sqm
Retailing	73,500	73,500	24,500	24,500	196,000sqm
Housing	Average 141pa 2016-2019; 146pa 2019-2036				2,905
Hotels	Average 166pa				2,670 rooms

Table 1: indicative scale and phasing of growth in main land uses 2016-2036

- 3.5.4. The distribution of the development set out in Table 1 reflects the City's primary business function and the expectation that office development will continue to be the main land use and acceptable form of development across the City. Table 2 illustrates the scale of development that could take place in each of the Key Areas of Change and the rest of the City through the

implementation of the policies in this Plan and the development pipeline. The figures are not prescriptive and are presented as percentage ranges.

Key Area	Offices	Retailing	Hotels	Housing
Smithfield and Barbican	0 -10%	10 – 20%	10 – 20%	20 – 30%
Fleet Street & Ludgate	10 - 20%	0 – 10%	0 – 10%	0 – 10%
Liverpool Street	10 – 20%	40 – 50%	0	0
Aldgate and Tower	0 – 10%	0 – 10%	10 – 20%	10 – 20%
City Cluster	50 - 60%	10 – 20%	0 – 10%	0
Pool of London	0 – 10%	0 – 10%	0	0
Blackfriars	0 – 10%	0	0	0
Rest of the City	10 – 20%	20 – 30%	30 – 40%	30 – 40%

Table 2: Indicative distribution of development (% of floorspace, % hotel bedrooms and % housing units)

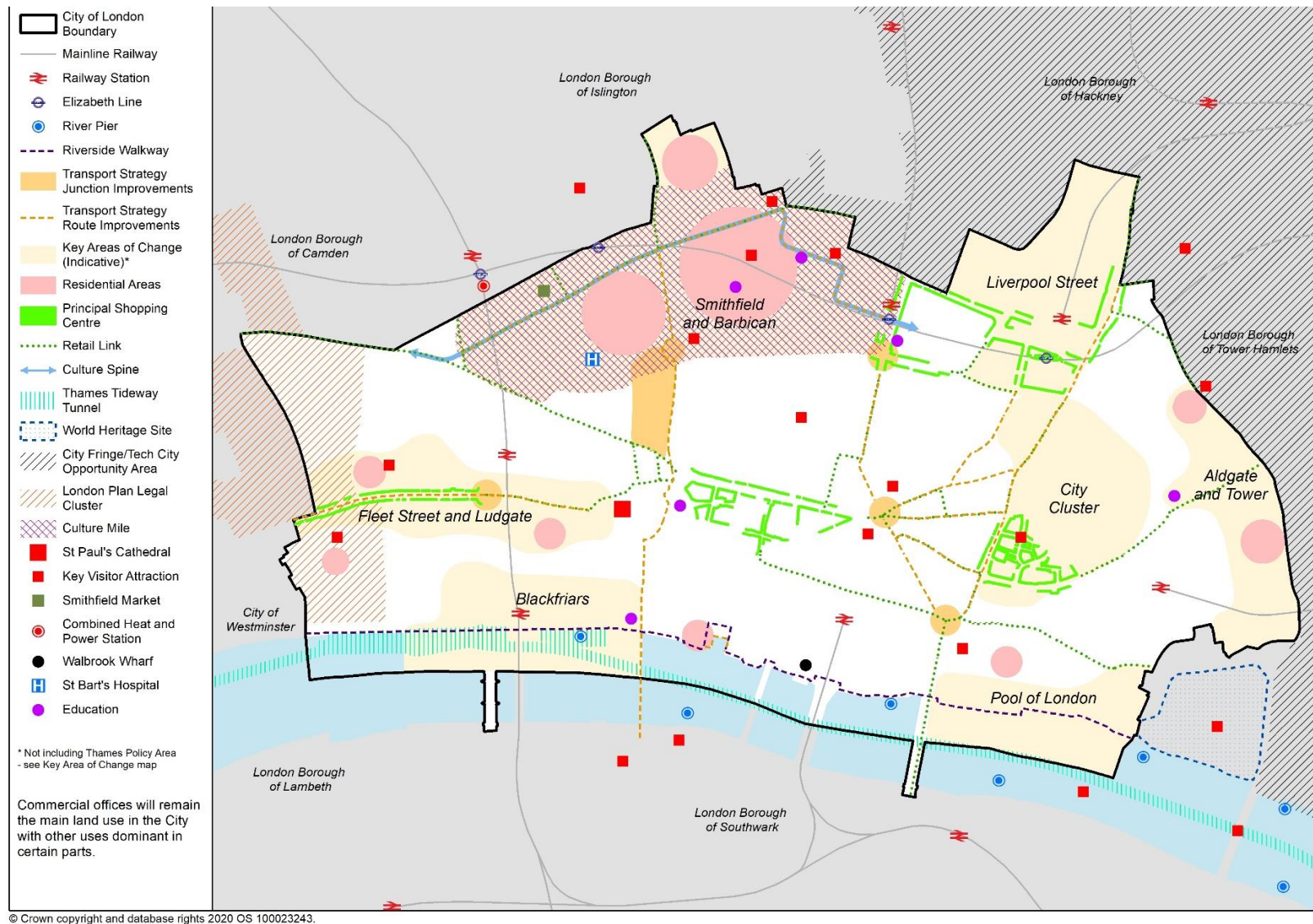
Spatial Strategy

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

1. Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City by 2050, delivering further urban greening and improving air quality.
2. Delivering a minimum of 2 million m² net additional office floorspace and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone.
3. Broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses.
4. Supporting the development of cultural facilities and uses and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative.
5. Delivering at least 1,460 additional homes within the City by 2028/29 to meet housing need and continuing to deliver new housing on City Corporation estates and other appropriate sites outside of the City.

6. Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site.
7. Encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres.
8. Identifying seven Key Areas of Change where significant change is expected in the period to 2036 and providing a policy framework to guide sustainable change in those areas.
9. Balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces.
10. Ensuring that development and infrastructure provision are compatible with the radical transformation of the City's streets set out in the City's Transport Strategy.
11. Promoting greater use of the River Thames, regenerating and enhancing the City's riverside and reducing the risk of flooding.

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



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Figure 4: Key Diagram

4. Contribute to a Flourishing Society

4.1. Healthy and Inclusive City

Context

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

Strategic Policy S1: Healthy and Inclusive City

The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, education, recreation and leisure opportunities.

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

12. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities within major developments and public realm improvements.

Reason for the policy

4.1.6. The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:

- Good mental health for all;
- A healthy urban environment;
- Effective health and social care integration;
- All children have the best start in life; and
- Promoting healthy behaviours.

4.1.7. The Local Plan has a particular role in delivering a healthy urban environment, as it can address issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. The Joint Health and Wellbeing Strategy notes there is strong evidence that the environment shapes wider health outcomes and it seeks to ensure health and wellbeing issues are embedded into the Local Plan and major planning applications.

4.1.8. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.

4.1.9. The small permanent residential population in the City means that it is often not economic to deliver effective services for City residents from locations within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. For example, the City Corporation is working jointly with Islington to deliver the City of London Primary Academy Islington on a site which crosses the City/Islington boundary. The City Corporation will work with the City and Hackney Clinical Commissioning Group and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.

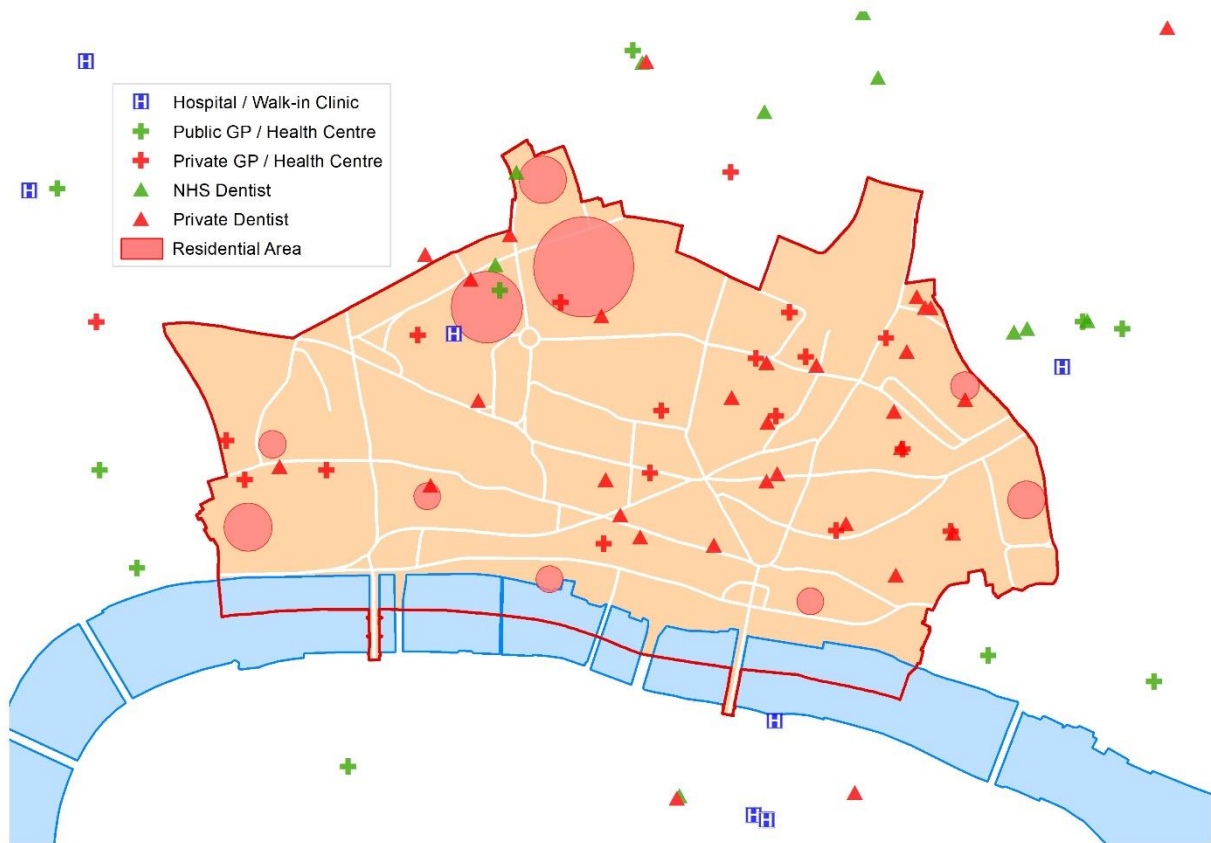


Figure 5: Distribution of health facilities in and adjoining the City

4.1.10. The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.

4.1.11. Advances in technology and an awareness of how office environments can impact people's mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

4.1.12. Outdoor spaces and the public realm are under increasing pressure to provide places for relaxation, amenity and flexible working. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation's Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter

areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels.

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

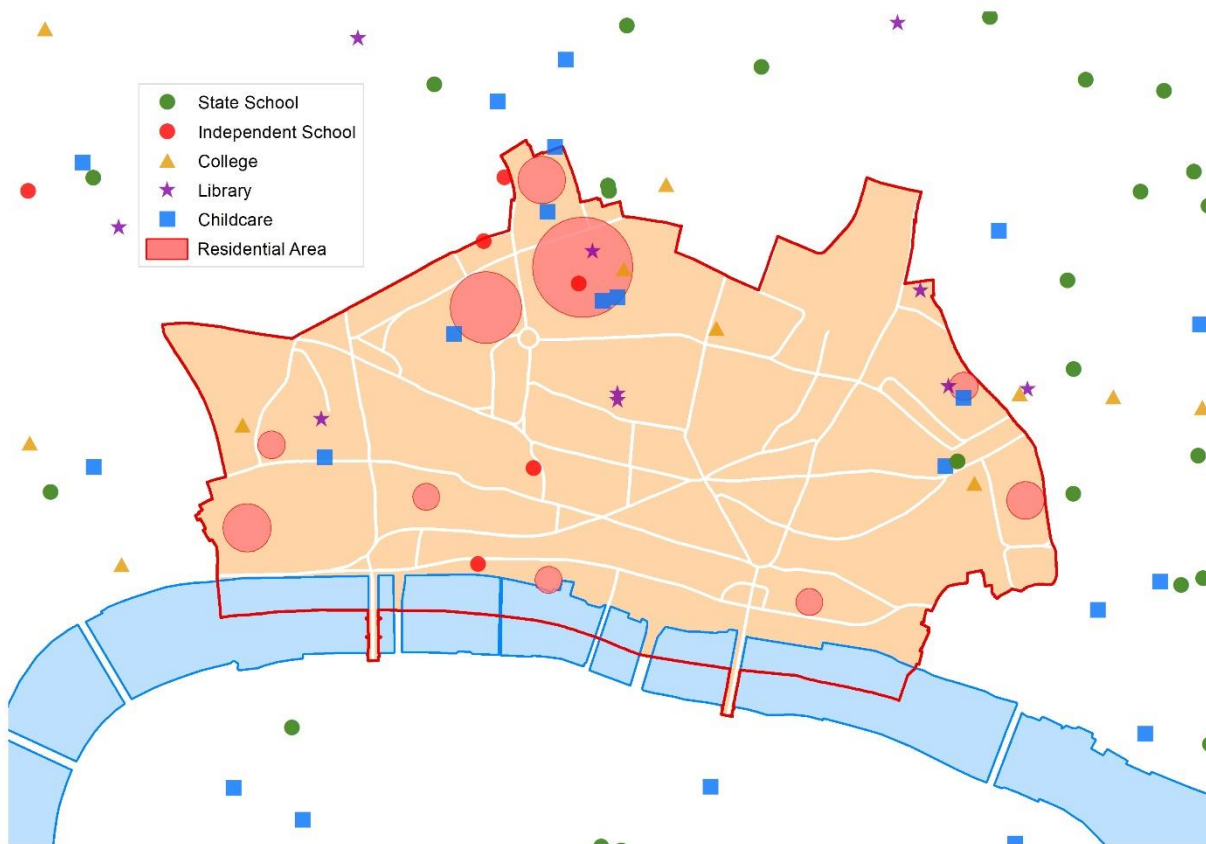


Figure 6: Distribution of skills and education facilities in and adjoining the City

How the policy works

4.1.14. To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and well-being, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling. This could include the provision of land or spaces for food growing, which can help promote a more active lifestyle, improve social cohesion and mental and physical health and well-being.

- 4.1.15. To facilitate the delivery of a healthy city, developers should engage with neighbours before and during construction to ensure impacts on the amenity of neighbours can be minimised.
- 4.1.16. Developers are encouraged to use established assessment methodologies to ensure that development contributes towards a healthy city. There are several accreditation systems that attempt to measure the health and well-being elements of building design, construction and operation and how these features impact on health and wellbeing.
- 4.1.17. Major commercial developments should seek to reach outwards into the community by providing services and facilities which can benefit wider health and contribute to ambitions to reduce single use plastics and other waste through the use of public drinking fountains, as well as providing defibrillators and publicly accessible toilets, for example through membership of the Community Toilet Scheme. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.
- 4.1.18. Major commercial developments are also encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and well-being of the City's communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations.

Policy HL1: Inclusive buildings and spaces

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

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

Reason for the policy

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

How the policy works

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

Policy HL2: Air quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment.
2. Development that would result in a worsening of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be refused.
3. All developments must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NO_x).
4. Developers will be expected to install non-combustion energy technology where available.
5. A detailed Air Quality Impact Assessment will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation.
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions.
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments.
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants.

Reason for the policy

- 4.1.21. Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area, due to national health-based objectives for the pollutants nitrogen dioxide (NO₂) and small particles (PM₁₀) not being met.
- 4.1.22. The City Corporation is working with a wide range of organisations to address this problem and levels of NO₂ are falling, although the health-based limits are still not met everywhere in the Square Mile. The City Corporation's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO₂ by the beginning of 2025. Limits set in European Directives for particulate matter (PM₁₀ and PM_{2.5}) are generally met in the City, except adjacent to the busiest roadsides in unfavourable weather conditions. However, the WHO has identified health impacts even at very low concentrations. The Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM₁₀ and PM_{2.5} by 2030.
- 4.1.23. The City Corporation's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile, including the introduction of local Zero Emission Zones covering Barbican and Golden Lane and the City Cluster by 2022. An interim two-way Zero Emission Street at Beech Street will be implemented in 2020. While the main source of pollutants in the City has historically been road transport, following implementation of the Mayor's Ultra Low Emission Zone in 2019, it is forecast that a greater share of remaining air pollutants will be generated by buildings, with buildings accounting for over half of NO₂ emissions arising in the City. Tackling poor air quality requires a broad range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting on and around buildings and within the public realm can help to trap particulate pollution.

How the policy works

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

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

Policy HL3: Noise and light pollution

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

Reason for the policy

- 4.1.26. The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise and light pollution impacts applies to both development that introduces new sources of noise and light pollution and development that is sensitive to noise and light pollution.
- 4.1.27. Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular

problem where large commercial buildings have lights on during the night, which can impact residential amenity.

4.1.28. The main noise and vibration sources related to new developments in the City are:

- construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
- building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
- leisure facilities and licensed premises, involving noise from people and amplified music; and
- servicing activities such as deliveries, window cleaning and building maintenance.

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

4.1.30. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making. Policy CV4: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.

How the policy works

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

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

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

4.1.34. The City Corporation has adopted a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes

guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes. Lighting proposals should take account of impacts on biodiversity and should be designed to ensure an appropriate habitat to improve biodiversity in the City. Particular attention should be paid to the impact of lighting on the City's bat population.

Policy HL4: Contaminated land and water quality

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

Reason for the policy

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

How the policy works

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

Policy HL5: Location and protection of social and community facilities

1. Existing social and community facilities will be protected in situ unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site.
2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:

- where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - in locations which are convenient to the communities they serve;
 - in or near identified residential areas, providing their amenity is safeguarded; and
 - as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Reason for the policy

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

How the policy works

4.1.38. Existing social and community facilities will be protected in situ, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises, or that necessary services can be delivered from alternative premises without a reduction in service provision. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to another social and community use in the first instance.

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

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

Policy HL6: Public toilets

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

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

Reason for the policy

4.1.41. Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly accessible toilets are a particularly important facility for a number of groups, such as the elderly, those with disabilities, people with babies and young children, pregnant women and others with chronic illnesses. They are also important to meet the needs of tourists and visitors to the City. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.

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

How the policy works

4.1.43. The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the Community Toilet Scheme. The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

4.1.44. Publicly accessible toilets should be clearly signposted to ensure they are easily found. The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.

4.1.45. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and

family facilities, rather than as a replacement. Where publicly accessible toilets are provided, consideration should be given to the provision of self-contained gender-neutral toilets.

Policy HL7: Sport and recreation

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

Reason for the policy

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

How the policy works

4.1.47. The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by

evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance. The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan.

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

Policy HL8: Play areas and facilities

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

Reason for the policy

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

How the policy works

- 4.1.50. The high rate of development in the City and the creation of new, and improvement of existing, public realm creates opportunities for informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

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

Policy HL9: Health Impact Assessment (HIA)

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

1. requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist;
2. requiring a Rapid or Full HIA to be submitted for larger-scale development proposals.

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

Reason for the policy

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

4.1.53. Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.

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

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

How the policy works

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

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

Desktop assessment

- 4.1.58. This draws on existing knowledge and evidence, often using published checklists which provide a broad overview of potential health impacts. The City Corporation will prepare a Healthy City Planning Checklist for this purpose, which will incorporate relevant elements of TfL's Healthy Streets Check to ensure that land-use and transport impacts on health are considered in a coordinated way.
- 4.1.59. The Healthy City Planning Checklist should be submitted with planning applications for developments of between 10 and 99 dwellings or between 1,000m² – 9,999m² of commercial floorspace. It will also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.

Rapid HIA

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

Full HIA

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

4.2. Safe and Secure City

Context

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

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

- counter terrorism;
- cyber crime;
- fraud;
- vulnerable people;
- roads policing;
- public order;
- violent and acquisitive crime;
- antisocial behaviour.

4.2.3. The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership's vision is for the City of London to be a safe place to live, learn, work and visit. The Partnership meets regularly and publishes a Strategic Plan, which identifies the following outcomes for 2019-2022:

- 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.

4.2.4. 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.

- 4.2.5. 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 and the London Fire Brigade to ensure that the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently.

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).
5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must prepare and submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building.

Reason for the policy

- 4.2.6. 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 between the City Corporation, the City of London Police and the London Fire Brigade, and between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London. Close working with developers and occupiers is also essential.

How the policy works

- 4.2.7. Security and fire safety features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the development process or following completion. Early engagement with the City

Corporation, the City of London Police and the London Fire Brigade is particularly important, including through the pre-application process.

4.2.8. 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.

4.2.9. All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which sets out how the development will address fire safety in the design, construction and operation of the building.

Policy SA1: Crowded Places

All major developments are required to address the issue of crowded places and counter-terrorism by:

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

Reason for the policy

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

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

4.2.12. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach. Other measures that have been taken in the City include the City of London Traffic and Environmental Zone, which is the security and surveillance cordon that surrounds the Square Mile. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City. In 2016, the City

Corporation also approved an Anti-Terrorism Traffic Regulation Order (ATTRO), a counter-terrorism measure that allows the City of London Police to close routes at certain times, specified in the order, and divert vehicles away from the area to deal with identified threats. Its purpose is to avoid or reduce the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism.

How the policy works

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

- assessment of the risk of structural damage from an attack;
- identification of measures to minimise any risk;
- detail on how the perimeter is treated, including glazing;
- consideration of adjacent land-uses and commuter routes.

4.2.14. 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 SA2: Dispersal Routes

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

Reason for the policy

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

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

How the policy works

- 4.2.17. 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 CV4: Evening and Night-time Economy.
- 4.2.18. Major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid over-crowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.
- 4.2.19. 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 SA3: 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

4.2.20. 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

4.2.21. 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.

4.2.22. 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.

4.2.23. 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, through the use of s106 planning obligations.

4.2.24. 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.

4.2.25. 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.

4.2.26. 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.

4.3. Housing

Context

- 4.3.1. Housing is vital for the City's future economy and its communities. A shortage of housing, particularly affordable housing, is one of the main barriers to future business and community growth in the City and across London. High quality, affordable housing is also essential to meet the housing needs of those of the City's communities on lower incomes.
- 4.3.2. The permanent residential population of the City, estimated to be around 8,000, is small in comparison to the daily working population in excess of 520,000. The GLA's 2016-based projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 10,000 by 2036. As the City's housing stock increases the resident population does not increase in proportion as many residential units are used as second homes or for short term letting. The 2011 Census indicated that there were 1,400 second homes in the City of London.
- 4.3.3. The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential areas are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2016. There have also been a number of developments providing shorter term accommodation (short lets or serviced apartments).
- 4.3.4. Most new residential development has been located in or near existing residential areas in accordance with Local Plan policy. This allows greater opportunity to protect residential amenity and deliver a high-quality residential environment. Residential clustering reduces potential conflict with commercial and office uses. There may be occasional opportunities for new residential development on appropriate sites near residential areas, such as through the re-use of heritage assets, where the potential to meet future office needs may be limited by site-specific considerations.
- 4.3.5. References to housing in this Plan include market, intermediate and affordable housing, hostels, sheltered and extra-care housing. It also includes innovative housing products, such as Built to Rent and Co-Living accommodation which are likely to have an increasing role in meeting future housing needs, particularly for City workers at an early stage of their careers. Student housing will contribute towards meeting general housing need at the national ratio of 2.5 student rooms to 1 residential unit.

Housing requirement

- 4.3.6. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing

targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs. The London Plan strategic framework includes Policy SD5, which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context, it requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. The London Plan also includes a target that 740 units should be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period.

4.3.7. Different assessment methods provide different figures for local housing need. The City's 2016 SHMA assessed the level of housing need, including the needs of those requiring supported and specialised accommodation in the City, over the period 2014-36, using the latest population and household projections. The SHMA identified an objectively assessed need for an annual average of 126 dwellings per year. Using the national standard method for assessing local housing need, the City's minimum annual local housing need figure over the ten-year period from 2020 to 2030 would be 112.

4.3.8. The City Corporation provides over 1,500 social housing units on 11 estates outside of the City of London in Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. The City Corporation's Housing Strategy 2019-23 aims to deliver at least 700 new homes on City-owned land and housing estates. Where these homes are outside of the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet address both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a further 3,000 mixed tenure homes on other sites in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs. The City Corporation recognises that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the City's SHMA. This Local Plan therefore seeks to meet the London Plan housing target of 1,460 dwellings.

4.3.9. Housing delivery in the City is impacted by the volatile nature of the wider London housing market. If past volatile trends continue, new housing delivery in the City is likely to fluctuate from year to year and monitoring and delivery performance should therefore be assessed against overall delivery in the period up to 2028/29, rather than on an annual basis. The City Corporation has prepared a Housing Trajectory which shows that the supply of small and larger windfall sites, together with sites in the development pipeline, will provide sufficient capacity to meet the London Plan housing target by 2028/29.

4.3.10. The City Corporation's Article 4 Direction which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, mean that new housing development in the City of London has been delivered through 'windfall' development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to

2021/22, completions and permissions on windfall sites will have delivered an annual average of 198 dwellings per year. It is anticipated that windfalls will continue to deliver the majority of housing. The City Corporation has published a brownfield land register on its website, identifying land that is suitable for residential development in accordance with government requirements.

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

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

Affordable housing

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

Gypsy and traveller accommodation

4.3.14. The London Plan indicates that, in the absence of an up to date local gypsy and traveller needs assessment, boroughs should use the need figure set out in Table 4.4 of the London Plan. This table indicates that there is no need for specific gypsy and traveller accommodation in the City of London. The City Corporation will work with the Mayor and London Boroughs in the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment.

Strategic Policy S3: Housing

The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City's needs, by.

1. Making provision for a minimum of 1,460 net additional dwellings between 2019/20 and 2028/29:
 - encouraging new housing development on appropriate sites in or near identified residential areas;
 - protecting existing housing where it is of a suitable quality and in a suitable location;
 - exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and
 - refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2.
2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by:
 - ensuring the delivery of a minimum of 50% affordable housing on public sector land; and
 - requiring residential developments with the potential for more than 10 units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash-in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and
 - providing a mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.
3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
4. Ensuring that other new land uses within identified residential areas are compatible with residential amenity.
5. Requiring 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 90% of new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

Reason for the policy

- 4.3.15. London has a severe housing shortage caused by a growing population and an inadequate supply of housing units. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still

ensuring that the City remains predominantly a commercial office centre of national importance. New and innovative models of providing housing, including Build to Rent and Co-living, will be encouraged to meet changing housing needs.

- 4.3.16. New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Suitably located housing in the City can address local housing need and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.
- 4.3.17. The London Plan includes a detailed policy which supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting, is typically owned by institutional investors, offers the potential for longer term returns for investors and, importantly, longer lease terms and security for tenants. The City Corporation will support Build to Rent in or near the City's residential areas and where it meets the detailed requirements in the London Plan.
- 4.3.18. The City Corporation considers that there is potential within or near the identified residential areas for Co-living accommodation and will encourage such provision on appropriate sites. Co-living accommodation will typically provide private ensuite bedrooms, shared social spaces and co-working spaces with the latest smart technology. They are often suitable for people at early stages of their career when their ability to afford self-contained accommodation may be limited.
- 4.3.19. Where appropriate, the City Corporation will support the appropriate regeneration of residential estates in the City where it will deliver improved living conditions for existing tenants and provide additional housing to meet housing needs.
- 4.3.20. Many households in London already require accessible or adapted housing to lead dignified and independent lives. More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving to alternative accommodation.

How the policy works

- 4.3.21. To ensure that permissions for new housing are built out in a timely fashion, developers should provide information on the expected completion date for new residential development. The City Corporation will keep this under review and expect developers to liaise with the Corporation where it becomes apparent that anticipated completion dates cannot be achieved.
- 4.3.22. There is a presumption in national policy and the London Plan that new affordable housing associated with housing development should be provided on site. The City Corporation will expect developers to deliver affordable housing in new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable.
- 4.3.23. The City Corporation also requires commercial development to make a financial contribution towards off-site affordable housing delivery instead of delivering mixed

use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.

- 4.3.24. Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace to strengthen its strategically important business role. The City Corporation therefore also works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation-owned housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. Although some affordable housing provision outside the City will continue to be funded by commercial development in the City, the presumption in this Plan is that new housing development in the City should provide affordable housing on site.
- 4.3.25. The London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m². The Mayor has adopted a threshold approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, or 50% on public sector land, are not required to submit viability information. Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses.
- 4.3.26. In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. On public sector owned land, the higher 50% target set out in the London Plan will be applied. The presumption is that affordable housing provision should be made on-site and off-site contributions or cash in lieu contributions will only be accepted in exceptional cases. In exceptional cases where off-site provision or cash in lieu contributions are considered to be acceptable in principle, the provision will be set at a level which captures the full uplift in value when delivering 100% market housing. This will ensure that the development is not more viable when the affordable housing obligation is satisfied through off-site provision or a cash in lieu payment in comparison to on-site delivery. Further guidance on affordable housing requirements, including the methodology for calculating the level of cash-in lieu or off-site contributions required will be set out in the City Corporation's Planning Obligations SPD. This SPD will be kept under review and amended as required to ensure financial contributions are in line with the cost of delivering affordable housing.
- 4.3.27. Developments which propose lower levels of affordable housing, or where a developer considers particular circumstances exist that make a policy compliant scheme unviable, will need to be supported by robust viability assessments. These

assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will commission an independent review of submitted assessments, with the cost being met by the applicant. Consideration of viability and overall levels of affordable housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.

4.3.28. The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. Overpaying for a site will not be regarded as an appropriate justification for failing to meet the affordable housing target.

4.3.29. Where a viability assessment demonstrates that the Plan's affordable housing targets cannot be met, the City Corporation will require an upwards only review mechanism to be included within any s106 planning obligation to ensure that any increases in scheme value or reduction in cost are appropriately reflected in increased affordable housing contributions. The detailed wording and timing of these review mechanisms will be determined on a case by case basis, having regard to the City Corporation's Supplementary Planning Document and Supplementary Planning Guidance prepared by the Mayor in support of the London Plan.

4.3.30. Various types of housing are included within the national definition of affordable housing. The London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes.

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

Policy HS1: Location of New Housing

1. New housing will be encouraged on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential, commercial and other uses will be permitted.

2. New housing must not:

- prejudice the primary business function of the City, or result in the loss of viable office accommodation, contrary to Policy OF2;
- inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
- result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

3. Where existing residential estates are being redeveloped, an increased number of residential units will be expected and the existing affordable housing on-site must be re-provided with at least the equivalent floorspace and tenure of affordable housing. Affordable housing which is re-provided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.

Reason for the policy

4.3.32. The City is a busy and sometimes noisy place, with a high density of development and business activity at all times-during the day and evening, 7 days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because it could have an adverse impact on the City's primary business role and would be likely to have poor residential amenity. The London Plan indicates that residential development is inappropriate in identified parts of the City to ensure that the current and future potential to assemble sites and deliver office development is not compromised by residential development. Elsewhere in the City, offices and other strategic functions of the Central Activities Zone should be given greater weight in planning terms than residential development, except in wholly residential streets or predominantly residential neighbourhoods.

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



Figure 7: Residential Areas

4.3.34. Due to the size and unique character of the City, all new housing has previously come forward on ‘windfall’ brownfield sites through the redevelopment or conversion of existing buildings as opportunities arise. This pattern of housing delivery is projected to continue throughout the life of this new Plan, delivering sufficient new housing over the Plan period to meet London Plan targets. There is no need to allocate sites in the Local Plan to meet housing targets.

How the policy works

4.3.35. To accord with office floorspace policy OF2, applicants proposing redevelopment involving the loss or change of use of existing office accommodation must provide robust evidence to demonstrate that the site is not suitable and viable for longer term office use and the proposal will not prejudice the primary business function of the City. However, the City Corporation will take a more flexible approach to the loss of office floorspace in appropriate circumstances, where development within or near the residential areas will provide additional housing. This could be particularly appropriate where the proposed housing offers Build to Rent or Co-Living accommodation suitable for workers at an early stage of their careers. Further details are set out in the Office Use SPD.

4.3.36. Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted which demonstrates how the development will mitigate the impact of that noise and pollution.

4.3.37. Regeneration of housing estates will often involve the redevelopment of existing homes. Regeneration schemes should deliver an increased number of dwellings, where this is compatible with the delivery of a high quality living environment for existing tenants. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. This will help protect established local communities.

Policy HS2: Loss of housing

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

- they provide poor amenity to residents which cannot be improved; or
- they do not have a separate entrance; or
- exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

Reason for the policy

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

Policy HS3: Residential environment

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

1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity.
2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
3. All residential development proposals must accord with the 'Agent of Change' principle, demonstrating how potential adverse noise impacts on and between

dwelling will be mitigated by layout, design and materials. This principle is applicable when new housing proposals might otherwise constrain existing uses.

4. The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.

Reason for the policy

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

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

How the policy works

4.3.41. The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas. Policy CV4 addresses evening and night-time economy uses, while Policy HL3 seeks to minimise noise and light pollution.

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

Policy HS4: Housing quality standards

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

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

Reason for the policy

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

How the policy works

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

4.3.45. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy HL8. There should be no distinction between amenity spaces and play areas for private and affordable housing residents. Proposals which seek to restrict access to such areas by affordable housing tenants will be refused. Daylight and sunlight to dwellings is addressed in the Design section of the Plan.

Policy HS5: Short term residential letting

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

Reason for the policy

4.3.46. The City of London is primarily a commercial office centre. There is a small stock of permanent residential properties and this stock needs to be maintained and increased to ensure that the City can continue to meet its assessed housing need. Loss of residential accommodation to short-term letting would reduce the overall stock of permanent housing and the City's ability to meet its housing need. At the same time, there is some demand for residential accommodation that can be let on a short-term basis to provide for the needs of the City's business community, particularly for visiting workers. Such short-term accommodation has a role to play but should not be mixed with permanent residential accommodation.

How the policy works

4.3.47. Under the Deregulation Act 2015, short term letting for less than 90 days in a calendar year of domestic premises liable for council tax does not require planning

permission. Letting for periods of more than 90 days in a calendar year would require permission.

- 4.3.48. Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and adversely impacting on the amenity of existing residents.
- 4.3.49. Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy HS1.
- 4.3.50. The provision of short term lets for commercial purposes can help to meet the accommodation needs of business visitors. Such letting can have significant impacts on the amenity of neighbours by reason of noise, disturbance, and occasionally anti-social behaviour. Where such accommodation is proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.
- 4.3.51. The requirement for the provision of affordable housing in Strategic Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

Policy HS6: Student housing and hostels

1. Proposals for new student accommodation and hostels should support the City of London's primary business function and will only be permitted where they do not:
 - prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2;
 - have an adverse impact on the residential amenity of the area; and
 - involve the loss of permanent residential accommodation.
2. Proposals for Purpose-Built Student Accommodation (PBSA) should be supported by identified further or higher educational institutions operating in the City of London or the Central Activities Zone.
3. 35% of student housing on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
4. The loss of existing student housing and hostels to other suitable uses which are in accordance with Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is evidence that student accommodation is impacting on residential or business amenity.

Reason for the policy

- 4.3.52. The demand for student accommodation in London continues to grow. Higher education provision is a key part of London's attractiveness as a World City and

supports the City of London's commercial role. However, opportunities for residential development in the City are limited and student housing may represent an opportunity lost to meet other housing needs in residential areas.

How the policy works

- 4.3.53. New Purpose-Built Student Accommodation (PBSA) should be supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the Central Activities Zone through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation.
- 4.3.54. The Housing Delivery Test establishes a national ratio that every 2.5 student bedrooms in PBSA meet the same housing need as one conventional housing unit and contribute to meeting the City's housing target at this ratio.
- 4.3.55. National space and accessibility standards do not apply to student accommodation but other Plan policies require inclusive and high quality design, which will assist in ensuring the needs of students with disabilities are accommodated.
- 4.3.56. Hostels can contribute to providing accommodation for vulnerable homeless people. The City Corporation's Homelessness Strategy outlines how the Corporation will seek to reduce the incidence of rough sleeping in the City through collaborative working with outreach services, health services, the City of London Police, businesses and others. The Strategy seeks to provide appropriate accommodation options for homeless people, including through the use of s106 contributions to deliver new affordable housing or hostels. Hostels may be acceptable within or near identified residential areas, where the amenity of existing occupiers is protected.

Policy HS7: The Temples

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

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

Reason for the policy

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

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

How the policy works

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

Policy HS8: Older persons housing

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

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

Reason for the policy

4.3.60. The City of London has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for 67 specialist older person units over the life of the Plan, and the London Plan has an indicative figure of 10 units per year.

How the policy works

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

Policy HS9: Self and custom housebuilding

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

Reason for the policy

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

How the policy works

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

5. Support a Thriving Economy

5.1. Offices

Context

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

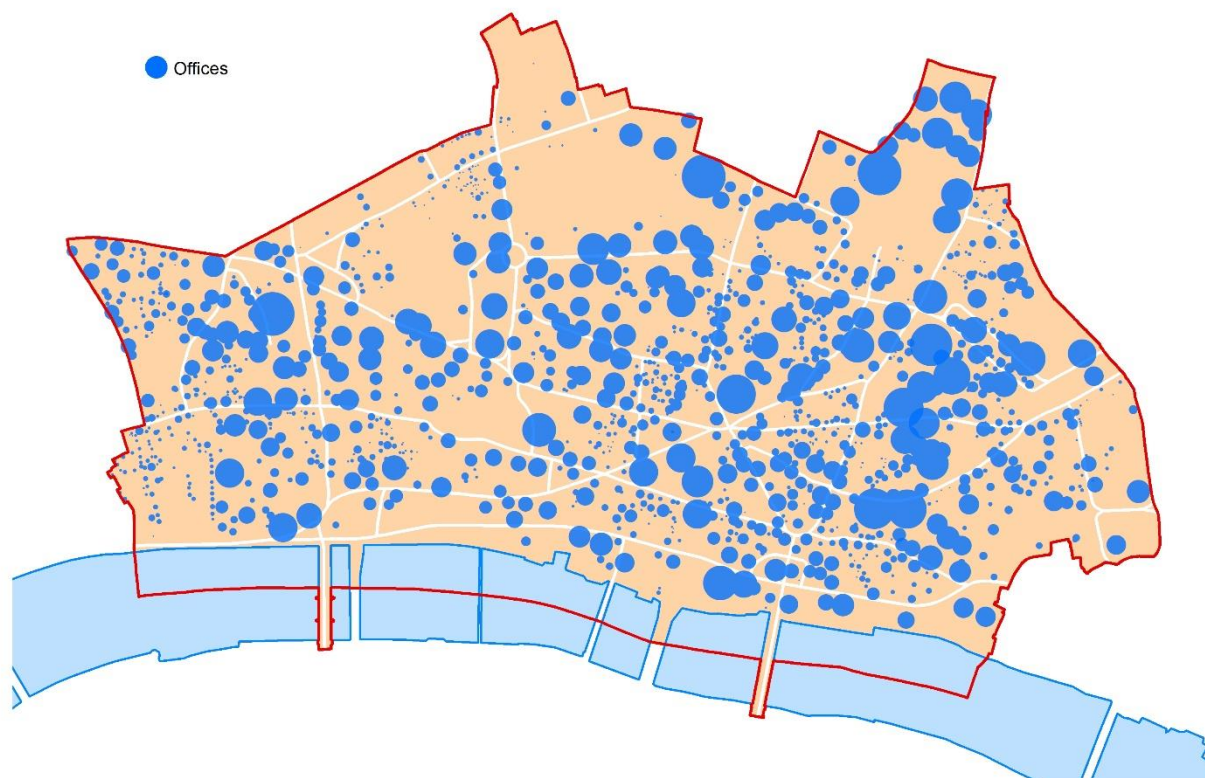


Figure 8 Office distribution

Strategic Policy S4: Offices

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

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

Reason for the policy

- 5.1.7. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 2,000,000m² is derived from the estimated growth in office employment between 2016 and 2036 and represents a 23% increase in floorspace.
- 5.1.8. In 2016, 25% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 28% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. In 2018, there were approximately 41,000 persons in the City employed in Creative Industries. This broader range of occupiers is creating requirements for a broader range of office types.
- 5.1.9. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.
- 5.1.10. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City, but developers are encouraged to consider a range of leasing structures, including below market rents, where appropriate. The City Corporation is working closely with neighbouring boroughs to ensure that affordable workspace and move-on accommodation needs can be accommodated, in particular providing signposting and assistance to businesses in finding suitable office accommodation.

How the policy works

- 5.1.11. Strategic Policy S4 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.
- 5.1.12. The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the Policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first 2

phasing periods. It is expected that 75% of the floorspace target will be achieved by 2026, with the remaining 25% in the later phases.

- 5.1.13. The City Corporation has made an Article 4 Direction removing permitted development rights for the change of use of offices (B1a) to dwelling houses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan.

Policy OF1: Office Development

1. Office development should:

- be of an outstanding design and an exemplar of sustainability; and
- be designed for future flexibility to future proof the City's office stock; and
- provide office floorspace suitable for a range of occupiers; and
- where appropriate, provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.

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

Reason for the policy

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

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

How the policy works

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

Policy OF2: Protection of Existing Office Floorspace

1. The loss of existing office floorspace will be resisted unless it can be demonstrated that:
 - there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months; and
 - refurbishment or re-provision of office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; or
 - the loss of office floorspace is limited to ground or below ground levels and proposed new uses would be complementary to continued office use on upper floors; or
 - The loss of office floorspace is within or near identified residential areas and would result in the provision of additional housing, particularly Build to Rent or Co-living accommodation.
2. Where the above criteria have been met, the loss of office floorspace may be permitted provided that:
 - the proposed development would not compromise the potential for office development on sites within the vicinity and would have demonstrable wider benefits for other objectives of this Plan; and
 - the potential for re-providing a reduced amount of office floorspace within the development has been considered.

Reason for the policy

- 5.1.17. The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the projected increase in employment and office floorspace, it is important to maintain existing office stock whilst accommodating future demand through the provision of flexible floorspace which is suitable for a range of occupiers.
- 5.1.18. The protection of existing offices is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. Proposals involving the loss of office accommodation will need to be supported by robust evidence of marketing and viability to ensure that viable offices can be retained to meet future office need.
- 5.1.19. Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy DE1 and the need to find suitable and sustainable uses for historic buildings. Historic buildings can provide affordable office stock though they have specific constraints and opportunities which may affect the viability of refurbishment.

How the policy works

- 5.1.20. This policy will be applied on a sequential basis. Firstly, proposals need to demonstrate that there is no realistic demand for the existing office accommodation, or for refurbished or re-provided office accommodation on the site, by complying with the criteria set out in Part 1 of the policy.
- 5.1.21. The loss of office floorspace on the upper levels of buildings will require robust evidence to demonstrate why continued office use is not possible. This includes robust evidence of marketing of the building or site for continued office use over a period of at least 12 months. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site over the period. Proposals must provide evidence that the continued office use of the site would be unviable in the longer term.
- 5.1.22. Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances, as set out in Policy PC1. Viability assessments should include the following:
- Site description;
 - A valuation of the building in its existing use unfettered by any hope value;
 - Total costs of maintaining the building as existing and in the future;
 - Costs of refurbishing or redeveloping the building for office use;
 - Information on rents and capital values;
 - Information on current and recent occupation;
 - Target rates of return (internal rate of return or other appropriate measure); and
 - Sensitivity testing to support the robustness of the report conclusions.
- 5.1.23. The change of use of office floorspace at ground and lower ground levels may improve the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. Therefore it will be exempted from the requirement to provide viability and marketing evidence where it does not prejudice the use of the building or site for office purposes.
- 5.1.24. Within or near identified residential areas, the City Corporation may, in appropriate circumstances, take a more flexible approach to the conversion of office floorspace to residential use, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be more complementary to the business City. In such cases, there would be no requirement to provide marketing and viability evidence under Part 1 of the policy.
- 5.1.25. Further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD. Proposals which satisfy Part 1 of the policy will then need to comply with Part 2 of the policy by demonstrating that they

are compatible with the wider objectives of the Plan and would not compromise office development on other sites in the vicinity.

- 5.1.26. Where a proposal results in a reduced amount of office floorspace, account will be taken of the type and size of office floorspace provided and whether there is a specific need for office floorspace of that size and type in the City.

Policy OF3: Temporary 'Meanwhile' Use of Offices

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

Reason for the policy

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

How the policy works

- 5.1.28. 'Meanwhile' uses will be permitted subject to conditions for a maximum of 36 months, after which the use will revert to office use. Applications to extend the period of the 'meanwhile' use or make it permanent will be considered against the criteria in Policy OF2 and will not be permitted unless it is demonstrated that the permanent loss of office floorspace is acceptable.

5.2. Retailing

Context

- 5.2.1. Retailing is important for all the City's communities – but retail demand is largely driven by City workers. This has resulted in a predominantly five-day (Monday-Friday) trading week with footfall concentrated over weekday rush hours and lunch times. The City is, however, becoming a 7 day a week destination, with more retail units catering for a growing weekend and evening trade.
- 5.2.2. There is demand for a better range and quality of retail and leisure facilities. The above average spending power of the City's growing working and residential populations, longer and extended working and trading hours, the increasing number of visitors and the Square Mile's high accessibility by public transport create significant opportunities for improvement to the retail offer.
- 5.2.3. The ways in which people shop and use retail facilities is changing and the City's retail offer needs to adapt to address changing consumer and leisure habits, whilst also retaining a focus on centres as places to shop. Retail centres that provide a diverse range of shops, services and leisure activities are likely to be in a better position to respond to changing retail demand. In the City, as elsewhere, there has been an expansion of leisure and entertainment uses, which can increase footfall at different times of the day and add to the visitor experience. Such uses are an important component of the City's overall retail mix.

Strategic Policy S5: Retailing

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

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

5. Giving greater priority to shops (A1 uses) within the PSCs, with a broader mix of retail and appropriate town centre uses on the peripheries of the centres and the Retail Links.
6. Supporting the provision of retail and other town centre uses that provide active frontages at street level across the City where they would not detract from the viability and vitality of the PSCs and the Retail Links.

Reason for the policy

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

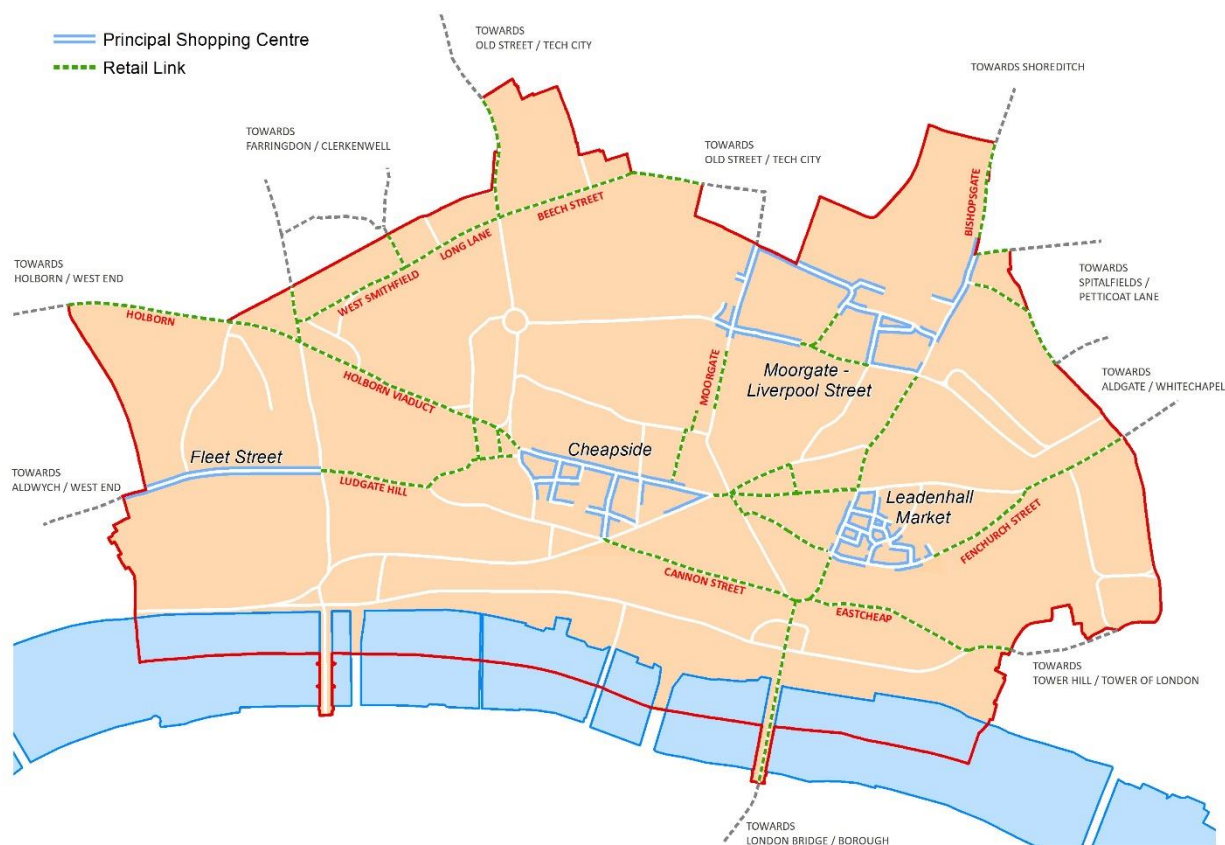


Figure 9: Principal Shopping Centres and Retail Links

How the policy works

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

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

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

provide an active frontage. Retail uses may be permitted on upper floors of major commercial developments, including in tall buildings, where they provide additional facilities which are accessible to the public and office occupiers.

Policy RE1: Principal Shopping Centres

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

Reason for the policy

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

How the policy works

- 5.2.12. The net loss of ground floor A1 uses within the PSCs will be resisted. The net loss of other retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will also be resisted. Exceptionally,

permission may be granted for non-retail, appropriate town centre uses, such as leisure in the PSCs, providing these are complementary to the core retail offer and incorporate active frontages with an element of retail sales space. A1 units at upper floors and basement levels may contribute to the retail provision of PSCs.

However, it is recognised that pressure on ground floor shop units may be reduced by locating other retail and town centre uses at non-ground level. Change of use from shops to other retail or town centre uses at upper floors or basements will be assessed in relation to the contribution the unit makes to the character of the PSC and the effect of the proposed entrance and use on the ground floor frontage.

5.2.13. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, whilst retaining a predominance of A1 uses. Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.

5.2.14. Each PSC in the City has an individual character, described below, which will be considered in the implementation of policy.

Cheapside

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

Fleet Street

5.2.16. Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers and residents with a limited number of premises open in the evenings or at weekends. The PSC has a linear form and the busy road creates a poor environment and acts as a barrier to pedestrian permeability. Improvements to the public realm would help to improve the environment and the visitor and shopper experience. The current retail stock is largely A1 food retail, and there is an opportunity to capitalise on the comparatively lower rents. Fleet Street's outstanding heritage offers opportunities to develop a more distinctive retail mix in this PSC. There is some capacity for additional retail provision between Fleet Street and Holborn and there is scope to strengthen retail links with Cheapside.

Leadenhall Market

5.2.17. Leadenhall Market PSC is centred on the iconic Victorian market building but includes several surrounding streets. The PSC is located within the southern part

of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The historic Grade II* listed market building is a tourist destination and so evening and week-end trading is encouraged. The character and significance of the historic market will be maintained and enhanced as a visitor and retail destination, supporting a flexible range of retail uses with an emphasis on food and beverage. Increased demand arising from the expanding City Cluster workforce will be met through larger, modern units in the surrounding streets which act as gateways to the market. Additional retail will be provided by active retail frontages to new office development in the area.

Moorgate/Liverpool Street

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

Policy RE2: Retail Links

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

Reason for the policy

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

How the policy works

5.2.20. The Retail Needs Assessment identified the need for approximately 85,000m² of additional retail floorspace in the 'rest of the City' outside the PSCs. The Assessment highlighted two areas that should be a priority for new floorspace outside the PSCs: Farringdon/Culture Mile and Eastcheap/Monument. Delivery of new retail floorspace at Eastcheap/Monument could help to meet some of the demand arising from office development in the City Cluster which cannot be accommodated within the Leadenhall Market PSC and would provide more vibrant links towards the Pool of London.

5.2.21. While the Retail Needs Assessment concluded that the Retail Links continue to play an important role in meeting demand, it advocated a different occupier mix in these areas compared to the PSCs in order to avoid drawing visitors away from the prime PSC streets. Comparison goods shopping should continue to be focused in the PSCs to maintain the health of the City's core retail offer.

5.2.22. While the mix of uses in the Links should include A1 shops, a variety of other retail and town centre uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through litter, noise, disturbance and odours. All proposals for change of use in the Retail Links will be required to incorporate active frontages at street level.

Policy RE3: Ground floor retail provision elsewhere in the City

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

- include active frontages onto the street;
- do not impact adversely on the amenity of residents, workers and visitors;
- do not impact adversely on the operation of office premises; and
- would not adversely affect the vitality and viability of the PSCs or Retail Links.

2. The loss of A1 units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.

Reason for the policy

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

How the policy works

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

Policy RE4: Specialist Retail Uses

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

Reason for the policy

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

How the policy works

5.2.26. The City Corporation will resist proposals which result in the permanent loss of specialist retail uses, unless it can be demonstrated that such uses are no longer required or can be re-provided on a suitable, alternative site which retains any historical or cultural significance. The replacement of specialist facilities on the same site will be required where they are impacted by development proposals.

Policy RE5: Markets

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

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

Reason for the policy

5.2.27. There is an increasing demand for temporary retail pop-ups and street food markets, such as the Guildhall Yard Lunch Market, which can support the local economy by generating increased vibrancy, retail diversity and footfall. These uses provide greater retail choice, enliven the public realm and increase the attractiveness of the City as a place to live, work and visit.

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

5.2.29. Temporary street trading, where permitted under the Various Powers Act, can operate for up to 14 days in a calendar year under permitted development rights. Trading for longer periods will require planning permission. Market trading off City

streets but within the curtilage of a building will similarly require planning permission if undertaken for a period of more than 14 days in a calendar year.

How the policy works

5.2.30. Proposals for markets or temporary retail pop-ups located within a building or its curtilage, should be ancillary to and complement the main use of the site. When assessing proposals for new markets and pop-ups, the City Corporation will consider the potential for significant adverse impacts on existing retail centres within the vicinity together with impacts on the amenity of nearby residents or business occupiers, on pedestrian and vehicular movement or on open spaces.

5.3. Culture, Visitors and the Night-Time Economy

Context

- 5.3.1. London has long been recognised as one of the world's great cultural cities. The City of London contains a huge concentration of arts and cultural facilities, which contribute to its uniqueness and complement its primary business function. These facilities include galleries, theatres, museums, heritage attractions, Livery Halls, libraries, places of worship and concert halls. In recent years a growing number of night-time entertainment facilities such as clubs, bars and event venues have located in the City, alongside the traditional historic public houses. Research undertaken for the City Corporation shows that growth in creative industries in the City between 2010 and 2016 has outpaced growth elsewhere in London and the UK.
- 5.3.2. The City's cultural offer is an integral element of the Square Mile, alongside the business City. The Barbican is identified as a strategic night-time location of national or international significance while Cheapside and Liverpool Street are identified as night time areas of more than local significance in the London Plan. The City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section.
- 5.3.3. The City Corporation has prepared Visitor and Cultural Strategies that promote the City as a high-quality visitor destination with an emphasis on world-class cultural facilities. It is estimated there are approximately 21.5 million business and leisure visits a year to the City and this is expected to grow as a result of an increased cultural offer and improvements to transport accessibility such as the Elizabeth Line and Bank Station upgrade. Suitable facilities and hotel accommodation are required to provide visitors with a pleasant experience whilst in the City.
- 5.3.4. Cultural and creative activity can contribute significantly to the quality of the environment and cultural experience, particularly where it enhances a sense of place. Public art can give visual pleasure and help to re-establish local identity and sense of place.

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

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

- Providing, supporting, encouraging access to and further developing a wide range of cultural facilities across the City, and delivering a major destination for culture and creativity in the north west of the City through the Culture Mile initiative.
- Requiring developers to submit Cultural Plans for major development outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer.

- Protecting and enhancing existing cultural buildings and facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City.
- Supporting the development of creative enterprise through appropriate workspace and digital infrastructure, particularly within Culture Mile.
- Allowing hotel development where it supports the primary business or cultural role of the City, and refusing new hotels where they would compromise the City's business function or the potential for future business growth.
- Enabling a vibrant evening and night-time economy, while ensuring that operators proactively manage night-time entertainment premises to minimise potential impact to residents and workers.
- Maintaining the City's existing collection of public art and culturally significant objects and pursuing opportunities to commission new, high quality pieces in appropriate locations.
- Maintaining and enhancing the City's open spaces and/or streetscape to accommodate cultural events and activities that are accessible to all City communities and which celebrate the City's unique cultural offer.

Reason for the policy

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

5.3.6. The City Corporation's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. Culture is seen as being for everyone and is a driver of social mobility.

How the policy works

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

5.3.8. Developers will be required to submit Cultural Plans as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating

public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.

Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities

1. The City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless:
 - replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities; or
 - the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
 - it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, arts or cultural use at reasonable terms for such a use.

Reason for Policy

5.3.9. The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition for buildings and sites from commercial uses in the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed, before a site will be allowed to change use.

5.3.10. There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches and specialist retail premises such as the Silver Vaults in Chancery Lane.

How the policy works

5.3.11. Applicants will be required to demonstrate that an existing visitor, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use). Marketing will not be required if it can be

demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.

5.3.12. The City Corporation has published guidelines for determining nominations for Assets of Community Value in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest. In determining whether a public house has heritage, cultural, economic or social value, the City Corporation will have regard to those guidelines as well as the characteristics outlined in the London Plan.

Policy CV2: Provision of Visitor Facilities

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

- seating and tables;
- structures and landscaping to enable children's play and provide facilities for school groups;
- suitable shelter from weather conditions;
- well-designed public convenience provision, including changing places toilets, accessible to all users;
- well-designed signage, way finding and links to visitor facilities and destinations;
- temporary pop-up art installations in appropriate locations;
- performance spaces and animation of key routes where appropriate.

Reason for the policy

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

How the policy works

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

Policy CV3: Hotels

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

- do not result in the loss of viable office accommodation for which there is continuing need, as set out in Policy OF2;
- do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- include a range of complementary facilities accessible to the public;
- provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage, and taxis, appropriate to the size and nature of the development;
- are inclusive, meeting London Plan accessibility standards for new hotel bedrooms;
- ensure continuing beneficial use for historic buildings, including enhanced public access to and interpretation of that heritage, where appropriate;
- address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).

Reason for the policy

5.3.15. While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in 2019 had 38 hotels, apart-hotels and hostels, providing 6,100 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. This demand is driven by a projected increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City's projected share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement.

5.3.16. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for business accommodation is likely to increase. Visitor numbers are projected to increase, and the development of Culture Mile is likely to increase demand for hotel accommodation particularly in the north west of the City.

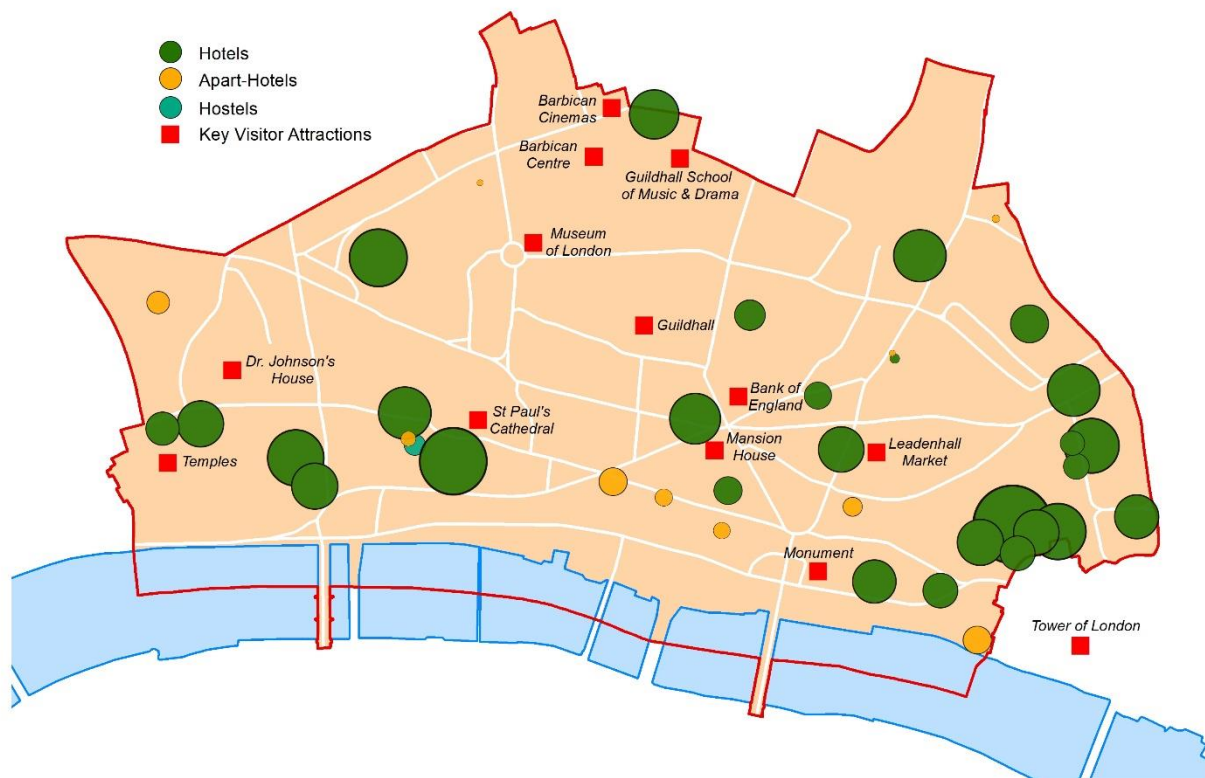


Figure 10: Hotel and visitor attractions distribution

How the policy works

5.3.1. Policy CV3 applies to hotels, apart-hotels and serviced apartments.

5.3.2. Hotel development should not prejudice the primary business function of the City by displacing sites that are suitable for office accommodation. Hotel proposals will need to demonstrate that there would not be a loss of suitable and viable office floorspace, in accordance with Policy OF2 and the Office Use SPD.

5.3.3. Hotel development may be suited to listed buildings, providing an alternative use which could enable significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved public access to and interpretation of the building's heritage.

5.3.4. Hotels can cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers. Where new hotels are considered to be acceptable, they should enable the public to access facilities such as co-working space, meeting rooms, restaurants or leisure facilities in order to bring the maximum benefit to the City's communities.

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

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

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

5.3.7. For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and may prejudice the business City and put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

Policy CV4: Evening and Night-Time Economy

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

Reason for policy

5.3.8. Evening and night-time entertainment is becoming an important part of the City's economy, bolstered by London's move toward becoming a 24-hour destination, growing numbers of workers and visitors and the encouragement of arts and culture in the City. Expansion of the City's evening and night time offer will be encouraged where it is compatible with neighbouring uses. Night-time entertainment has the potential to cause noise disturbance to nearby residents as well as other impacts such as anti-social behaviour, litter and odours. These adverse impacts need to be mitigated.

5.3.9. Anti-social behaviour can potentially be reduced by providing a broad range of evening and night-time activities that appeal to different customers, rather than concentrating one type of use in a particular area. This includes extending the opening hours of existing day-time facilities such as shops, cafes and leisure facilities, which can promote customer cross-over and create bridges between the daytime and night-time economy.

How the policy works

5.3.10. The City Corporation will require the development responsible for change to manage the impact of that change – the 'Agent of Change' principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.

5.3.11. Night-time entertainment uses in the City include restaurants and cafes (A3), drinking establishments (A4), hot food takeaways (A5) and other related uses including, for example, a nightclub or a mix of such uses. They form part of the City's wider night-time economy.

5.3.12. The management of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance.

5.3.13. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment. This is supported by the City Corporation's Code of Good Practice for Licensed Premises. The City Corporation's Noise Strategy sets the strategic direction for noise policy within the City of London and

outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.

- 5.3.14. The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in disturbance and nuisance from excessive noise, particularly from people drinking and smoking outside, and arriving or leaving. Policy SA2 (Dispersal Routes) requires applications for night-time uses to include Management Statements setting out proposals for the dispersal of patrons.
- 5.3.15. All planning applications for A3, A4, A5, and related, uses should include information stating the proposed hours of operation. The City Corporation may impose conditions requiring the closure of the premises between the hours of 11pm and 7am where appropriate. such as near noise sensitive uses.
- 5.3.16. Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are expected to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. Policies HL3 and HS3 deal with noise and light pollution, and the residential environment respectively.
- 5.3.17. Proposals for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:
- hours of closure to protect amenity;
 - noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as soundproofing, noise controls and double entry lobbies;
 - the dispersal of patrons so as not to cause disturbance to residents;
 - arrangements for the storage, handling and disposal of waste;
 - a timed programme for deliveries and collections and other servicing arrangements;
 - measures to deal with the emission of odours; and
 - location of ventilation ducts and plant.
- 5.3.18. Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule. It is recognised that it may

not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers are known.

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

Policy CV5: Public Art

1. The City's public realm and distinctive identity will be enhanced by:
 - encouraging the provision of new artworks in appropriate locations in the City on public and private land;
 - protecting existing works of art and other objects of cultural significance;
 - ensuring that financial provision is made for the future maintenance of new public art;
 - requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.
2. The location of new and relocated artworks must take into consideration the health and safety of pedestrians, particularly those with disabilities, and other highway users.

Reason for the policy

- 5.3.20. Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place and local identity and is a form of community infrastructure. Public art includes temporary installations and non-physical works such as soundscapes. Where appropriate, artworks can be multi-functional so that a variety of community needs can be met. Artworks may provide shelter from the weather, include sensory elements and provide play opportunities. There are several arts events held regularly in the City including "Sculpture in the City" which forms a free public trail of works of art throughout the City.
- 5.3.21. The proposed public art must respect, and not detract from, the surrounding environment. Objects of cultural significance may include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.

5.3.22. Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided, and consideration given to ensuring that people with visual or mobility impairments are not placed in danger. Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers.

How the policy works

5.3.23. The City Arts Initiative (CAI) group advises the City Corporation on the artistic merit, siting, setting and appropriateness of public art proposals in the City. Temporary works of art (in situ for less than 8 weeks), which do not require planning permission, will be considered by the CAI group.

5.3.24. Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design of development and applicants should work with artists at an early stage of design. Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal agreement. Where works of art are on private land, it is expected that those pieces will be maintained to a high standard by the landowner. The City Corporation may seek contributions through s106 obligations towards the provision of new public art and the future maintenance of public art.

5.4. Smart Infrastructure and Utilities

Context

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

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

Strategic Policy S7: Smart Infrastructure and Utilities

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

Reason for the policy

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

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

How the policy works

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

Policy IN1: Infrastructure provision and connection

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

4. Development should aim to avoid reducing mobile connectivity in surrounding areas, and if that is not possible suitable mitigation measures will be required. Provision should be made on buildings or in the public realm to accommodate well-designed and located mobile digital infrastructure.

Reason for the policy

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

How this policy works

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

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

Policy IN2: Infrastructure Capacity

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

Reason for the policy

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

How this policy works

5.4.14. The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and should include evidence of engagement with providers.

5.4.15. Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote and contribute towards a low-carbon based economy, through smart buildings and incorporating alternative solutions into the design. It will be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure, which may involve studies being undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.

5.4.16. Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in under-utilisation of infrastructure. The cumulative impacts should be considered through discussion with providers and pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.

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

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

Policy IN3: Pipe Subways

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

Reason for the policy

5.4.19. Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways would provide greater capacity for pipes and cables, reducing the need for street works which often cause disruption. Pipe subways accommodate gas and water mains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then not easily accessible.

How the policy works

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

6. Shape Outstanding Environments

6.1. Design

Context

- 6.1.1. The built environment of the City of London has a unique and distinctive character. Arranged on a predominantly medieval and Roman street pattern, high quality historic and modern buildings and urban green spaces create a rich visual landscape of building types, materials and architectural design. The City of London has a nationally and internationally renowned townscape. The City has been a centre for international trade for centuries and this long history of commercial activity and its modern role as a world-leading financial and professional services centre is reflected in the design of the buildings and their activities.
- 6.1.2. The demand for additional office floorspace and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape which presents challenges and opportunities to ensure that new development delivers good growth. Innovative and creative solutions are required to optimise the use of land as a scarce resource, while creating architecture of a world class standard which enhances the City's rich character.
- 6.1.3. To realise the City Corporation's vision for the Square Mile, the design of the built environment should contribute towards the delivery of a competitive and creative City with exemplars of sustainable building design. Development should contribute towards the aim of achieving a zero emission and climate resilient City by 2050 in accordance with the London Plan.

Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces., Design solutions should make effective use of limited land and contribute towards well-being and a greener, zero emission City, through development which:

Form and Layout

1. Optimises pedestrian movement by maximising permeability, providing external and internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
2. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;
3. Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter roof terraces and spaces, including in tall buildings and along the river and around City landmarks;

4. Delivers world class sustainable buildings which are mixed-use, adaptable, adopt circular economy principles and contribute towards a zero emission, zero carbon and climate resilient City.

Experience

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

Quality and character

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

Reason for the policy

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

How the policy works

- 6.1.5. To create a zero-emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.
- 6.1.6. The City of London will continue to be at the forefront of delivering the highest and most sustainable design standards. All development should demonstrate how it delivers the highest standard of design while also respecting its surroundings and the unique character and history of the City. Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. The diversity of the townscape means that different design considerations apply to each site and these need to be carefully assessed to take account of each building's context. This should not constrain design approaches, and a range of solutions may be appropriate. Liaison with the City Corporation, the City of London Police and the London Fire Brigade is essential at an early stage of design to ensure that buildings and spaces are safe and secure and reduce the potential for anti-social behaviour.
- 6.1.7. The City Corporation will use a variety of modelling techniques to assist in the determination of planning applications. Developers will be required to use modelling techniques to demonstrate compliance with the City Corporation's microclimate and thermal comfort planning advice notes. The City Corporation will use 3D digital modelling technology to assist in considering the visual impact of development, enabling an assessment to be made of the impact of development on townscape and skyline. Developers will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology.
- 6.1.8. The City has a large workforce whose numbers are expected to grow substantially. Most journeys within the Square Mile are on foot and pedestrian movement is particularly high during morning and evening peak times. The City has retained much of its historic street pattern, which provides convenient walking routes and allows for a high degree of pedestrian permeability. The City Corporation uses pedestrian modelling to better understand pedestrian flows and to manage the impact of proposed new development.
- 6.1.9. The City has numerous small open spaces, which provide valuable amenities, many of which are of historic importance. The design of these small spaces requires innovative and sensitive design solutions which respect their character and setting and create high quality, accessible areas for all the City's communities. The City's streets provide space for public enjoyment, and the City Corporation has a programme of public realm enhancement projects to improve the quality, sustainability, inclusivity and amenity of the public realm.
- 6.1.10. The City provides significant employment, residential and leisure opportunities that should be accessible to all. Accessibility to new and existing buildings and spaces must create an inclusive environment. Adaptation of historic buildings

requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and will prepare further guidance for developers.

Policy DE1: 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” 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.

Reason for the policy

6.1.11. The drivers for sustainable development are increasing, affecting global and local businesses, workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City’s priorities:

- Energy, carbon emissions and air pollutants – reducing emissions and moving to a zero emission and zero carbon city by 2050, in line with London Plan requirements;
- Water – reducing water use in an area of serious water stress;
- Pollution – reducing exposure to poor air quality;
- Materials – retaining embodied carbon in existing buildings and materials and improving resource efficiency.

6.1.12. Social and environmental responsibility is high on the agenda for many City businesses and their workforce and a working environment that supports these goals is essential for the City’s future. The London Plan provides a framework for driving forward this agenda but it needs to be implemented at a local level.

6.1.13. The City of London Zero Emissions Study 2018 provides evidence for the trajectory to a zero emissions City. The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen infrastructure are highlighted as essential elements of a future zero emissions City,

where decarbonised electricity, that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides. Therefore connection to these networks is expected wherever feasible, subject to appropriate decarbonisation plans.

6.1.14. The City Corporation is developing a Climate Action Strategy which will set out a trajectory towards zero carbon in the City of London, and actions required to ensure that the City is resilient to the impacts of climate change. The application of sustainability standards through this Plan will contribute to the achievement of these objectives.

How the policy works

6.1.15. The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are subject to this policy where proposed works constitute development. Refurbishments bring the benefit of re-using some of the existing building's embodied carbon. Standards required are those that are in place at the time of submission of a planning application.

6.1.16. Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development. For major development the Sustainability Statement should include:

- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
- an energy assessment in line with the Mayor's Energy Planning Guidance. Where carbon offsetting is required this will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects in the City or elsewhere.
- an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
- details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.

Extensions:

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

For minor development

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

Policy DE2: New Development

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

- security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design;
- opportunities are taken to enhance the appearance of the roofscape.

Reason for the policy

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

How the policy works

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

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

6.1.20. The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated into the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.

6.1.21. In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Blank frontages and ventilation louvres should be avoided. Ventilation louvres, where necessary, should

be located away from busy streets. Servicing entrances should be carefully designed to minimise adverse effects on the townscape.

- 6.1.22. Buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs. Proposed uses must not rely on the use of space in the public realm, including the use of public highway.
- 6.1.23. The City of London has many public and private viewing galleries, terraces and tall buildings, meaning that many workers, residents and visitors see the townscape from above. Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the building as viewed from surrounding buildings as well as from the ground. The potential to add visual interest to a roofscape, including greening, should be designed in from the outset.
- 6.1.24. Plant should be located below ground. Where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants. Consideration should be given to the use of external heating and cooling supplies from district heating and cooling networks, such as the Citigen network, where available, as these may avoid or reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms, as well as providing wider environmental benefits.
- 6.1.25. Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas. Gates and doors should be well designed and should be kept closed when the entrance to the service bay is not in use.
- 6.1.26. Ventilation or extraction systems should be routed internally and extensive or unsightly external ducting will not normally be permitted. Provision must be made within the building for services and ducting to and from all uses. Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, developers and/or occupiers should investigate the potential to vent emissions to the roof. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways. Developments should

incorporate suitable off-street facilities for smokers wherever possible to avoid the need for smokers to congregate on the pavements.

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

6.1.28. Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development.

Policy DE3: Public Realm

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

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

Reason for the policy

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

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

How the policy works

- 6.1.30. The City Corporation will undertake public realm enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the Community Infrastructure Levy and funding from external sources to deliver enhancement works.
- 6.1.31. All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City. Consideration should be given to design features which prevent damage from the activities of skaters, such as metal studs incorporated into street furniture and hard surfaces. Designs should be robust and durable and use sustainable and low carbon materials.
- 6.1.32. The incorporation of artworks or integral decorative features, such as sculptures, fountains and schemes included in the City Arts Initiative, to create animated spaces, will be encouraged. Early consideration of their design, management and maintenance regime is required. Detailed guidance is provided in Policy CV5.
- 6.1.33. Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, and the Mayor of London's Streetscape Guidance.

Policy DE4: Pedestrian permeability

1. Improved way-finding will be sought through public realm improvements. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:
 - providing legible, good quality, safe and low pollution pedestrian connections between spaces;
 - providing new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;
 - providing publicly accessible ground floors for improved pedestrian movement, where feasible;
 - providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.
2. Developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest.

Reason for the policy

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

How the policy works

- 6.1.36. In order to reduce pedestrian congestion and improve pedestrian access through the public realm, new pathways for moving through the City will need to be created or re-established. Spreading the footfall across a wider area will help to create a more vibrant and comfortable street network.
- 6.1.37. Development will be expected to deliver net gains in the public realm, through the establishment of new pedestrian routes around and through buildings, having regard to the cumulative impact of their development alongside existing and permitted development on the capacity of pedestrian routes. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected and permeability of the City compromised. The City Corporation has developed a block size analysis which identifies large impermeable street blocks across the City in order to prioritise the identification of new pedestrian routes through development proposals. Over the Plan period the aim is to reduce the proportion of larger street blocks (shown in blue on Figure 11) and to increase the proportion of smaller blocks.
- 6.1.38. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

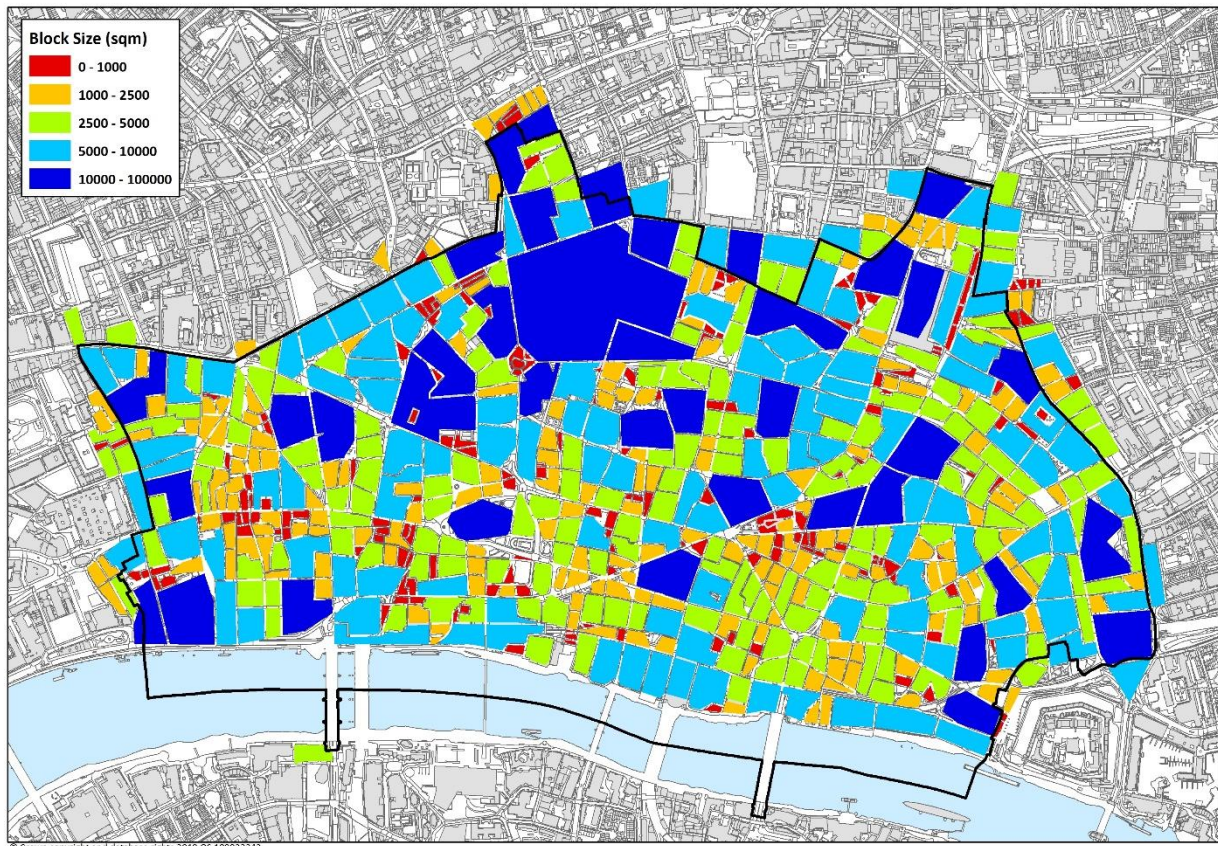


Figure 11: Block Size Analysis

Policy DE5: Terraces and Viewing Galleries

1. Roof terraces will be encouraged where:

- 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 can be retained and enhanced;
- there would be no adverse impact on protected views;
- the design and layout of the terrace optimises the potential for urban greening;
- emissions from combustion plant will not affect users of the 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.

Reason for the policy

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

How the policy works

6.1.40. The City Corporation encourages proposals for roof gardens and terraces where they are sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive and where they do not impact adversely on residential amenity. There should be no impact on strategic or locally protected views.

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

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

Policy DE6: Shopfronts

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

- respect the quality and architectural contribution of any existing shopfront;
- maintain the relationship between the shopfront, any fascia, the building and its context;
- use materials which are sympathetic to the wider context and are of high quality;

- ensure that signage is in appropriate locations and in proportion to the shopfront;
- take into account the impact of louvres, plant and access to refuse storage;
- ensure that awnings and canopies are positioned only in locations where they would not harm the appearance of the shopfront, obstruct architectural features or views and are in compliance with highway requirements;
- avoid openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity of the area;
- avoid external shutters and contain alternative security measures, where required;
- avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
- ensure that the design is inclusive incorporating level entrances and adequate door widths;
- ensure that internal shop lighting does not create inappropriate light spillage into the public realm.

Reason for the policy

- 6.1.43. Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.
- 6.1.44. Existing shopfronts should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

How the policy works

- 6.1.45. New shopfront proposals should relate to the upper floors of the building and surrounding buildings, providing consistency with neighbouring premises, where appropriate. New shopfronts should utilise high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth), which are out of proportion or scale with the shopfront or have a detrimental visual effect on the building or the street scene.
- 6.1.46. Modification to shopfronts and shopfront designs to incorporate louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building where they cannot be accommodated in less sensitive elevations. Awnings and canopies, where appropriate, should be integrated into the shopfront design in relation to size, location and materials.

- 6.1.47. Fully openable shopfronts and large serving openings may be refused where they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.
- 6.1.48. Required security measures should be internal to limit their visual impact on shopfronts. External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts. Internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.
- 6.1.49. Retail entrances should be designed with level entrances to enable inclusive access by all. Other measures and movable ramps should be used exceptionally where level entrance is not feasible.

Policy DE7: Advertisements

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

Reason for the policy

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

How the policy works

- 6.1.51. Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the character of the City. The display of advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however, provide an opportunity to add interest to the street scene by including images and information about the development under construction. Further guidance is contained in the City Corporation's Hoardings Advice Note.
- 6.1.52. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where

appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.

- 6.1.53. Particular care will be necessary with advertisements on or in the setting of listed buildings and within conservation areas. Internal illumination of advertisements in such areas will not normally be permitted.
- 6.1.54. Advertisements above ground level are detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features and the City's streetscape and skyline. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 6.1.55. Appropriate action will be taken to have unauthorised advertisements removed. The City Corporation's Transport Strategy requires that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

Policy DE8: Daylight and sunlight

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the Building Research Establishment's guidelines.
2. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.
3. Development should incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and public realm.

Reason for the policy

- 6.1.56. The City is an urban centre with a very high density of buildings, resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.

How the policy works

- 6.1.57. The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely

developed city-centre locations. Given the importance of the City's open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. Developers will be required to submit daylight and sunlight assessments in support of their proposals. The City Corporation may require independent verification of these assessments at the developer's expense.

- 6.1.58. When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. The City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site as well as the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. The Mayor of London has indicated that guidance on daylight and sunlight standards will be produced to support the London Plan.
- 6.1.59. Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered beneficial in the public interest and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

Policy DE9: Lighting

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

Reason for the policy

- 6.1.60. The City Corporation's Lighting Strategy contributes to the City's wider aims of improving the night-time offering and creating an after-dark street experience that befits a world class business and cultural centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.

6.1.61. Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes can improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light spillage concerns for neighbouring residents with a potential impact on wellbeing. Avoidance of light spillage onto urban green spaces is crucial for biodiversity.

How the policy works

6.1.62. The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it enhances the overall experience of this unique area and provides orientation and wayfinding after dark.

6.1.63. The Illuminated River art project, to be implemented fully by 2022, will enhance the visual impact at night time through lighting of all 5 bridges located in the City. This will be complemented by a reduction in street lighting on the bridges.

6.1.64. The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting of historic buildings and limit adverse effects upon adjacent areas, uses and biodiversity.

6.1.65. There is potential for badly designed lighting schemes to generate light pollution with adverse impacts on neighbours and the natural environment, as well as incurring unnecessary costs for the occupier. The design of lighting schemes should be considered at an early stage in the development design process, having regard to the City of London Lighting Strategy. Developers should submit a Lighting Strategy with their planning application if a proposal includes the installation of external lighting or light spillage into the public realm.

6.1.66. The City Corporation will prepare further planning guidance to assist developers in the design of appropriate lighting schemes. Detailed information on requirements for lighting can be found in the City of London Lighting Strategy.

6.2. Vehicular Transport and Servicing

Context

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

Strategic Policy S9: Vehicular Transport and Servicing

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

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

Reason for the policy

6.2.6. The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. 93% of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The City is already a highly sustainable location, and the opening of the Elizabeth Line will result in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with

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



Figure 12: Rail and underground network

Movement function	Street Hierarchy
Through traffic – the preferred streets for motor vehicles that do not start or finish their journey in, or immediately adjacent to, the Square Mile.	London Access streets (TfL network)
Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access streets
Access – used for the first or final part of a journey, providing access to properties.	Local Access streets

Table 3: City of London street hierarchy

6.2.7. The City's Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places.

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



Figure 13: City of London Street Hierarchy

How the policy works

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

6.2.10. Achievement of the targets is dependent on measures introduced by the Mayor of London and TfL, such as the Central London Zero Emission Zone, although the City Corporation will explore specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.

- 6.2.11. The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 6.2.12. The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
- 6.2.13. The City Corporation will require developers and occupiers to minimise the impact of freight and servicing trips through measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.
- 6.2.14. Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City's streets.

Policy VT1: The impacts of development on transport

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

Land Use	Thresholds
Offices	1,000m ²
Residential	10 units
Retail	1,000m ²
Hotel	10 bed spaces
Health	1,000m ²
Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m ²

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

Reason for the policy

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

How the policy works

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

- road danger;
- pedestrian environment and movement;
- cycling infrastructure provision;
- public transport; and
- the street network.

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

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

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

Policy VT2: Freight and Servicing

1. Applicants should consult with the City Corporation on matters relating to servicing at an early design concept stage. Development should be designed to provide for on-site servicing, wherever practicable.

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

Reason for the policy

- 6.2.20. The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles. The City Corporation is working with local employers to support them in freight consolidation and to share best practice and ideas, for example through the Cheapside Business Alliance and the Active City Network.
- 6.2.21. Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of different forms of consolidation, including 'virtual' as well as physical consolidation, will be required to minimise the number of trips required to service a development during construction and operation. Virtual consolidation involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building. Opportunities to trial and support freight innovation through new technology will be explored as part of the City Corporation's Future City Streets programme.

- 6.2.22. Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's Transport Strategy outlines the Corporation's intention to work with a partner haulier to provide a consolidation service for the City of London by 2022 and to establish a sustainable logistics centre to serve the Square Mile by 2030. This centre would co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriering services. It would be supported by last mile logistics hubs within the City to facilitate more deliveries on foot, by bike and by small electric vehicles.
- 6.2.23. Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles. To reduce emissions from delivery vehicles, electric vehicle charging points will be required within service areas for freight vehicles.
- 6.2.24. On-street shredding operations associated with building occupation creates noise and congestion on street and can have an adverse impact on the amenity of neighbouring uses.

How the policy works

- 6.2.25. Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom should be provided of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas.
- 6.2.26. Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m² and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. Where consolidation of servicing and deliveries is proposed, the number of vehicle trips that have been avoided as a result should be set out in the DSP. Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP. Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSPs should take account of the City's street hierarchy when considering routeing arrangements and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries. The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. The City Corporation will work with developers

and occupiers to monitor the actual reductions in deliveries achieved through consolidation.

6.2.27. Out of hours servicing is required, except in residential areas where night-time deliveries should be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing.

6.2.28. Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP. Where appropriate, construction deliveries may be accepted outside of normal working hours and the management of such deliveries should be explained in the DSP.

6.2.29. Provision should be made within off-street, in-building, servicing bays for shredding operations to reduce the potential for disturbance to neighbours. On-street shredding will not be permitted.

6.2.30. Further information is set out in the City of London's Freight and Servicing SPD.

Policy VT3: Vehicle Parking

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised as sites for last mile delivery hubs and other alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported if it is demonstrated that they are no longer needed for a transport-related function.
4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as near stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

Reason for the policy

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

How the policy works

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

Policy VT4: River Transport

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

Reason for the policy

- 6.2.35. Walbrook Wharf is the only active river wharf in the City and will be retained as a waste facility and river wharf in line with the London Plan and the Mayor's Safeguarded Wharves Direction. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site, there may be potential to use Walbrook Wharf for freight logistics.
- 6.2.36. Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.

6.2.37. Swan Lane Pier is a redundant pier and the City Corporation will seek its reinstatement. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.

6.2.38. The City Corporation will require developments adjacent to, on, or over the river, to consider the use of the river for freight and servicing and for the transport of construction and waste materials.

Policy VT5: Aviation Landing Facilities

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

6.2.39. Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's 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.

6.3. Active Travel and Healthy Streets

Context

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



Figure 14: Mayor's Transport Strategy Healthy Streets Indicators (Source: Lucy Saunders)

6.3.2. The City's workforce is expected to increase significantly over the course of the Plan period to 2036, while visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early evening. Figure 15 illustrates forecast pedestrian flows across the City in 2026 during the am peak.

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

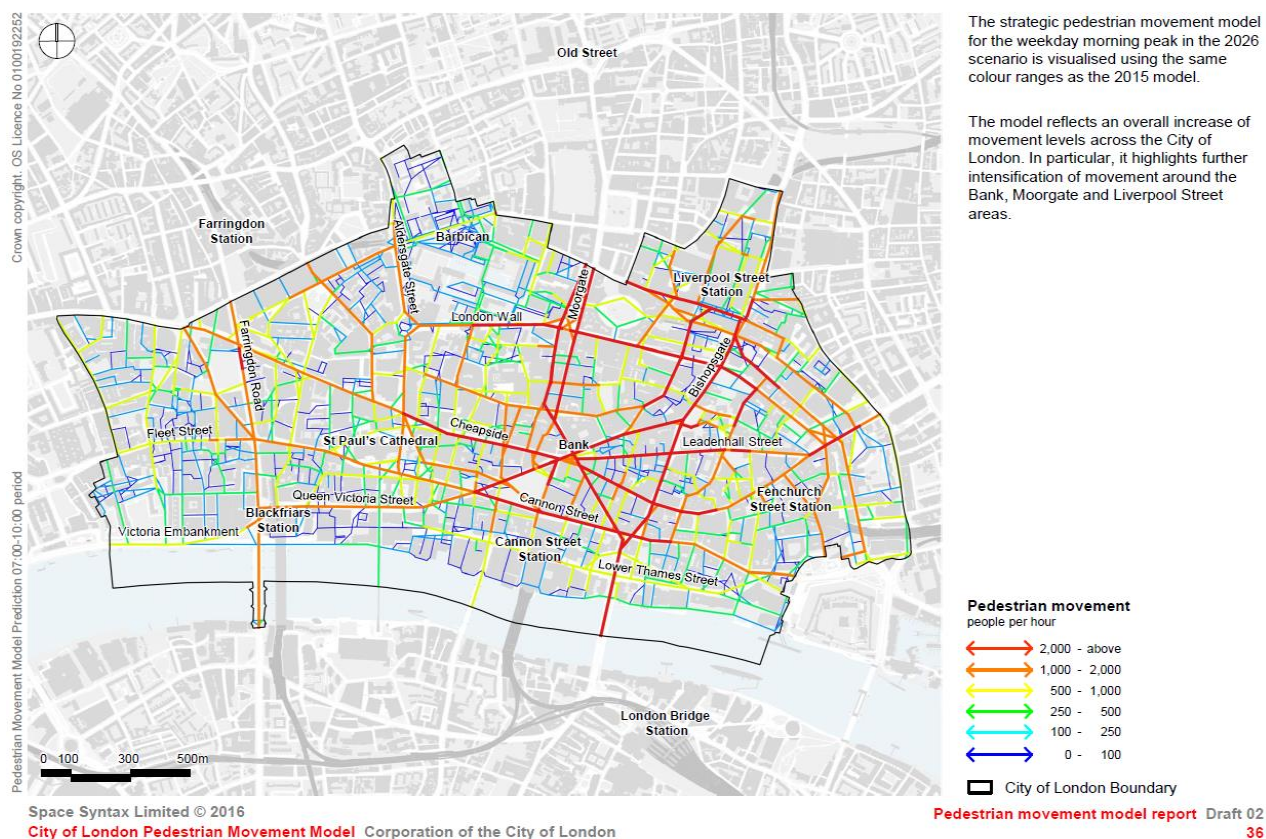


Figure 15: Forecast pedestrian flows in the City of London in the am peak in 2026

Strategic Policy S10: Active Travel and Healthy Streets

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

- improving conditions for safe, convenient, comfortable and accessible walking and cycling, incorporating climate change adaptation;
- expanding the cycle network across the City with the aim of ensuring that nearly all property entrances are within 250m of the network;
- implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;
- improving access routes and the public realm around stations, and between stations and key destinations; and
- implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of people with disabilities.

Reason for the policy

6.3.3. Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, with over 750,000 walked journeys a day. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost 300% between 1999 and 2017, although the rate of growth has slowed

markedly since 2012. People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during peak periods. Pedestrian numbers have also risen in recent years as the City's workforce has grown. Over 400,000 pedestrians were counted on the City's streets during a survey in November 2017.

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

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

How the policy works

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

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

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

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum of London. The area covered will align with the Smithfield and Barbican Key Area of Change.
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting the delivery of the proposed new Centre for Music and associated changes to the Museum of London roundabout and St Paul's Gyratory.
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Cluster Key Area of Change and incorporate part of the Aldgate and Tower Key Area of Change.

- Temple and Fleet Street: in response to the Fleet Street Estate Project, which comprises the new Magistrates court and City of London Police headquarters, and enhancement of Fleet Street and the Temples area.

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

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

Policy AT1: Pedestrian Movement

1. Developers should facilitate pedestrian movement and reduce severance by provision of suitable routes through and around new developments. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall.
2. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians using them.
3. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
 - the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - the shortest practicable routes between relevant points.
4. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
5. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable.
6. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.

7. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.

Reason for this policy

6.3.11. In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes. Policy DE4 sets out requirements for improved pedestrian permeability through buildings and development sites.

6.3.12. The City Corporation's Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, increasing the number of pedestrianised or pedestrian priority streets from 25km to 35km by 2030 and with an initial focus on the City Cluster and Culture Mile. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.

6.3.13. The Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 16):

- the area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank Junction;
- Bank Junction and streets between the junction and the City Cluster;
- the route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory;
- the route between the Barbican and the new Museum of London, including Beech Street and Long Lane (the 'Culture Spine');
- Fleet Street, including potential changes to Ludgate Circus (in partnership with TfL);
- the Bishopsgate corridor, including Monument junction (in partnership with TfL);
- The Globe View section of the Riverside Walkway.

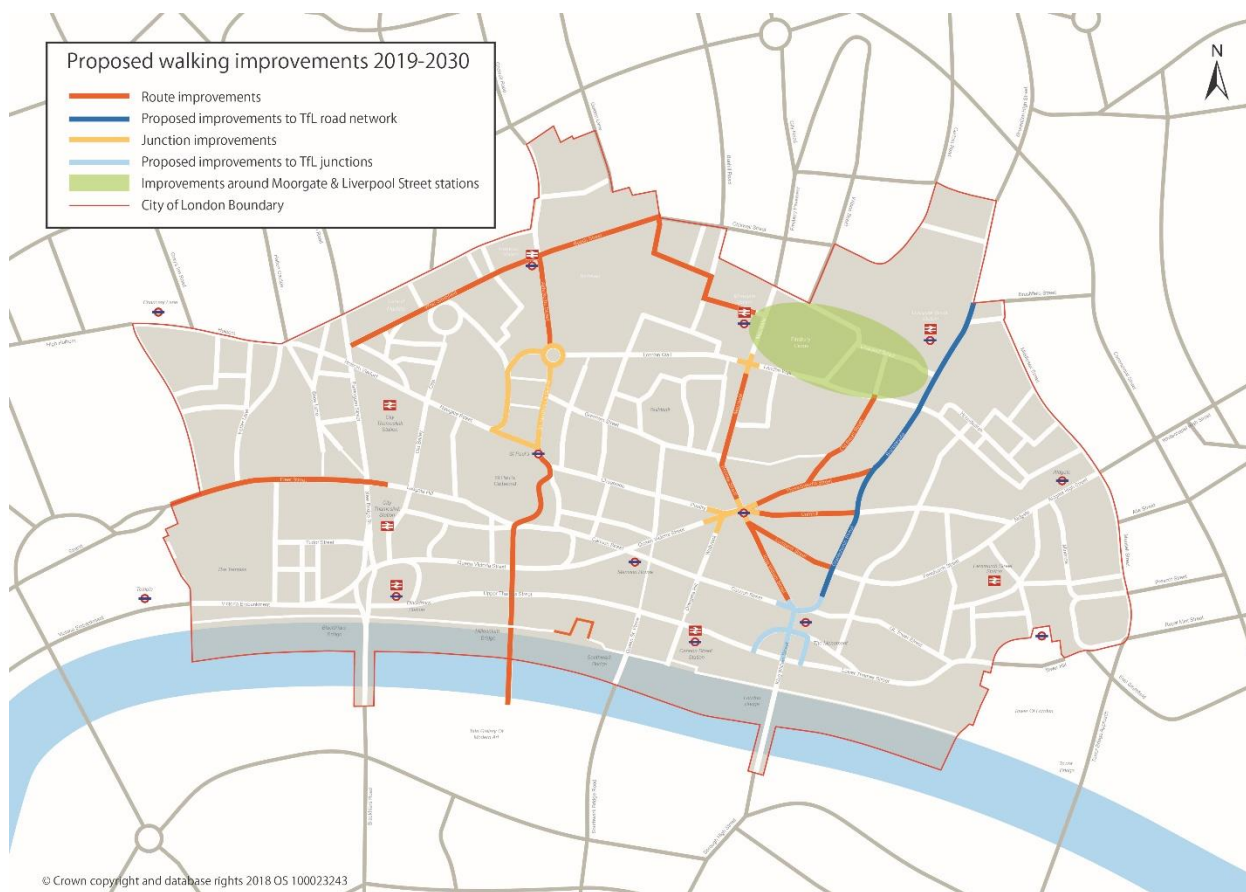


Figure 16: Proposed walking improvements 2019-2030

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

How the policy works

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

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

of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

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

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

Policy AT2: Active Travel including Cycling

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

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

Reason for this policy

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

6.3.20. A growing number of people are choosing to cycle through and around the Square Mile. Increased access to the East-West and North-South Cycle Superhighways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 17). Cycling improvements and interventions will be prioritised on this network, with the aim of delivering the core cycling network by 2035.

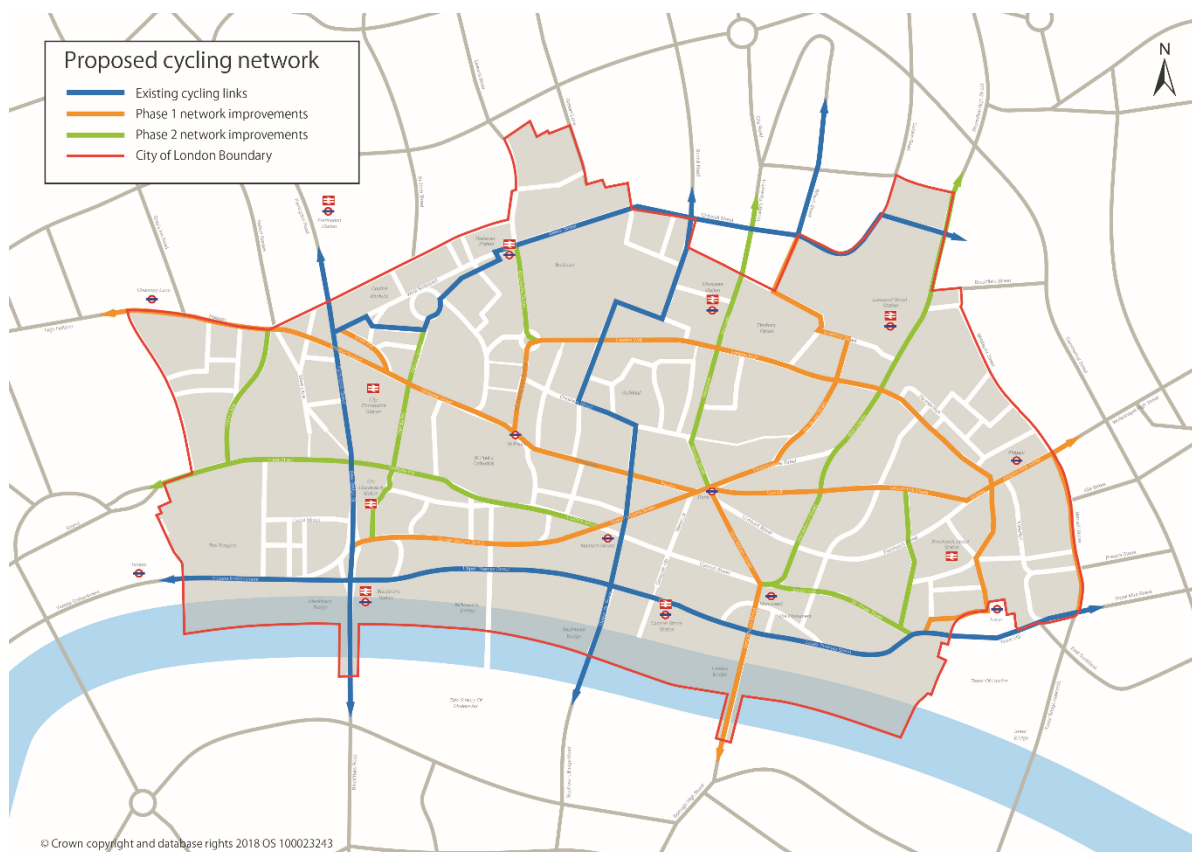


Figure 17: Proposed core cycling network and phasing

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

How the policy works

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

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

Policy AT3: Cycle Parking

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

Reason for this policy

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

How the policy works

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

6.4. Historic Environment

Context

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

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

Strategic Policy S11: Historic Environment

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

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

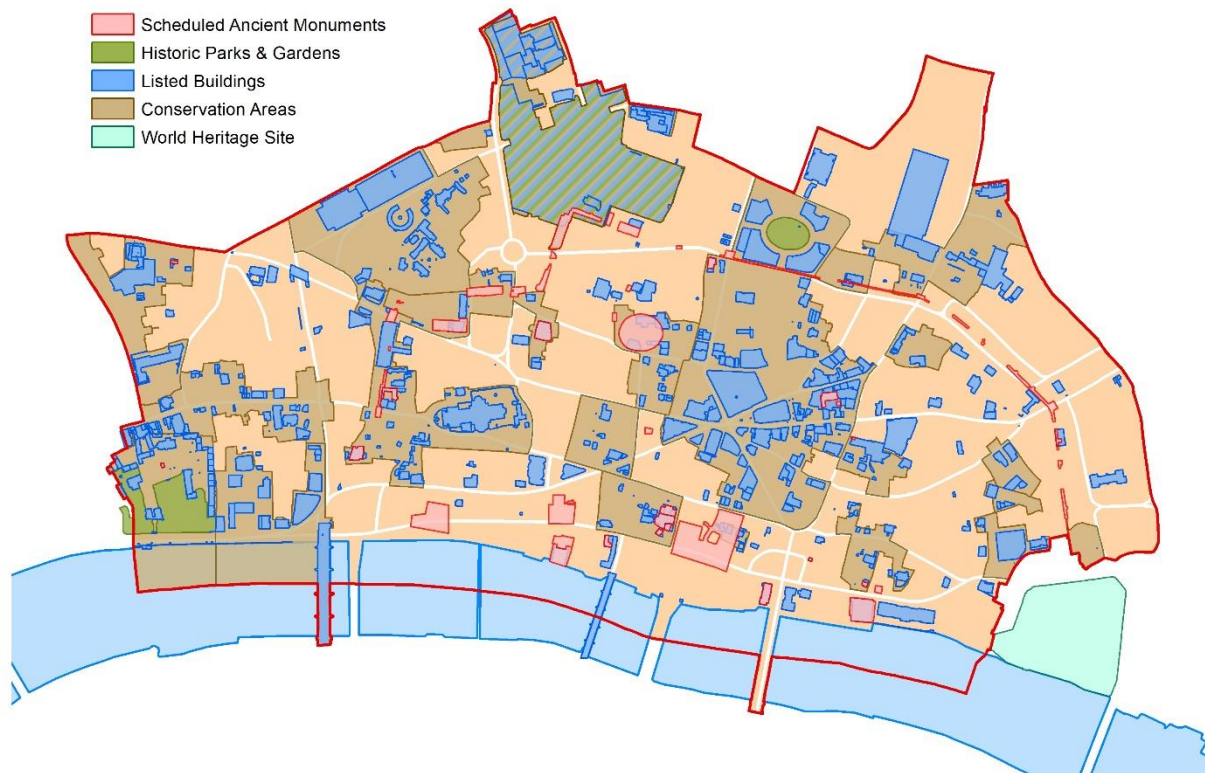


Figure 18: Designated heritage assets in the City of London

Reason for the policy

- 6.4.3. The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.
- 6.4.4. The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.
- 6.4.5. The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of the City's listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space. The City has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, Bevis Marks Synagogue and an equally unique collection of over 60 churchyards embedded within a dense townscape.

6.4.6. Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as creative industries, and providing potential space for hotels and retail uses. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to, and experience of, the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

How the policy works

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

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

6.4.9. In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage Site of Outstanding Universal Value (OUV).

Policy HE1: Managing Change to Heritage Assets

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

1. Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings.
2. Development in conservation areas should preserve or enhance the character or appearance of the conservation area. The loss of buildings and elements which contribute to the character, appearance or significance of a conservation area will be resisted;
3. Development should not adversely affect Historic Parks and Gardens included on the Historic England Register and historic open spaces;
4. The demolition or loss of designated heritage assets will be refused, having regard to the tests set out in national policy.
5. Where proposals would result in harm to, or the loss of, a non-designated heritage asset, the City Corporation will have regard to the scale of any harm or loss, the significance of the heritage asset and the wider public benefits proposed.

6. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought.

Reason for the policy

- 6.4.10. It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.
- 6.4.11. National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 6.4.12. Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear understanding of a building, structure, open space or archaeological remains, including group value.
- 6.4.13. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.
- 6.4.14. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
- 6.4.15. Many buildings in conservation areas, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.

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

How the policy works

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

Policy HE2: Ancient Monuments and Archaeology

1. Development proposals which involve excavation or ground works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.
2. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, inclusive access to, public display and interpretation where appropriate.
3. Proper investigation and recording of archaeological remains will be required as an integral part of a development programme, together with timely publication and archiving of results to advance understanding.

Reason for the policy

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

How the policy works

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

there should be interpretation to widen knowledge and contribute to the interest of the townscape.

- 6.4.26. A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be conditioned and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

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

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

Reason for the policy

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

How the policy works

- 6.4.28. Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.
- 6.4.29. The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its OUV, while accommodating change. The International Council on Monuments and Sites (ICOMOS) publication 'Guidance on Heritage Impact

Assessments for Cultural World Heritage Properties' offers guidance on the process of commissioning Heritage Impact Assessments (HIAs) for World Heritage properties, in order to evaluate the impact of potential development on the OUV of properties.

6.5. Tall Buildings and Protected Views

Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD).
2. Tall buildings of world class architecture and sustainable and accessible design will be encouraged 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

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

to the development of tall buildings within and outside the City. Areas outside of the City may also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered. Policy HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site.

6.5.2. Tall buildings are defined as those exceeding 75m AOD in height. Figure 19 shows their current distribution. 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.

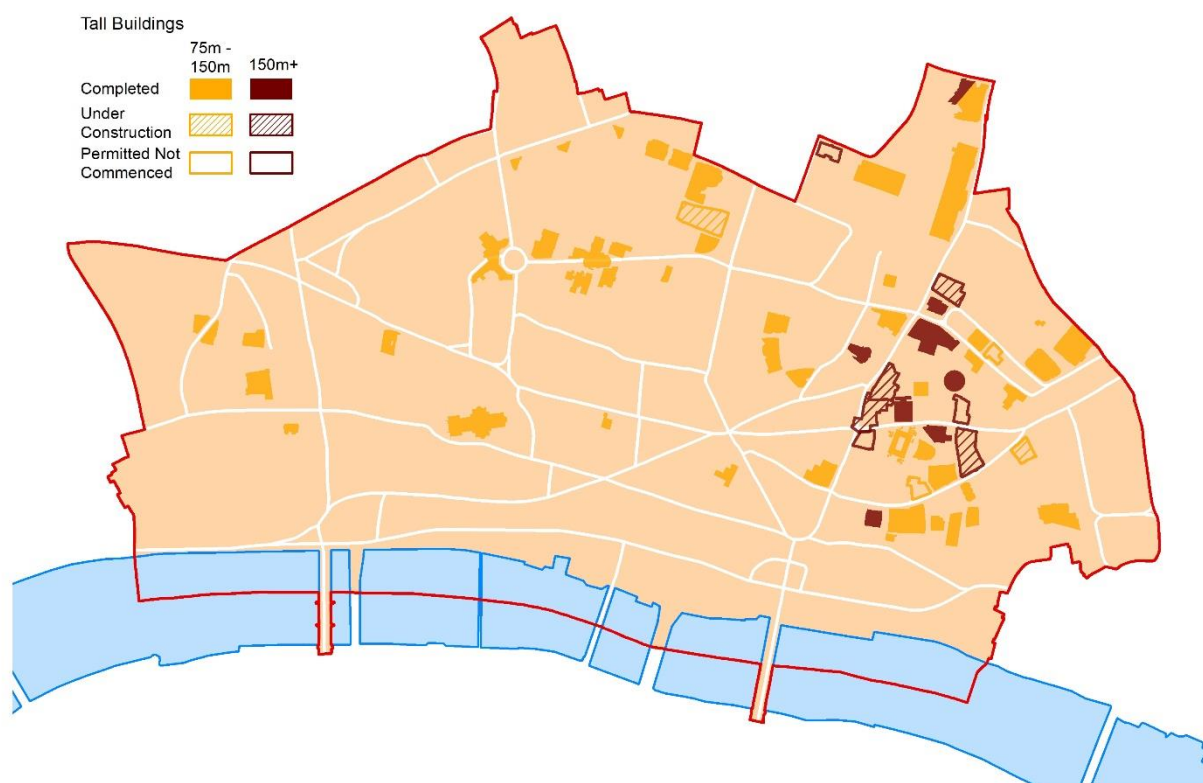


Figure 19: Tall buildings distribution in the City of London September 2019

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

6.5.4. All of the City of London is sensitive to development of tall buildings and the City Cluster represents the most appropriate area for encouraging tall buildings in the City. This does not mean that all sites within the Cluster are suitable. All new tall

building proposals will need to satisfy the requirements of Strategic Policy S12 and other policies in this Plan and the London Plan. Strategic Policy S21 provides more details about the considerations that apply specifically to new tall building proposals in the City Cluster.

6.5.5. Outside of the City Cluster, there is less scope for new tall buildings due principally to conservation area and views protection considerations. Figure 21 identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies, based on a composite of the various policy designations illustrated in Figure 20.

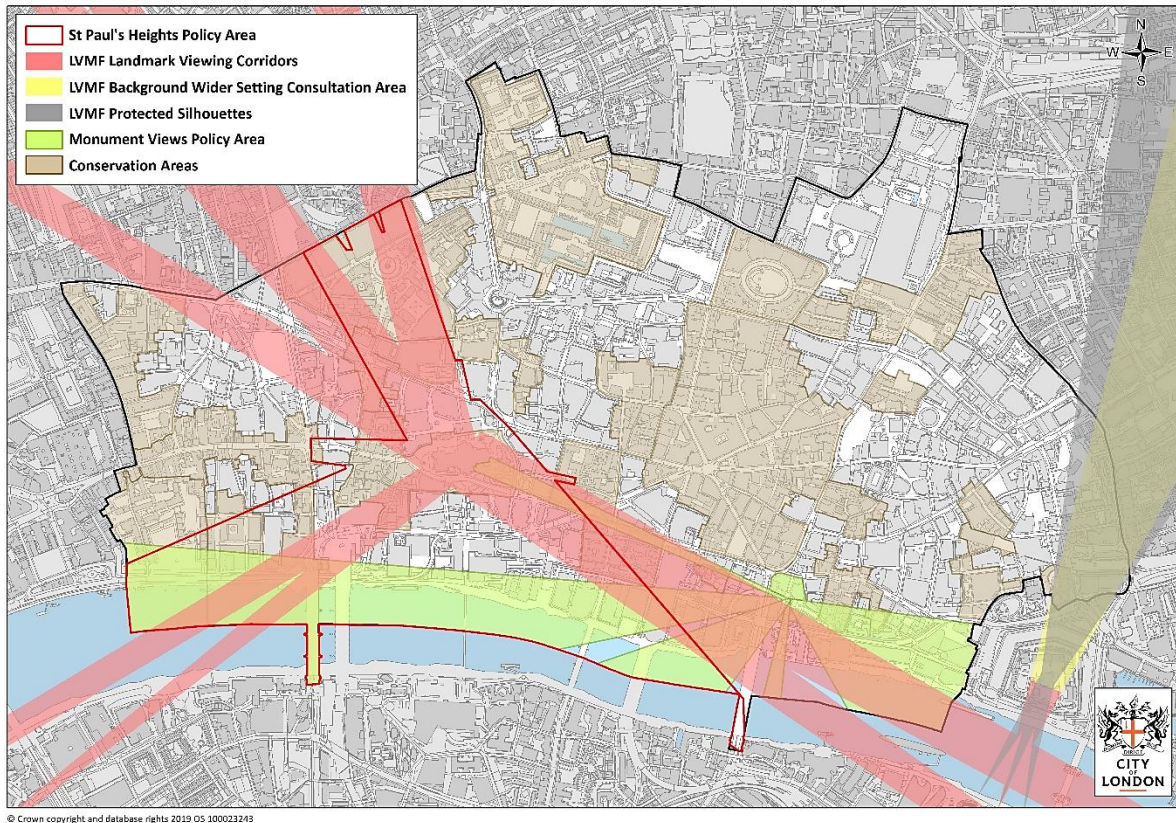


Figure 20: Components of areas inappropriate for new tall buildings

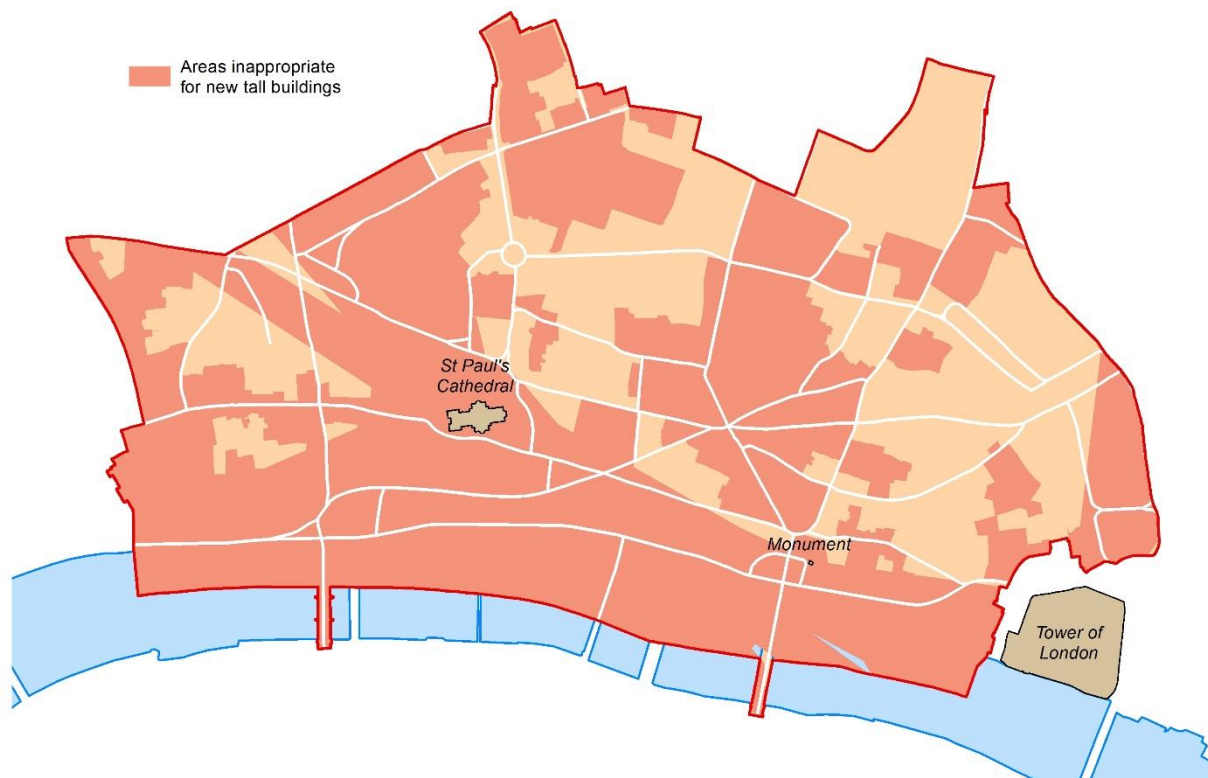


Figure 21: Areas inappropriate for new tall buildings –

How the policy works

6.5.6. Tall buildings are high-profile developments with a wider impact, visible on the skyline across large parts of London. They provide City landmarks and should be designed to enhance the City's skyline.

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

6.5.8. The development of tall buildings must take account of City Corporation Planning Advice Notes on the potential microclimate and thermal comfort impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar

convergence, sunlight, wind and thermal comfort explaining how they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.

6.5.9. Proposals for new tall buildings should take account of the cumulative impact of other proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.

6.5.10. Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. They 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 retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries. There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London.

6.5.11. The City Corporation will use 3D 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.

Strategic Policy S13: Protected Views

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

- implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
- protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from Fleet Street and Ludgate Hill; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features.
- securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).

Reason for the policy

6.5.12. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River

Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.

6.5.13. The approach to views protection in this Plan is a clarification of the long-standing policy, rather than seeking changes to policy. It is supported by more detailed guidance in the Protected Views SPD.

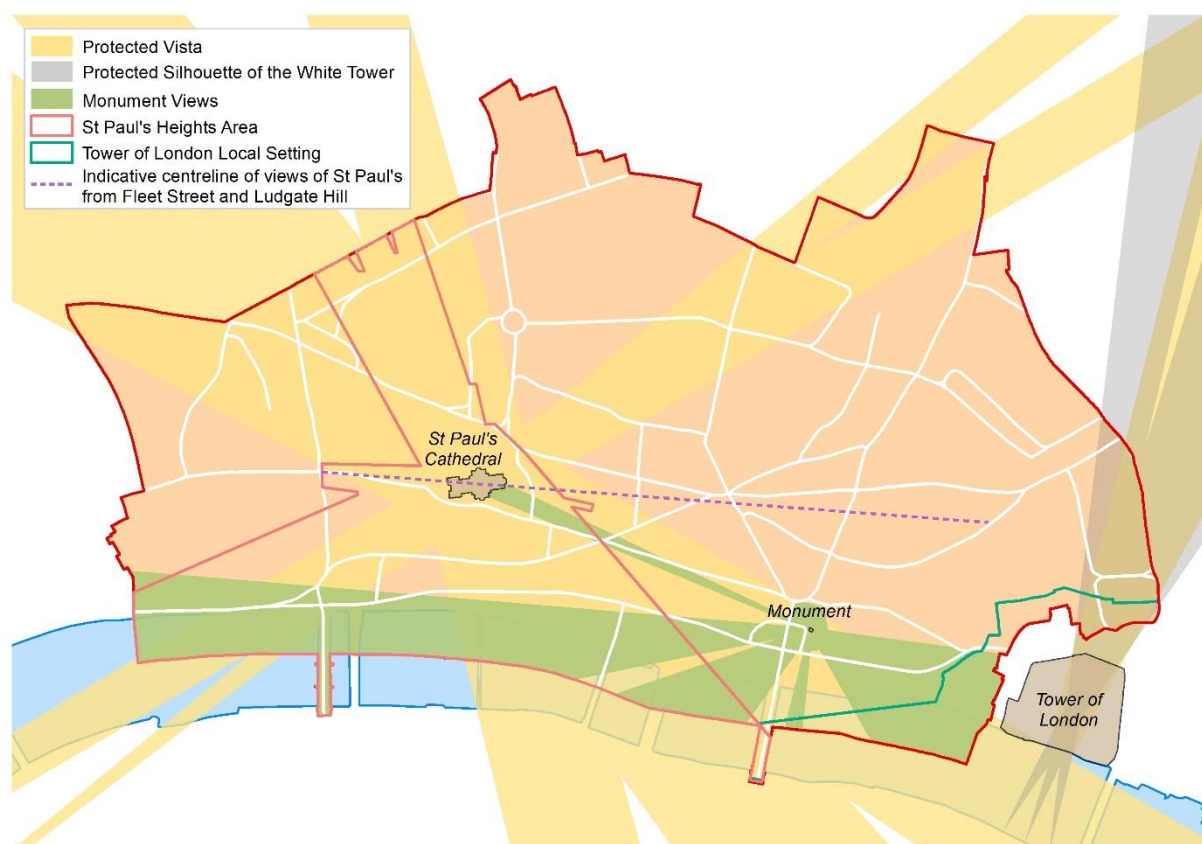


Figure 22: Areas covered by protected views

How the policy works

6.5.14. Protected Vistas are defined geometrically from an assessment point at the view location to the Strategically Important Landmark that is the focus of the protected vista. Each Protected Vista includes a Landmark Viewing Corridor, within which development should not exceed the height of the threshold plane. Beside and behind Landmark Viewing Corridor are the Wider Setting Consultation Areas, within which development that exceeds the threshold plane should not compromise the viewer's ability to recognise and appreciate the Strategically Important Landmark.

- 6.5.15. Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.
- 6.5.16. The LVMF defines a Protected Vista and a White Tower Protected Silhouette for the Tower of London. Any development in the Wider Setting Consultation Area in the background of this Protected Vista and the White Tower Protected Silhouette should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, proposed new development in the City which exceeds the defined LVMF threshold plane for this view will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.
- 6.5.17. The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.
- 6.5.18. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street and Ludgate Hill which forms part of the processional route between Westminster and the City. The views of St Paul's change along the length of this route, depending on the topography and alignment of buildings. Development proposals visible from agreed assessment points should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure 23 to highlight this issue. Further details will be set out in an update to the Protected Views SPD and Statement of Significance to inform the future conservation and enhancement of this approach.
- 6.5.19. New development proposals should be well designed in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE, Historic England and the Greater London Authority.
- 6.5.20. The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.

6.5.21. The City Corporation will supplement its assessment of strategic and locally protected views with a visual assessment carried out using 3D digital modelling technology. Developers should submit virtual models for all major development in an open source or other format compatible with the City Corporation's 3D digital model.

6.6. Open Spaces and Green Infrastructure

Context

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

Strategic Policy S14: Open Spaces and Green Infrastructure

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

- protecting existing open and green space;
- seeking the provision of new open and green space through development, public realm or transportation improvements;
- increasing public access to existing and new open spaces;
- creating, maintaining and encouraging high quality green infrastructure;
- using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
- promoting the greening of the City through new development opportunities and refurbishments;
- ensuring new development and refurbishment protect and enhance the City's biodiversity.

Reason for the policy

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

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

6.6.4. The City of London Corporation is committed to protecting existing open spaces and expanding the provision of green infrastructure as far as possible consistent with heritage significance. The City Corporation seeks further urban greening to make the Square Mile more attractive to workers, residents and visitors. This would contribute to the Mayor of London's ambition to make over 50 per cent of London

green by 2050 and support London's designation in 2019 as the world's first National Park City.

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

How the policy works

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

Open Spaces

Policy OS1: Protection and provision of open spaces

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

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

Reason for the policy

6.6.7. The City of London has 376 open spaces totalling just under 34 hectares which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway. Most of the open spaces are small, with approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and

climate change, to provide facilities for relaxation, tranquillity, agile working, leisure and sport, and to increase biodiversity.

How the policy works

- 6.6.8. Many open spaces in the City are of historic value, such as churchyards, while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. Policy DE3 sets out standards for public realm improvements. These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs.
- 6.6.9. The provision of open space across the City is uneven. The northern area of the City contains just over half of all the open space in the City, due to the relatively large amounts of space in the Barbican and Golden Lane estates and the Broadgate commercial estate. There is significant open space along the Thames and the riverside, with the Riverside Walk, the Temples legal precinct and space close to the Tower of London. A new area of public realm will be created at Blackfriars foreshore as a result of the Thames Tideway Tunnel project. Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area and the City Cluster areas have the lowest proportions of open space and face pressure from the increasing employment and pedestrian numbers associated with commercial intensification (see Figure 15). Additional open space is especially important in these areas, both at street level and at higher levels through the provision of accessible roof gardens/terraces.
- 6.6.10. There is intense pressure on all the City's open spaces particularly at lunchtimes and new development provides opportunities to create additional open space in and around buildings. These spaces should be designed for multiple uses, be maintained to a high standard and be resilient to future climate conditions.

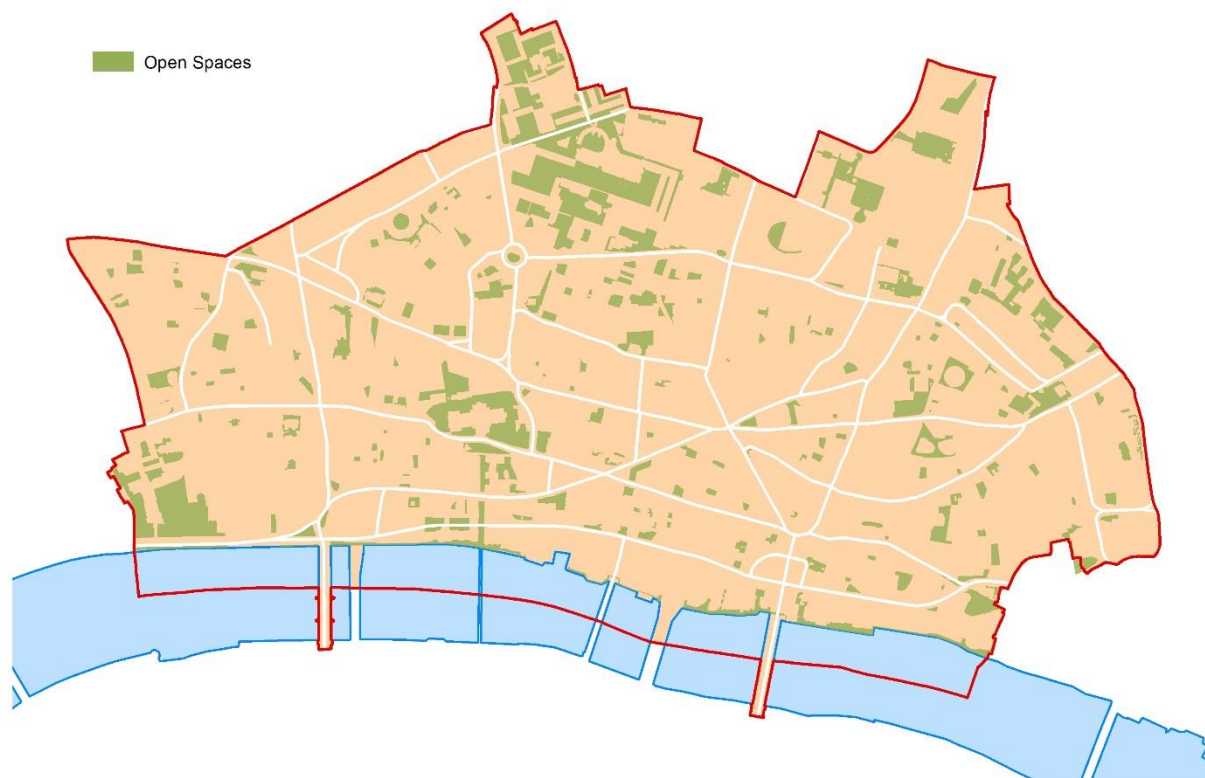


Figure 23: Open Spaces in the City of London

Policy OS2: City Greening

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

Reason for the policy

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

How the policy works

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

Biodiversity

Policy OS3: Biodiversity

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

- retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
- measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats;
- green roofs and walls, gardens and terraces, soft landscaping and trees;
- green corridors and biodiversity links;

- wildlife-friendly features, such as nesting or roosting boxes and beehives;
- a planting mix and variation in vegetation types to encourage biodiversity;
- planting which will be resilient to a range of climate conditions, with a high proportion of native plants;
- a lighting scheme designed to minimise impacts on biodiversity.

Reason for the policy

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

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

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

How the policy works

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

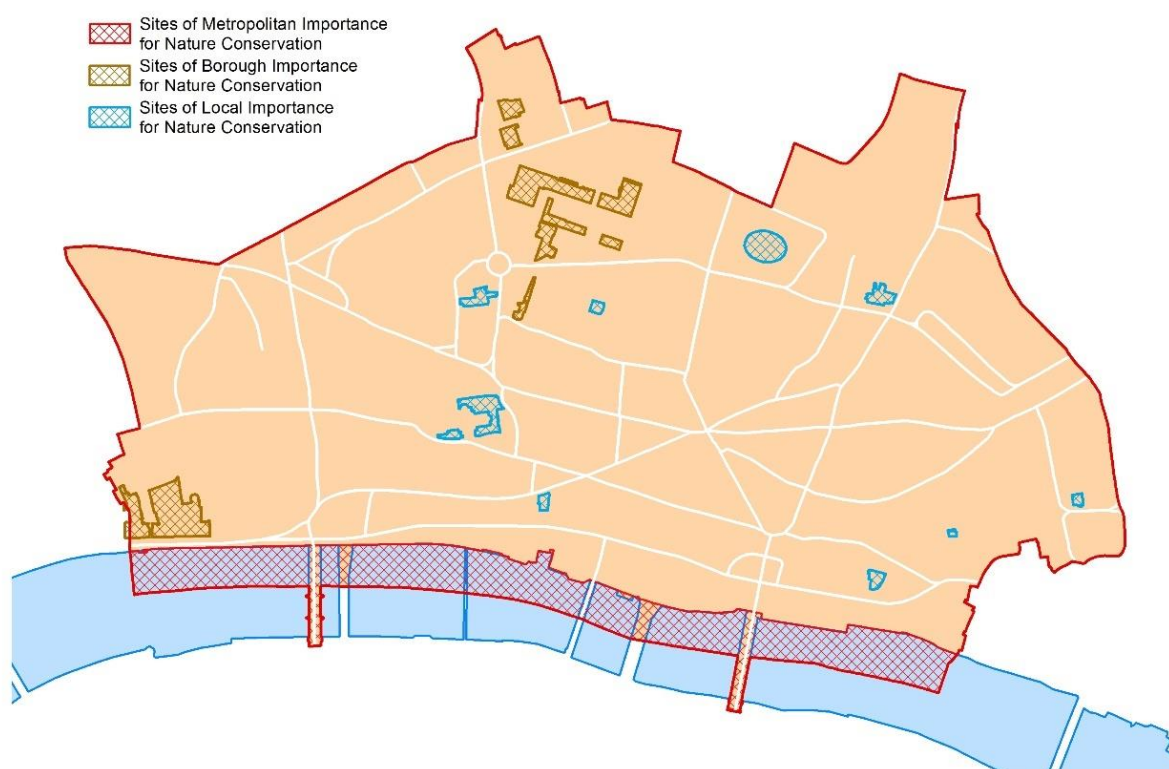


Figure 24: Sites of Importance for Nature Conservation (SINCs)

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

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

6.6.29. Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.

6.6.30. Where development has a potential impact on designated sites of importance for biodiversity, the developer should submit an ecological statement outlining how any impacts will be avoided, minimised or mitigated. Where necessary, the City

Corporation will seek independent review of an assessment, paid for by the developer.

6.6.31. Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. The Mayor of London will be producing guidance to set out how biodiversity net gain applies in London.

Trees

Policy OS4: Trees

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

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

Reason for the policy

6.6.32. There are just over 2,500 trees in the City, which are found in a variety of locations: along streets, in open spaces such as churchyards and Livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.

6.6.33. Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to enhancing amenity and townscape. Trees provide a wide range of benefits in the urban environment, including the trapping of air pollutants, enhancing biodiversity, providing shade and shelter from sun and rain, absorbing rainwater and filtering noise.

6.6.34. The City of London Tree Strategy SPD aims to increase the number of City Corporation owned trees and ensure that all trees within the City are managed, preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the townscape for both current

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and future generations. The Tree Strategy SPD will be kept under review and should be read alongside the City of London Biodiversity Action Plan (BAP).

6.6.35. Trees play an important role in connecting green spaces to create green corridors. Additional planting where feasible will help to reinforce those corridors. It is important that new tree planting includes a variety of species to increase the resilience of the City's tree stock against the threat of disease and the impacts of a changing climate.

How the policy works

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

6.6.37. The City Corporation will use TPOs, s106 planning obligations or conditions to ensure the retention of existing trees and the provision of new trees.

6.7. Climate Resilience and Flood Risk

Context

6.7.1. This section aims to ensure that the City of London remains resilient to changing climate patterns. The main focus is on flood risk and the risk of overheating of buildings and spaces which will become more frequent as a result of climate change.

6.7.2. The UK Climate Projections (CP18) predict that London will experience a rise in mean temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review. The City Corporation is developing a Climate Action Strategy setting out how the City can transition to a zero carbon economy and be resilient to the impacts of climate change.

Strategic Policy S15: Climate Resilience and Flood Risk

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

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

Reason for the policy

6.7.3. Today's new buildings will probably be in place for decades or longer and must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will help keep the City safe and comfortable as climate patterns change. Policy DE1 sets out sustainability standards for new development in the City and the City Corporation's ambition to move to a zero emission City.

6.7.4. Although the total annual rainfall is projected to remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.

6.7.5. The City lies within the tidal section of the Thames and is vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan identifies the need for the existing flood defences in central London to be raised by up to 0.5m by 2065 and 1m between 2065 and 2100 to protect London from flooding.

How the policy works

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

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

Policy CR1: Overheating and Urban Heat Island Effect

1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:
 - solar shading to prevent solar gain, particularly on glazed facades;
 - urban greening to improve evaporative cooling;
 - passive ventilation and heat recovery;
 - use of thermal mass to moderate temperature fluctuations;
 - minimal reliance on energy intensive cooling systems.
2. Building designs should minimise any contribution to the urban heat island effect.

Reason for the policy

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

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

How the policy works

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

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

Policy CR2: Flood Risk

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

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

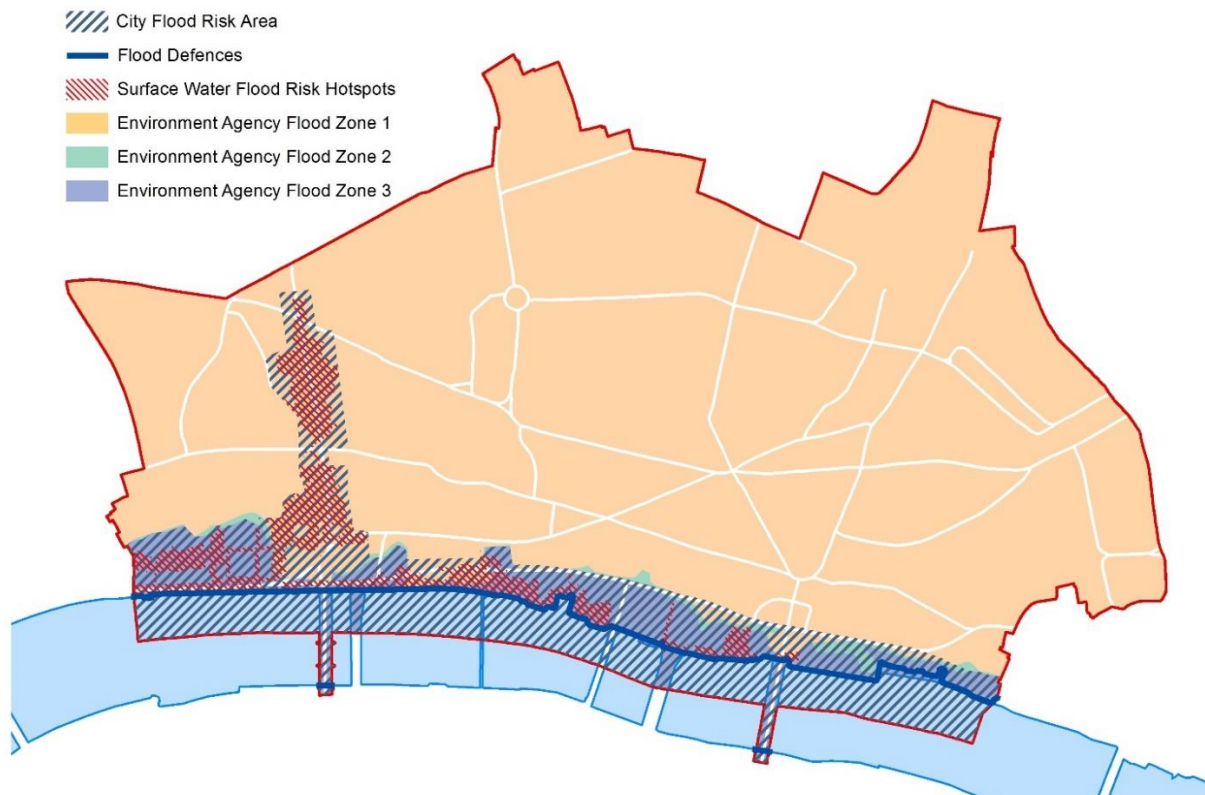


Figure 25: City Flood Risk Area

Reason for the policy

- 6.7.12. While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water/sewer overflow in the former Fleet valley.
- 6.7.13. Figure 25 identifies the areas at risk from these sources as the City Flood Risk Area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

How the policy works

- 6.7.14. Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development. Design and mitigation measures such as sustainable drainage systems may provide protection from flooding for properties beyond the site boundaries.
- 6.7.15. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 4 shows the vulnerability classifications and Table 5 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. The Environment Agency's flood zones are shown on the policies map. The Sequential Test must be applied for all development other than minor development or change of use in the City Flood Risk Area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water / sewer flooding. Where a change of use results in a more vulnerable use evidence must be presented to demonstrate safety and suitable access and egress routes.
- 6.7.16. If the intended use of a site falls into one of the categories where an Exception Test is required, as set out in Table 5, the developer will need to investigate whether there is a reasonably available site outside the City Flood Risk Area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the Exception Test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Essential Infrastructure	<ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations
Highly Vulnerable	<ul style="list-style-type: none"> • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Installations requiring hazardous substances consent.
More Vulnerable	<ul style="list-style-type: none"> • Hospitals • Residential institutions such as care homes and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non-residential uses for health services, nurseries and educational establishments. • Sites used for waste management facilities for hazardous waste.
Less Vulnerable	<ul style="list-style-type: none"> • Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure. • Police, ambulance and fire stations which are not required to be operational during flooding. • Waste treatment (except hazardous waste facilities).
Water-compatible development	<ul style="list-style-type: none"> • Flood control infrastructure. • Sewage transmission infrastructure and pumping stations • Docks, marinas and wharves. • Navigation facilities. • Water-based recreation (excluding sleeping accommodation). • Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.

Table 1: Flood risk vulnerability classifications relevant to the City

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

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

Table 2: Suitability of different uses in flood zones

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

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

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

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

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

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

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

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

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

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

Policy CR3: Sustainable drainage systems (SuDS)

1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as

close as possible to greenfield rates and the number of discharge points has been minimised.

3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.

Reason for the policy

6.7.23. The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City Flood Risk Area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.

6.7.24. More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

How the policy works

6.7.25. All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.

6.7.26. For major development, pre-application discussion is encouraged with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the Environment Agency, Thames Water and other interested parties, to ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan Drainage Hierarchy and local requirements should be discussed at pre-application stage with the City Corporation.

6.7.27. Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.

6.7.28. For all major development, a separate SuDS and Drainage Plan must be submitted at the application stage. For minor development the Design & Access

Statement should include details of how rainwater run-off has been minimised. Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.

- 6.7.29. Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.
- 6.7.30. Arrangements for maintenance throughout the life of the building must be considered in the design of SuDS. Planning conditions may be used to secure a suitable operations and maintenance plan.

Policy CR4: Flood protection and flood defences

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

Reason for the policy

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

How the policy works

- 6.7.32. Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future flood defence raising without adverse impacts on river views, the setting of historic buildings and pedestrian movement along the riverside walk. Constraints may exist where flood defences form part of an existing building. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.
- 6.7.33. A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

6.8. Circular Economy and Waste

Context

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

Strategic Policy S16: Circular Economy and Waste

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

Reason for the policy

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

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

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

How the policy works

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

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

Policy CE1 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.

Reason for the policy

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

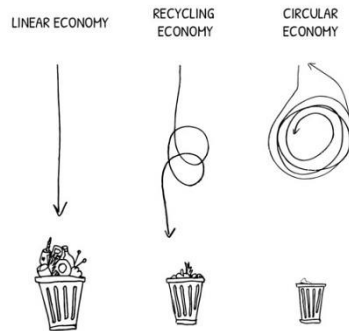


Figure 26: Circular Economy

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

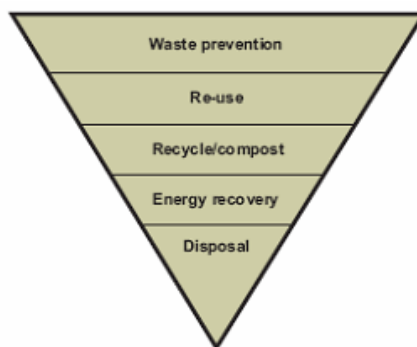


Figure 27: Waste Hierarchy

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

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

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

How the policy works

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

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

EIA Development

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

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

Other Major development

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

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

All other development

6.8.25. For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.

6.8.26. Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term-lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.

6.8.27. The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.

Policy CE2: Sustainable Waste Transport

The environmental impact of waste transport will be minimised through:

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

Reason for the policy

6.8.28. The proximity principle advocates that waste should be managed as close as possible to where it originates to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.

6.8.29. Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.

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

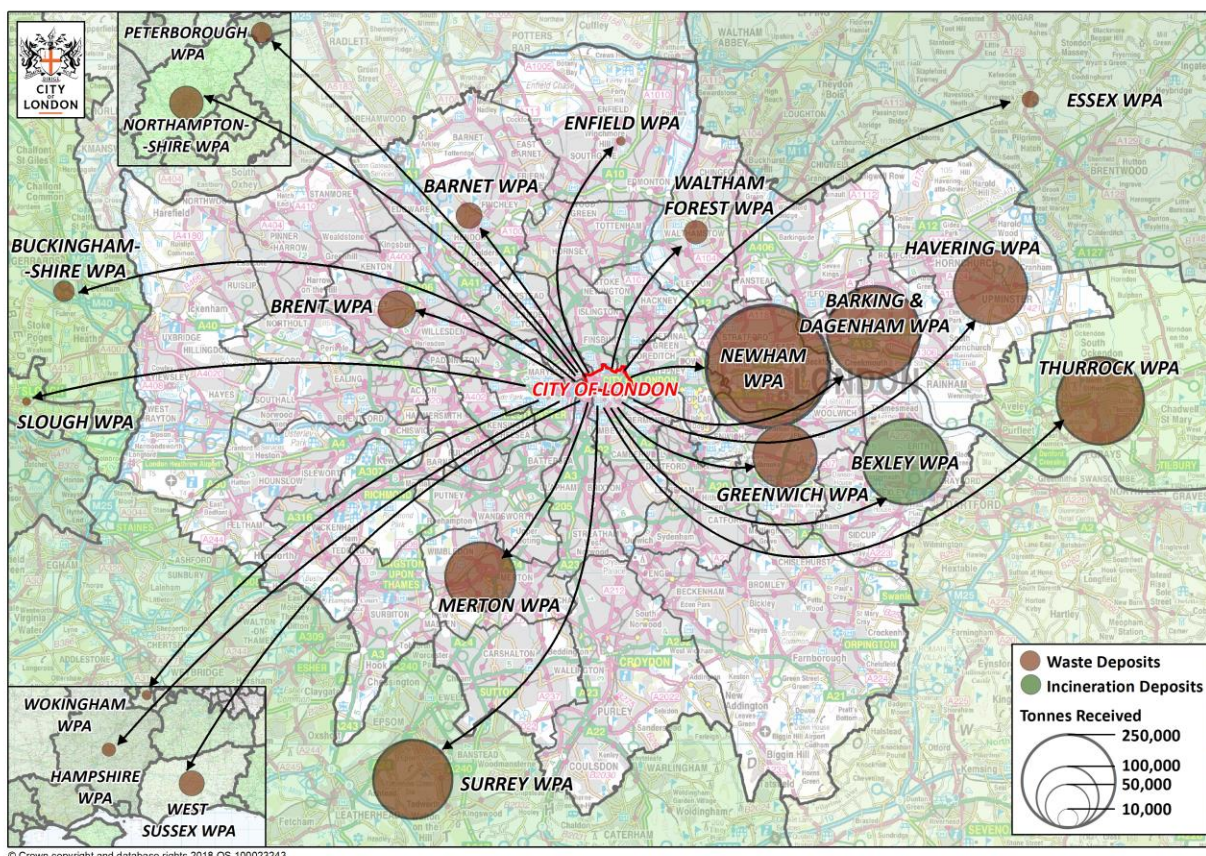


Figure 28: Destinations for the City's waste 2012-2018

How the policy works

6.8.31. The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste.

Major development

6.8.32. Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles will be enabled during the operational phase of the building's life.

All other development

6.8.33. Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed.

Policy CE3: New waste management sites

1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:

- the development will handle waste which has been generated locally;
 - access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
 - the carbon impact of the development will be minimised. New waste facilities should comply with the Mayor's Carbon Intensity Floor (CIF);
 - the development is resilient to natural and man-made safety and security challenges.
2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf and development which would compromise the use of the river for waste operations, will be resisted
3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.

Reason for the policy

6.8.34. Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

How the policy works

6.8.35. Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be a key matter in consideration of proposals. Mitigation which resolves potential conflicts may be necessary for development to proceed.

6.8.36. The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and conditions will be applied to ensure that any new facility is suitable for the City's high-density urban environment.

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.

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. Strategic Policy 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, 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 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 uses for transport and recreation, will be enhanced:

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 and enhancing 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 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, 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 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.

7.2.9. The 'Illuminated River Project' is 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.

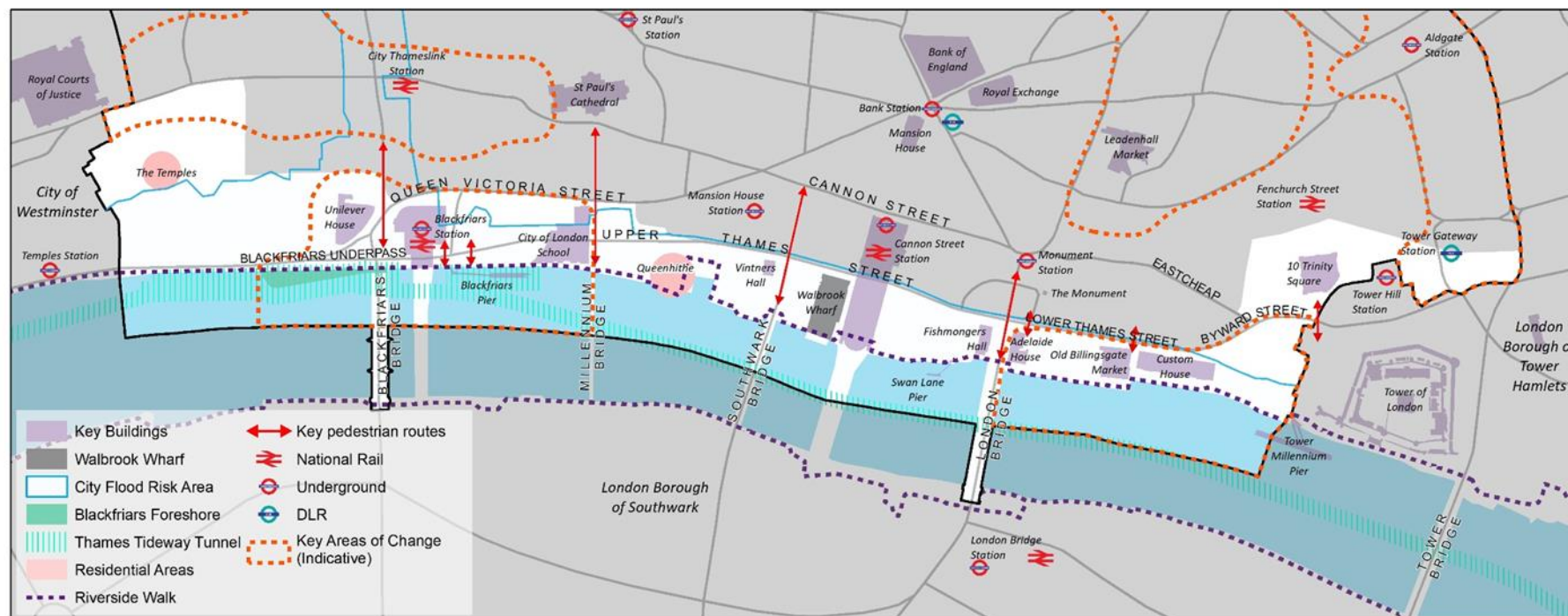


Figure 29: Thames Policy Area

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, few active frontages and a limited open space apart from the river.
- 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 built out into the river west of Blackfriars Bridge, which is due for completion in 2024. This will be the first new public open space in London on the River Thames for 150 years. 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:

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 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 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 make it a more pleasant area to visit and dwell.
- 7.3.7. The public realm 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 will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new area of public realm, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route 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.

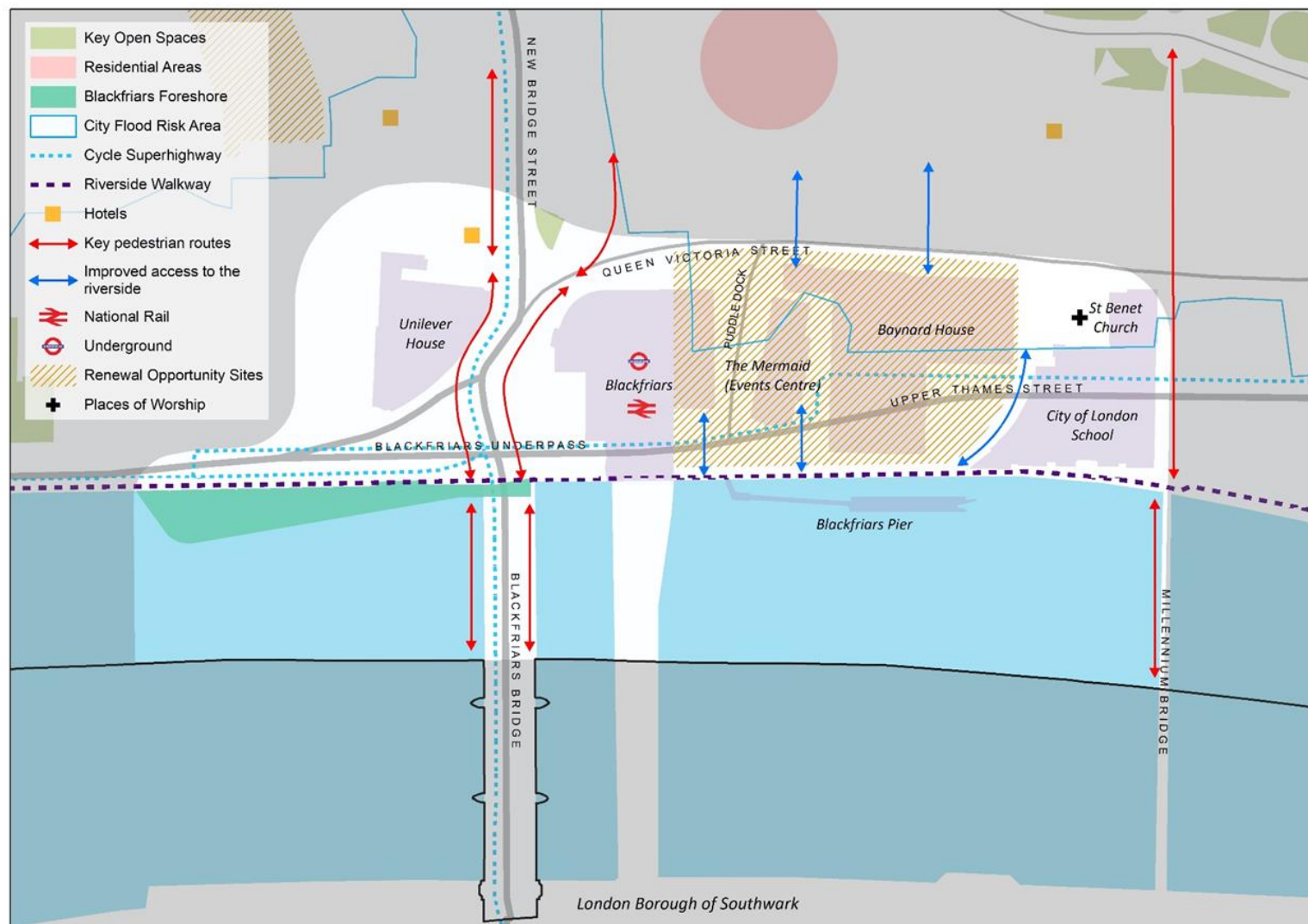


Figure 30: Blackfriars Key Area of Change

7.4. Pool of London Key Area of Change

Context

- 7.4.1. The area is the heart of what was once 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 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, 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 development and public realm improvements, which enhance heritage assets. The aim is to achieve a City riverside which complements that on the south bank of the 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 Monuments.

Strategic Policy S19: Pool of London

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

1. Enabling office-led redevelopment or refurbishment, 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 and which enhance heritage assets.
2. Requiring and encouraging increased vibrancy and active frontages at ground floor level, through the provision of retail and publicly accessible, leisure and cultural uses on the river frontage.
3. Encouraging the provision of cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Cultural Plans.
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 encouraging the development of shared servicing bays and access points and collaborative management;
 - preventing vehicular access onto the riverside walk and removing private car parking areas upon redevelopment.
6. Enhancing public realm and public spaces by:
 - enhancing the Riverside Walk to create a continuous publicly accessible walkway free of cars between London Bridge and Tower Bridge which is accessible to all;
 - identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and 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 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 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 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 and the creation of new crossing points 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 reinstated through the redevelopment and refurbishment of buildings.
- 7.4.11. The City Corporation will work with 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. 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.

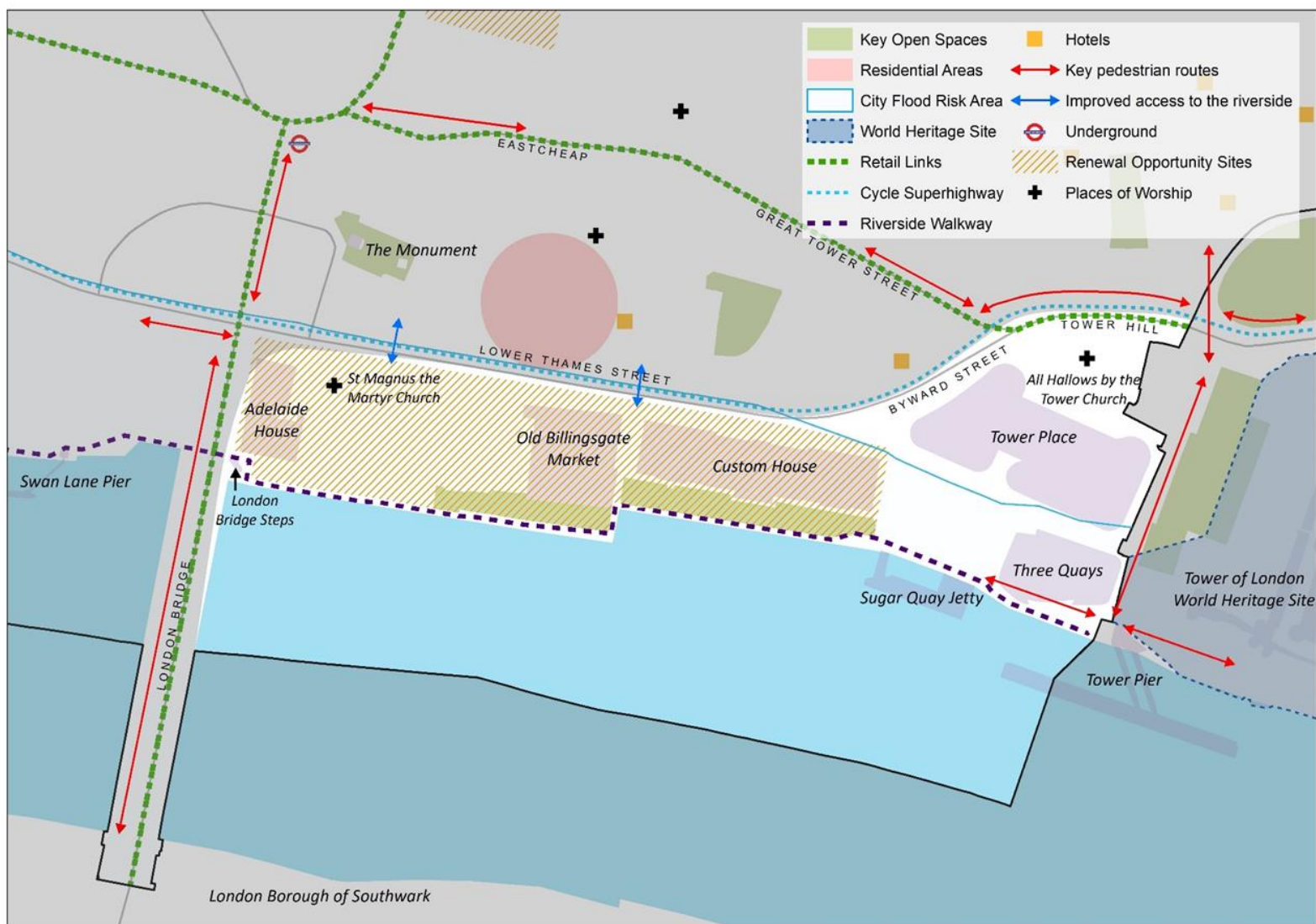


Figure 31: Pool of London Key Area of Change

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 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 are under construction on Minories. Proposals for the regeneration of the Mansell Street Estate have been considered and several large office sites currently have development potential. Petticoat Lane Market, a major tourist draw in the area, is undergoing public realm enhancement. These proposals and opportunities will impact on the area.
- 7.5.4. The Chinese Embassy could 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.

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.

1. Promoting office-led commercial development to assist in the further 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 long-term redevelopment potential of the Mansell Street Estate re-providing existing social housing, 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:

- enhancing Petticoat Lane Market, celebrating the character and history of the area and improving the visitor experience by working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders;
- encouraging cultural events, arts and play in public spaces;
- permitting additional hotels 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. 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 potential of the Mansell Street Estate means that it could be one of the largest residential schemes in the City during the Plan period which provides an opportunity to deliver additional housing to meet housing needs. Redevelopment would require the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential environment at high densities and reducing residential exposure to air and noise pollution.
- 7.5.9. Development in the Aldgate and Tower area should enhance its appearance and vibrancy and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities. With development occurring sporadically, 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 OF3 (Temporary Use of vacant offices and sites) and HL7 (Sport and recreation on temporary sites) support this approach.
- 7.5.10. Strategic Policy 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 progressing a cross-boundary Business Improvement District (BID); and Historic Royal Palaces, which manages the Tower of London World Heritage Site.

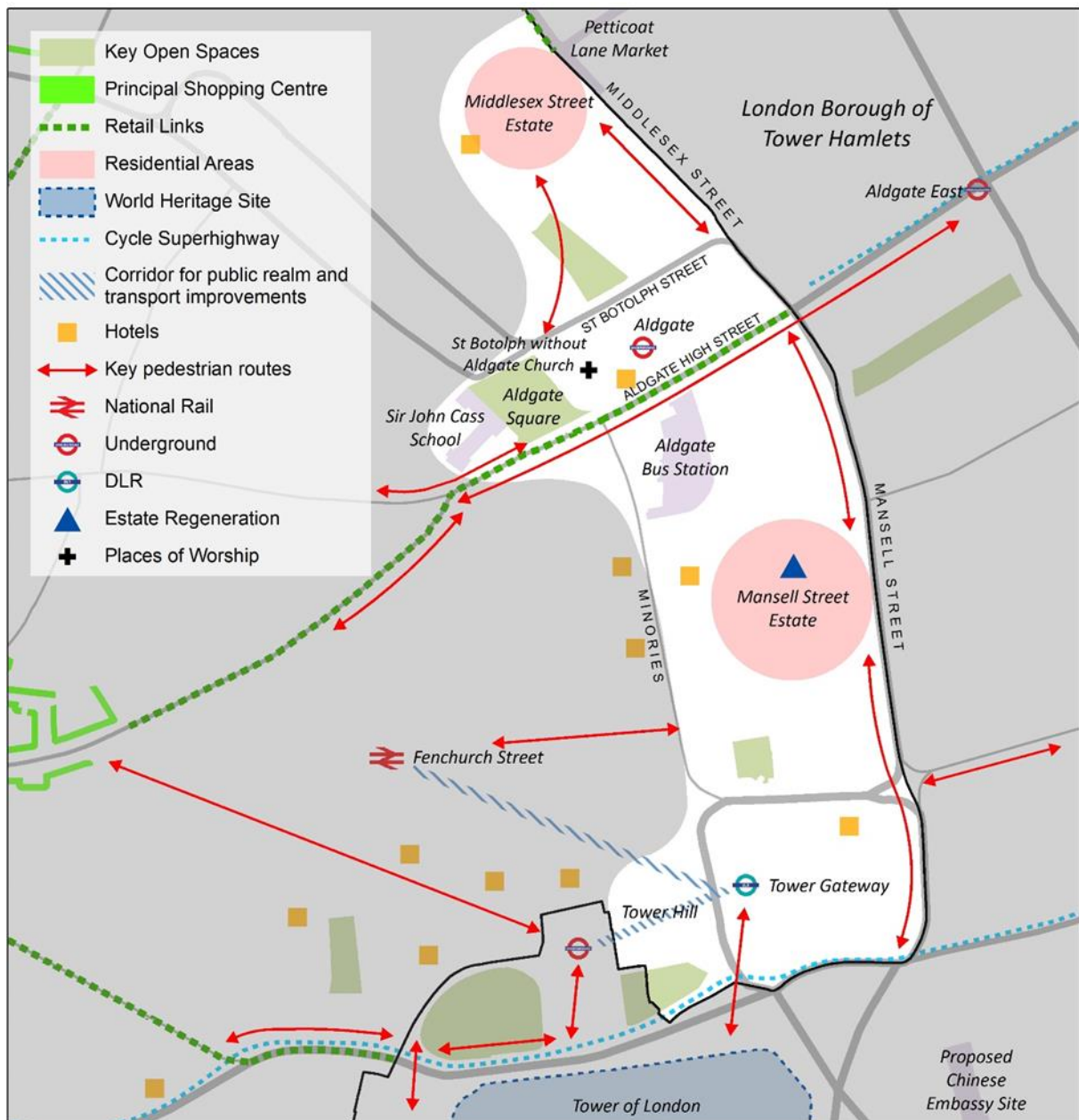


Figure 32: Aldgate & Tower Key Area of Change

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. It contains a concentration 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. Further tall buildings 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. To assist delivery of transformational projects in the Cluster, the City Corporation will support the work of the Eastern City Cluster Partnership in the process to become a Business Improvement District.
- 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.

1. Increasing the provision of world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers.
2. Delivering tall buildings on appropriate sites, including on Renewal Opportunity Sites. These should make a positive contribution to the City's skyline, preserving heritage assets and settings, taking account of the effect on the 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 sites which are less constrained by view protection policies than elsewhere. 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. 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. The Renewal Opportunity Sites have potential to accommodate an uplift in floorspace in new buildings of an appropriate design and height. The City Corporation will continue to use 3D modelling of the Cluster to understand opportunities for redevelopment.

- 7.6.6. The intensification of 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 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 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 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.

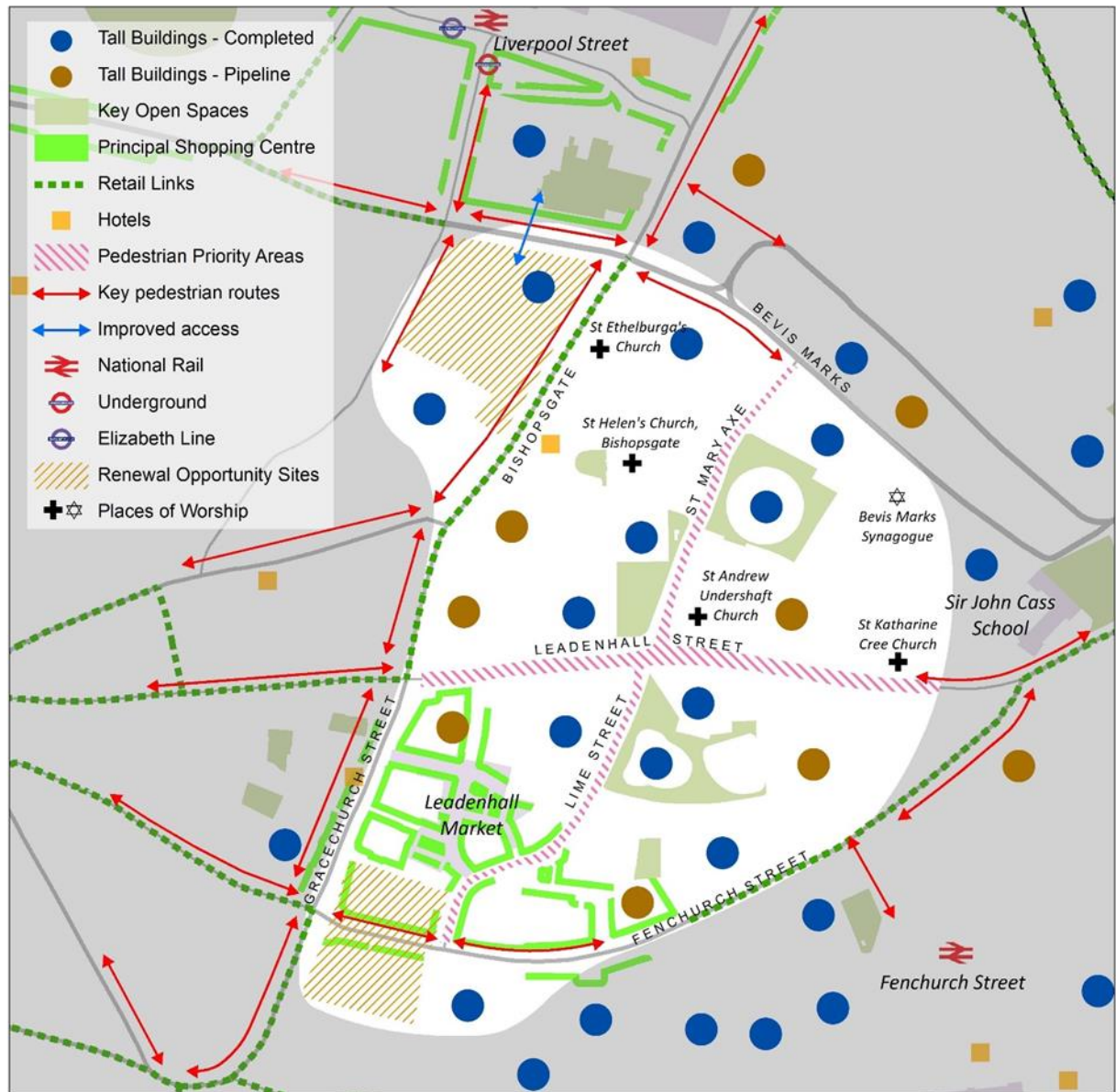


Figure 33: City Cluster Key Area of Change

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 providing iconic views of St Paul's Cathedral. Fleet Street, Ludgate Circus and Ludgate Hill are 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 an opportunity to promote 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 will be promoted as a centre for judicial and related business, a key processional route and a Principal Shopping.

1. Protecting and enhancing the view of St Paul's and the character and appearance of the processional route.
2. Developing new court facilities and City of London Police station, having regard to the impact of the development on the Fleet Street Conservation Area and heritage assets and the need to ensure security of the buildings for court and police use.

3. Continuing to protect existing office use in the area, whilst encouraging the provision of flexible spaces and complementary uses in appropriate locations.
4. Directing further residential development to appropriate sites off principal streets to reinforce existing residential clusters, ensuring a high quality of residential amenity.
5. Retaining retail provision within the Fleet Street Principal Shopping Centre and Retail Link and encouraging extension of retail activity into the evening and weekends, whilst retaining a focus on A1 uses.
6. 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 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, 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 accord 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 Dunstan'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 could support the City's growing visitor economy.

- 7.7.9. The Key Area of Change contains a mix of large modern office developments and smaller scale historic buildings on small plots more suitable for SME use. 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. Heritage and views constraints may limit opportunities for significant increases in floorspace. 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. Fleet Street, Ludgate Hill and Carter Lane suffer from noise from commercial and retail activities, while traffic contributes to poor air quality along parts of Fleet Street and Ludgate Hill. To ensure a high quality of residential amenity, new residential development in this area will be directed to sites away from principal streets, 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. The key streets within the area offer a poor public realm, being heavily trafficked with narrow footways that are congested particularly during peak hours and lunch times. There is limited greenery along Fleet Street, Ludgate Circus and Ludgate Hill. Additional planting will need to consider the impact on 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 Bride's Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement. Other parts of the area where the public realm and street environment offer scope for improvement include Carter Lane and the Whitefriars area to the south of Fleetbank House.
- 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 1960s. The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and

the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and de-cluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral.

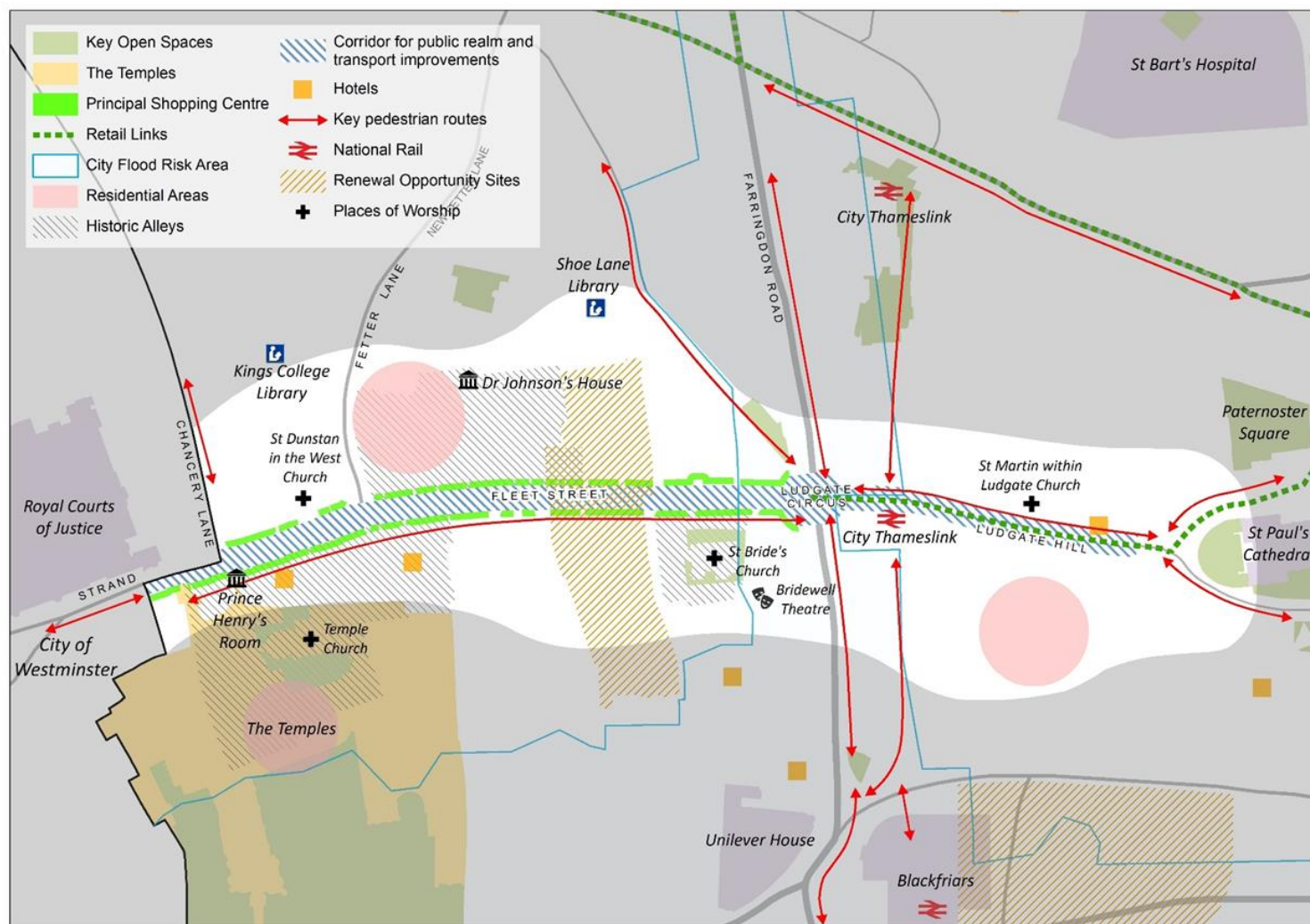


Figure 34: Fleet Street and Ludgate Key Area of Change

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 and Smithfield (principally Barts 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, 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.

7.8.3. Smithfield Market may move from its current location in this period and alternative uses would then need to be found for the historic market buildings. Strategic Policy S25 supports the continued presence of Smithfield Market in the short to medium term, while providing broad guidance on potential future uses if the Market moves during the Plan period.

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

Strategic Policy S23: Smithfield and Barbican

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 seeking to preserve privacy, security and noise abatement for residents and businesses;
- ensuring future alternative uses that are appropriate to the listed status of the market buildings in Smithfield 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 for all within and through the north of the City; and
- supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network.
- 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 London Wall to Smithfield would release its current site for the potential development of a Centre for Music. The City Corporation has taken a decision in principle, subject to feasibility and consultation, to consolidate 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 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, 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 be supported by implementation of public realm enhancement and transportation schemes and greater activation of streets, providing improved amenity, design and movement, for the benefit of workers, residents and visitors. The design of new buildings and spaces would provide greater pedestrian permeability, ensuring that the area is able to accommodate and manage increased volumes of people and activities. A particular concern in this area is the need to improve air quality to protect the health of the 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.

7.8.7. The Citigen plant is located immediately north of the City on Charterhouse Street in Islington, providing heating and cooling to buildings within the City. Subject to future decarbonisation, Citigen offers the potential of low carbon heating and cooling to buildings in this part of the City and new development should, where feasible, be designed to enable connection to the network.

Culture Mile

7.8.8. 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 the Golden Lane estate to 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 hotel uses in appropriate locations, where they are complementary to the City's business role;
- encouraging a diverse leisure, 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;
- public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile and which provide a relevant identity for Culture Mile; and
- Safeguarding cultural uses such as churches and museums.

Reason for the policy

7.8.9. 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 the area.

7.8.10. 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.

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

7.8.12. The City Corporation and partners have 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, 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 the potential for disruption and anti-social behaviour 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 conserve and enhance 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;
- 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

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

7.8.14. The London Borough of Islington has designated the Clerkenwell and Farringdon area as a Cultural Quarter, where development of cultural and creative uses should be focused. It also proposes introducing a new Local Shopping Area extending from Farringdon Station to Smithfield Market along Cowcross Street, which will support development of retail and food, drink and entertainment uses. While these initiatives will complement the Culture Mile, cross-boundary impacts may arise from cultural and night-time economy uses on either side of the boundary between the City and Islington. Proposals for

such uses in Culture Mile will be expected to mitigate any cross-boundary impacts as well as any impacts on City residents and businesses.

7.8.15. Strategic Policy S9 (Vehicular Transport and Servicing) addresses disturbance from vehicle movements as well as disruption to servicing arrangements. Policies HL3 (Noise and Light Pollution) and CV4 (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

7.8.16. 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 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 City Corporation has taken a decision in principle to consolidate its three wholesale markets onto a single site and it is possible that Smithfield Market will relocate to this consolidated wholesale market site during the Plan period. 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 Market in the short to medium term;
- encouraging the future sensitive re-use of the Smithfield 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;
- managing the particular challenges which will result from the late evening, 7 day a week character of the area;

- ensuring new activities and developments contribute to a reduction in freight and vehicular movements whilst not adversely impacting the operation of businesses and amenity of residents; and
- providing for, and supporting, improved pedestrian permeability and the creation of new and enhanced public realm across the area to accommodate cultural activity and increased pedestrian flows arising from the Elizabeth Line and potential new uses in the existing market buildings.

Reason for the policy

7.8.17. The proposed relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line 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.

7.8.18. 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. As a result, it is possible that Smithfield Market 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 operation of the Market in its current location, but also provides guidance requiring future potential uses of the market buildings to maintain the historic character of the existing Grade II* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for 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 Smithfield Market buildings.

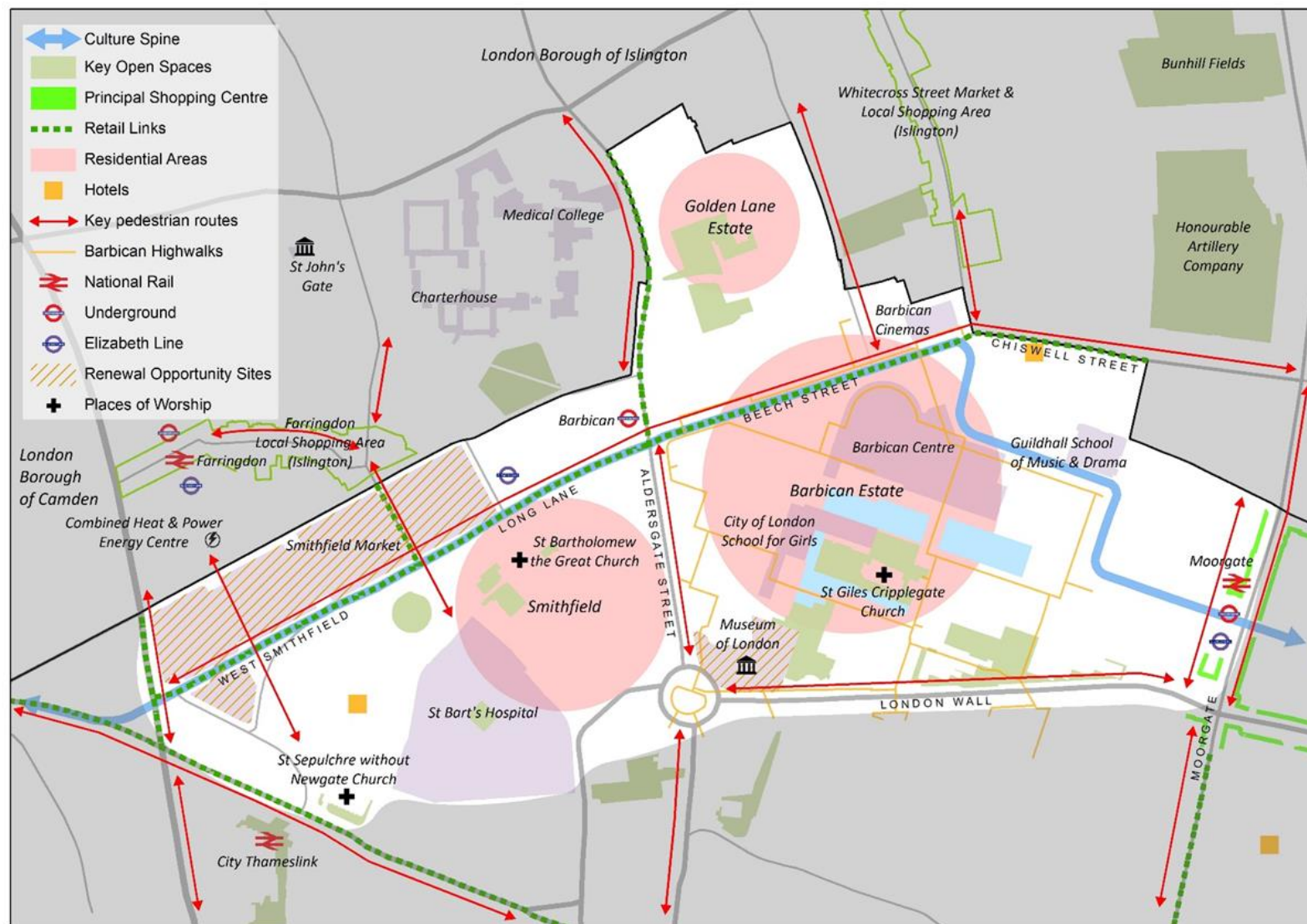


Figure 35: Smithfield and Barbican Key Area of Change

7.9. Liverpool Street Key Area of Change

Context

- 7.9.1. The Liverpool Street area stretches from the City boundary with Shoreditch to the north east, to 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 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 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 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 – will enhance the local office eco-system and strengthen the City’s reputation as a centre for incubators, start-ups and the tech 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 Broadgate by:

- accommodating the increased footfall by maintaining and enhancing walking routes within, to and from the area, including routes to the City Cluster, and improving wayfinding;
- 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, business growth and the development of the tech and fintech eco-system;

- 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 public realm and walking-routes to Petticoat Lane Market, working in partnership with the London Borough of Tower Hamlets, and links to Whitecross Street and Spitalfields markets;
- delivering a high-quality public realm with additional publicly accessible open space and increased greenery;
- supporting improvements to the accessibility and capacity of Liverpool Street Station, including enhancing step free access and improving entry points; 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 Broadgate, provision of more retail floorspace and improvements in surrounding streets, the opening of the Elizabeth Line and significant intensification in the City Cluster to the south. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. Broadgate is currently developing a more 'outward looking' character and this is expected to continue, alongside further improvements to permeability.

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 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. The City Corporation will work with relevant partners such as TfL, Network Rail and train operators to promote improvements to the accessibility and facilities of Liverpool Street Station. This may include enhancing step free access,

improving entry points and reviewing bus interchange, together with any potential future improvements to operational capacity at the station.

- 7.9.7. 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.



Figure 36: Liverpool Street Key Area of Change

8. Implementation

8.1. Planning Contributions

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; and
 - measures to enhance area-wide security, where appropriate.
3. 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 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 Strategic Policies S1, S3 and policy DE1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

8.1.7. Where required, the City Corporation will seek, via s106 planning obligations, Section 278 Agreements with developers to ensure that highway works necessary to make a development acceptable are funded by the developer and implemented by the highway authority.

8.1.8. Further detail on 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.

Policy PC1: Viability Assessments

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

Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.

Reason for the policy

8.1.11. 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 assessment to be submitted in support of the proposed lower level of contributions.

How the policy works

8.1.12. Where viability assessments are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability assessments set out in national Planning Practice Guidance. In particular, assessments must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the 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.

8.1.13. The City Corporation will review viability assessments against the requirements in the Local Plan and London Plan and, where necessary, will seek independent verification of submitted assessments from suitably qualified consultants who have experience of the development market in central London. Verification of viability assessments will consider whether appropriate costs, values and risk rates have been utilised which reflect the ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.

8.1.14. The City Corporation will make all viability assessments submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability assessment should remain confidential in whole or in part, they should provide justification to the City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability assessment public. Where the City Corporation considers that an assessment should remain confidential in whole, or in part, it will keep the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.

- 8.1.15. 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.
- 8.1.16. Strategic 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 regularly 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.

Appendices and Glossary

Appendix 1 - Technical note on applying the Urban Greening Factor

The diagram and table show a theoretical square development site (100m²) showing how it would be analysed in terms of surface cover and areas of each type.



Figure 1: Diagram of simplified theoretical development site

To calculate a UGF score for any proposed development it is necessary to **measure the overall area of the site and then to map and measure the coverage of various surface types** within the site. Scores are then assigned to each surface cover and a calculation of the overall green space factor can begin. The score for each surface cover within a site is multiplied by its area. The formula is shown below.

$$\frac{(\text{Score A} \times \text{Area}) + (\text{Score B} \times \text{Area}) + (\text{Score C} \times \text{Area}) + (\text{Score D} \times \text{Area}) \text{ etc.}}{\text{Total Site Area}}$$

The relevant scores for each type of surface cover in the City of London are set out in Figure 2. Minor adjustments have been made from the GLA scoring system to encourage certain categories of greening which will deliver significant benefits in the

City, particularly tree planting, good quality green roofs (of adequate soil depth) and green walls.

Surface Cover Type	GLA	CoL
Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site	1	1
Wetland or open water (semi-natural; not chlorinated) created on site	1	1
Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – See livingroofs.org for descriptions. ⁶⁸	0.8	0.9
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two-thirds of the projected canopy area of the mature tree -see Trees in Hard Landscapes for overview. ⁶⁹	0.8	0.9
Extensive green roof with substrate of minimum settled depth 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014. ⁷⁰	0.7	0.8
Flower-rich perennial planting – see Centre for Designed Ecology. ⁷¹	0.7	0.7
Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case studies. ⁷²	0.7	0.7
Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance ⁷³	0.6	0.6
Standard trees planted in pits with soil volumes less than two thirds less than the projected canopy area of the mature tree.	0.6	0.7
Green wall – modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview. ⁷⁴	0.6	0.7
Groundcover planting – see RHS Groundcover Plants for overview ⁷⁵	0.5	0.5
Amenity grassland (species-poor, regularly mown lawns)	0.4	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014. ⁷⁶	0.3	0.3
Open water (chlorinated) or unplanted detention basins	0.2	0.2
Permeable paving - see CIRIA for overview ⁷⁷	0.1	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0	0

Figure 2: City of London UGF Scores compared with GLA scores in London Plan (See Table 9 in Urban Greening Factor Study Report)

Appendix 2 – Historic England Advice

Note 7 Selection Criteria

This is taken from Historic England Advice Note 7: Local Heritage Listing and sets out commonly applied selection criteria for assessing the suitability of heritage assets for local heritage listing.

Criterion	Description
Age	The age of an asset may be an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions.
Rarity	Appropriate for all assets, as judged against local characteristics
Aesthetic Interest	The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics.
Group Value	Groupings of assets with a clear visual design or historic relationship.
Archaeological Interest	The local heritage asset may provide evidence about past human activity in the locality, which may be archaeological – that is in the form of buried remains – but may also be revealed in the structure of buildings or in a manmade landscape. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
Archival Interest	The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record.
Historical Association	The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures. Blue Plaque and other similar schemes may be relevant.
Designed Landscape Interest	The interest attached to locally important historic designed landscapes, parks and gardens which may relate to their design or social history. This may complement a local green space designation , which provides special protection against development for green areas of particular importance to local communities for their current use.
Landmark Status	An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene.
Social and Communal Value	Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence, sometimes residing in intangible aspects of heritage, contributing to the 'collective memory' of a place.

Glossary

Explanation of terms used in the City of London Local Plan.

* Terms explained elsewhere in the glossary are marked with an asterisk.

Accelerator office space

An office location which provides mentorship, advice, and resources to help start-ups succeed and grow rapidly, normally let on a short-term basis.

Affordable housing

Affordable housing is defined primarily by affordability and not by tenure. It comprises 'social rented housing', 'affordable rented housing' and 'intermediate housing', provided to eligible households whose needs are not met by the market. Social rented housing is at rents no greater than target rents set by government for local authority, Registered Social Landlords* (RSL) and cooperative tenants. Affordable rented housing has the same characteristics as social housing but is offered at up to 80% of local market rentals (including service charges, where applicable).

Intermediate housing is housing for sale and rent where costs are above target rents for social rented housing but are at least 20% below local market levels and are affordable by households on moderate incomes. Intermediate housing can include shared equity (shared ownership and equity loans), starter homes, discounted market sales housing and other sub-market rented and key worker provision.

Affordable workspace

Workspace that is provided at rents maintained below the market rate for that space for a special social, cultural, or economic development purpose.

Agent of Change

The principle that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed,

Air Quality Impact Assessment

An assessment of the impact of a development on the levels of certain pollutants in the local area, which could include: a description of baseline conditions and how these could change; relevant air quality concerns; the assessment methods to be adopted and any requirements around verification of modelling air quality; sensitive locations; the basis for assessing impact and determining the significance of an impact; construction phase impact; and/or acceptable mitigation measures.

Air Quality Neutral

Assessment of air quality against benchmarks set by the Mayor of London through his Sustainable Design and Construction SPD 2014. Developments that do not exceed these benchmarks will be considered to avoid any increase in NOx and PM emissions across London as a whole and therefore be 'air quality neutral'.

Apart-hotel

Accommodation for short or medium-term stays that generally provide more amenities for daily use (such as a small kitchenette) than standard hotel accommodation. They have a reception area where customers can access services without pre-booking and are available on a nightly basis without a deposit being required against damages.

Biodiverse green roofs

A biodiverse green roof should include a varied substrate depth, planted and or seeded with a wide range of wildflowers (sedums can be added). A biodiverse green roof should have a sufficient depth of between 80 - 150mm.

Biodiversity

The variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity Action Plan

The Biodiversity Action Plan (BAP) provides a framework to ensure all legislative requirements relating to the management of green spaces are taken into consideration at all times and both identifies and prioritises actions for biodiversity at a local level.

BREEAM assessment

The Building Research Establishment Environmental Assessment Method (BREEAM) is a sustainability assessment method that sets standards for the environmental performance of buildings through the design, specification, construction and operation phases and can be applied to new developments or refurbishment schemes. It focuses on sustainable value across range of categories: energy; land use and ecology; water; health and wellbeing; pollution; transport; materials; waste; management.

Build to Rent

Homes built specifically for private renting rather than for sale which meet criteria set out in Policy H11 Build to Rent in the Intend to Publish London Plan, December 2019.

Business Eco-System

A network of organisations, including suppliers, distributors, customers, competitors and government agencies, involved in the delivery of a specific product or service.

Business Improvement District

A defined area in which a levy is charged on all business rate payers in addition to the business rates to develop projects that will benefit businesses in the local area.

Cash in lieu / commuted sums

Payments of money received from developers instead of the provision of affordable residential units in the City of London. The money is pooled and used by the City Corporation when opportunities to develop affordable housing arise.

CAZ - Central Activities Zone

The area defined in the London Plan* where planning policy promotes financial and business services, specialist retailing, tourist and cultural uses and activities. The City is wholly within the CAZ.

Changing Places toilets

These meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide the right equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and carer, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.

Circular economy

An economy which keeps resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.

CIL - Community Infrastructure Levy

A statutory charge on new development used to contribute towards the funding of infrastructure provision. The City Corporation has prepared a CIL charging schedule that was implemented in July 2014.

Comparison goods

Comparison goods are those bought relatively infrequently, so consumers usually compare prices, features and quality before making a purchase. They may include items such as clothes, electrical items, household and leisure goods.

CAAC - Conservation Area Advisory Committee

A consultative group set up to advise on planning applications and other proposals in the City's conservation areas.

Construction Logistics Plan

A travel plan that aims to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the street network.

City Flood Risk Area

Area of the City which is susceptible to flooding from the River Thames, surface water or the sewer network.

Creative enterprises / Creative industries

Defined by the Department for Digital, Culture, Media and Sport* as those industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property. They include architecture; advertising & marketing; crafts, product, graphic & fashion design; film, TV, radio and photography; IT, software & computer services; museums, galleries & libraries; music, performing & visual arts, and publishing.

Culturally significant object

Objects which people identify and value and which reflect their evolving knowledge, culture, beliefs and traditions.

Decentralised energy

Energy that is generated close to the place where it is used, so that transmission of electricity, heat and other energy carriers are minimised.

Deconstruction

The act of breaking down a building into components or dismantling - this allows for recycling of the resulting materials. Different to demolition which involves wrecking, destroying or tearing down completely.

DSP - Delivery and Servicing Plan

A plan that shows how a development will proactively manage delivery and servicing arrangements.

DCMS - Department for Digital, Culture, Media and Sport

The government department of state whose responsibilities include recreation, the arts and historic buildings.

Development Management

The process by which the City Corporation (and, where appropriate, the Mayor of London and Secretary of State) determine applications for planning permission and related consents. Applications are decided with regard to the development plan*, NPPF* and other material considerations.

Design and Access Statement

A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with.

Design Council / CABE

Advisor to central and local government on good design. It includes the Commission for Architecture and the Built Environment (CABE).

Development Plan

The statutory documents that together set out the planning policies for an area. In the City the development plan comprises the Mayor's London Plan* together with the City's Local Plan*.

DPD - Development Plan Document

Statutory planning policy document whose preparation process includes public examination. There is one adopted DPD in the City: the Local Plan DPD*.

Embodied carbon

The total life cycle carbon used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Freight consolidation

Combining goods shipments into fewer deliveries to reduce the number of freight vehicles required to service a building. This can be achieved through the physical consolidation of goods at an off-site location and/or through methods such as preferred supplier schemes and common procurement strategies.

Historic England

The body responsible for advising the government, local authorities and others on historic buildings and archaeology.

GLA - Greater London Authority

The GLA comprises the Mayor of London* (who has an executive role and makes decisions on behalf of the GLA) and a separately elected Assembly (a body of 25

elected Members which has a scrutiny role and is responsible for appointing GLA staff).

Green corridors

Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access routes.

Green infrastructure

A strategically planned, designed and managed network of green spaces and other features vital to the sustainability of any urban area. This includes (although not exclusively) trees, green roofs and walls, green corridors*, and blue infrastructure such as water spaces and natural drainage features.

HRA - Habitats Regulations Assessment

The purpose of the Habitats Regulations Assessment is to identify any aspects of an emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects are identified.

There is a legal requirement for all Local Plans to be subject to a HRA, set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2017.

HIA - Health Impact Assessment

A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques. The HIA of the City Local Plan is incorporated into the Integrated Impact Assessment*.

Heritage asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets include World Heritage Sites*, Scheduled Monuments, Listed Buildings*, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest but have not been formally designated.

Hostile vehicle mitigation

Structural measures that prevent access to, or close proximity of, unscreened vehicles to a building or space, or measures that reduce the speed of vehicles approaching a site or its defences.

Housing trajectory

A projection of the number of new homes expected to be added to the City's housing stock over a given time period.

Inclusive design

Consideration at the design stage to ensure that development makes provision for everyone regardless of disability, age, gender, ethnicity, faith or economic circumstance and addresses the needs of those with mobility difficulties, poor vision and other physical disabilities.

Incubator office space

Dedicated office space aimed at start-ups and normally let for a set period of time.

Infrastructure

Term used to describe the facilities and services necessary for people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new public transport facility or school, to the creation of a local play space.

Infrastructure Funding Statement

Proposed statutory statement reporting on the level of developer contributions received through the Community Infrastructure Levy* and s106 planning obligations and setting out spending priorities for the next 5 years.

IIA - Integrated Impact Assessment

An assessment process which considers the impacts of policies and proposals within statutory plans against environmental, equality, health, and community safety objectives. The City Plan 2036 IIA comprises three areas of assessment:

- a Sustainability Assessment and Strategic Environmental Assessment - required by EU Directive to assess the social, economic and environmental impacts of new policies;
- an Equality Analysis - related to the City Corporation's duties under the Equalities Act 2010 and the Crime and Disorder Act 1998, and assessing the impact of new policies on people of different ethnicities;
- a Health Impact Assessment*.

The IIA seeks to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation.

Listed building

A building or structure protected because of its historic or architectural interest. The list of such buildings is drawn up by Historic England* and the Department for Digital, Culture, Media and Sport*.

LDD - Local Development Document

Documents containing policies and guidance, comprising Development Plan Documents*, Supplementary Planning Documents* and the Statement of Community Involvement*.

LDS - Local Development Scheme

Timetable and project plan for producing the Local Plan.* It is regularly updated.

LIP - Local Implementation Plan

Statutory transport plan produced by London Boroughs and the City Corporation bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

Local Plan

Document setting out the strategy, vision and policies and proposals for planning the City.

London Plan (Spatial Development Strategy)

Prepared by the Mayor of London*, it provides a London-wide planning strategy and the City's Local Plan* must generally conform to it.

LVMF - London View Management Framework

Guidance by the Mayor of London* on the protection of important views, including those of St Paul's Cathedral and the Tower of London.

Major development

Residential development of 10 or more dwellings or on a site of 0.5 hectares or more, and all other development of 1,000m² gross or more floorspace, or on a site of 1 hectare or more.

Mayor of London

The Mayor is the executive head of the Greater London Authority* and is also responsible for a number of related organisations, including Transport for London,* Homes for London Board and the Metropolitan Police Authority. The Mayor prepares London-wide strategies, including those for planning (the London Plan*), transport, waste, energy, economic development, housing and air quality. He has powers to direct decisions on large planning applications.

Meanwhile use

A use which is to last for a limited time, or one which is limited in its operation for a particular period of time. Meanwhile is defined as at or during the same time, while something else is being done.

MHCLG - Ministry of Housing, Communities and Local Government

The government department of state whose responsibilities include town planning.

Municipal waste

Waste collected by a local authority, including domestic waste and street cleansing waste. It also includes commercial waste collected by the authority, although waste producers may also have this privately collected.

NPPF - National Planning Policy Framework

The government's statement of planning guidance to local planning authorities, issued by the Department of Communities and Local Government*. The latest version was published in February 2019. The City Corporation must take account of it in preparing and implementing its planning policies.

Noise Assessment

A technical assessment which identifies whether the overall effect of the noise exposure of a building (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation:

Significant observed adverse effect level: the level of noise exposure above which significant adverse effects on health and quality of life occur.

Lowest observed adverse effect level: the level of noise exposure above which adverse effects on health and quality of life can be detected.

Offsetting measures

The measures permitted for dealing with residual emissions remaining after taking account of energy efficiency and decentralised and low carbon energy sources e.g. retrofitting works undertaken by a developer to improve the energy efficiency of existing buildings in the vicinity of the development; export of low carbon heat from the development to other developments; or investment in low carbon community heat infrastructure.

Open space

Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

Permitted development rights

A national grant of planning permission which allows certain building works and change of use to be carried out without having to secure planning permission.

Pipe subway

Tunnels, mainly under streets, that accommodate utilities such as gas and water pipes and electricity and telecommunications cables, providing a more efficient alternative to burying these in the ground.

Planning obligations / s106 agreements

Legal agreements negotiated between the City Corporation and developers (or offered unilaterally by developers) setting out financial and non-financial undertakings to mitigate the direct impact of development. Also known as section 106 Agreements, or s106 planning obligations. From July 2014 some financial planning obligations in the City have been replaced by the Community Infrastructure Levy*.

PPG - Planning Practice Guidance

An online resource which brings together national guidance on various topics in one place and explains the policies in the National Planning Policy Framework (NPPF)* in more detail.

Policies Map

A map accompanying the Local Plan* showing where its policies apply to specific locations.

PSC - Principal Shopping Centre

Significant clusters of retail activity within the City of London, which are the local expression of the London Plan's CAZ Retail Clusters. There are 4 PSCs within the City of London: Cheapside, Moorgate/Liverpool Street, Leadenhall Market and Fleet Street.

Public Examination

The Local Plan* will be subject to public examination before an independent planning inspector. The inspector assesses the "soundness" of the Local Plan.

Public realm

Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

Registered Provider

Not for profit providers of affordable* and other social housing, including housing associations and regulated by Government.

Renewal Opportunity Sites

Principal opportunities for accommodating large scale development, which may include refurbishment or redevelopment of existing buildings.

Residential amenity

The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.

Retail Impact Assessment

An assessment undertaken for an application for retail use on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

Safeguarded wharves

Sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes. A list of those sites that are currently protected and those proposed for protection is available in 'Safeguarded Wharves on the River Thames', GLA, 2005.

Safer City Partnership

A partnership, comprising representatives from a range of City interests, whose aim is to reduce the level of crime, disorder, antisocial behaviour, terrorism and substance misuse in the City.

Secured by Design

A crime prevention initiative, to encourage those involved in the development industry to adopt crime prevention measures to assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment.

Short term residential letting

Letting of residential property on a non-permanent basis. Under the Deregulation Act 2015, short term residential letting of domestic premises which are liable for council tax for less than 90 days in a calendar year does not require planning permission. Letting for periods of more than 90 days will require permission

SINCs - Sites of Importance for Nature Conservation

The Greater London Authority* designated SINCs to highlight areas of ecological value in the City. The sites are graded as being of Metropolitan, Borough or Local importance.

Smart infrastructure

Infrastructure which includes sensors that produce, analyse and help to securely share data on the performance of the built and natural environment.

Social and community facilities

Social and community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments. The majority of social and community facilities fall within C2 (Residential Institutions), D1 (Non-residential Institutions) and D2 (Assembly and Leisure) use classes. Community facilities include:

- Leisure and cultural facilities (including arts, entertainment and sport facilities)
- Community centres and meeting places (including places of worship)
- Libraries
- Facilities for children (from nursery provision to youth clubs)
- Education (including adult education)
- Healthcare facilities

Strategic Cultural Areas

Areas identified in the London Plan* with internationally important cultural institutions, which are also major tourist attractions, and include the West End, South Bank/Bankside/ London Bridge, Barbican, Wembley, the South Kensington museum complex/Royal Albert Hall, London's Arcadia, Olympic Park and Lee Valley Regional Park.

Street hierarchy

Categorisation of streets in the City of London Transport Strategy* which describes the function of every street in terms of motor traffic:

- London Access Streets (TfL network): Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.
- City Access Streets: Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations.
- Local Access Streets: Primarily used for the first or final part of a journey, providing access for vehicles to properties.

SHLAA - Strategic Housing Land Availability Assessment

A technical assessment to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework*, paragraph 67).

In London, the Mayor of London* carries out a London-wide SHLAA to inform the London Plan* as it determines housing targets for each borough and the City of

London. The City of London Local Plan relies on the land availability evidence provided by the London-wide SHLAA.

SHMA - Strategic Housing Market Assessment

An assessment of future housing requirements in an area. The assessment informs the development of local and strategic plan strategies and housing targets and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period including addressing the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

Strategic developments (applications referable to the Mayor)

The planning applications that must be referred to the Mayor of London* under the Town and Country Planning (Mayor of London) Order 2008 and any amendments hereto.

SA - Sustainability Appraisal

The Local Plan* is subject to SA, which ensures that it is soundly based on the principles of sustainable development. SA is carried out as the policies are developed or reviewed so that they can take account of its findings. The SA of the City Plan 2036 has been combined with other assessment processes in an Integrated Impact Assessment (IIA)*.

SEA - Strategic Environmental Assessment

The environmental assessment of plans, required by EU Directive 2001/42/EC. It is carried out as part of the sustainability appraisal*.

SCI - Statement of Community Involvement

A plan for public consultation on planning policy documents and planning applications. The City Corporation's SCI was adopted in 2016.

Strategic Flood Risk Assessment

A document prepared by the Local Planning Authority to provide information on areas that may flood and on all sources of flooding as required by the NPPF*.

SPD - Supplementary Planning Document

A document that explains the policies of the Local Plan* in detail. It is subject to consultation, but not public examination*.

SPG - Supplementary Planning Guidance

Guidance prepared by the Mayor of London* to explain policies of the London Plan*.

SuDS - Sustainable Drainage Solutions

A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.

Traffic and Environmental Zone

A security and surveillance cordon that surrounds the City of London. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City.

Transport Assessment

This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.

TfL - Transport for London

The body, under the control of the Mayor of London*, responsible for strategic transport policy and the provision of public transport, including buses and the underground. TfL is responsible for certain major streets in the City.

Transport Strategy

A strategy for the future planning of transport in the City of London which provides a 25 year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestions.

Travel Plan/Cycling Promotion Plan

A long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.

Tower of London World Heritage Site Consultative Committee

A committee of experts and policy makers providing guidance for the preparation and implementation of the Tower of London Management Plan, and comprising representatives from: Historic Royal Palaces, City Corporation, Historic England*, GLA*, International Council on Monuments and Sites (ICOMOS), Department of Culture, Media and Sport* (DCMS) and the London Boroughs of Southwark and Tower Hamlets.

UNESCO - United Nations Educational, Scientific and Cultural Organisation

Among UNESCO's responsibilities are the inscription of World Heritage Sites, which include the Tower of London.

Urban greening

A process for delivering additional green infrastructure in the City of London. Due to the morphology and density of the built environment in the City, green roofs, green (or living) walls, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.

Urban Greening Factor

A model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.

Urban heat island

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, central London can be up to 10°C warmer than the rural areas around London. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

Use Classes Order

A statutory instrument made by the Secretary of State under Section 22 of the Town and Country Planning Act 1990, subsequently amended several times, setting out broad classes of use for land and buildings.

Viability Assessment

An assessment of the financial viability of a development to determine the maximum level of affordable housing that can be provided and compliance with other policy requirements.

Waste management

The London Plan's* definition of waste management includes its use for energy recovery or composting or recycle sorting and bulking but does not include waste transfer.

Well Building Standard

An accreditation system that attempts to measure how building features impact on health and wellbeing.

Wheelchair accessible

Homes built to Building Regulation Requirement M4 (3) (2) (b): Wheelchair user dwellings, where the dwelling is constructed to meet the needs of occupants who use wheelchairs.

Also includes hotel rooms which are built to be accessible to guests who use wheelchairs.

Wheelchair adaptable

Homes built to Building Regulation Requirement M4 (3) (2) (a): Wheelchair user dwellings, where the dwelling is constructed to allow simple adaptation to the dwelling to meet the needs of occupants who use wheelchairs.

Windfall development/sites

Housing development that does not take place on sites identified in the Development Plan* or on the Policies Map* but is brought forward by developers.

World Heritage Site

A site inscribed by UNESCO* for its Outstanding Universal Value. The Tower of London, located just outside the City's boundaries, is designated as a World Heritage Site.

Zero carbon

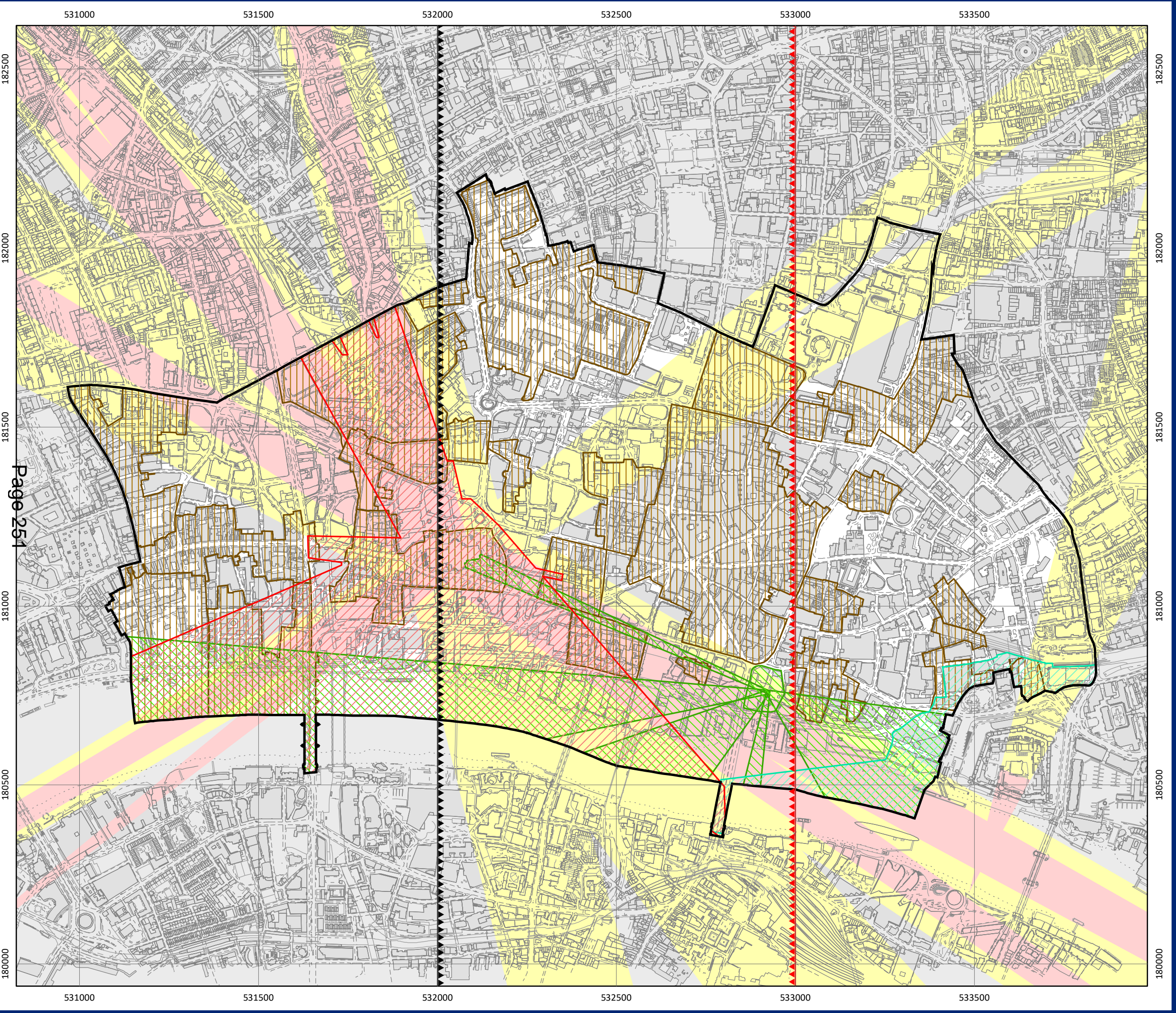
Activity that causes no net release of carbon dioxide or other greenhouse gas emissions into the atmosphere.

Zero waste

Making the most efficient use of resources by minimising the City of London's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.

Zero Emission Zone

Defined area where access by some polluting vehicles is restricted or deterred with the aim of improving air quality.



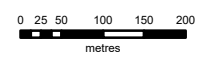
CITY OF LONDON
LOCAL PLAN
PROPOSED SUBMISSION DRAFT
POLICIES MAP A
June 2020

KEY	
	Administrative Boundary of the City of London
Historic Environment	
	Conservation Areas
	Tower of London World Heritage Site - Local Setting Area
Tall Buildings and Protected Views	
	London View Management Framework - Protected Vista Landmark Viewing Corridors
	London View Management Framework - Protected Vista Wider Setting Consultation Areas
	St Paul's Heights Policy Area
	Monument Views and Setting
	London City Airport Safeguarding Area
	London Heathrow Airport Safeguarding Area
Policy No.	
	S11 HE1
	S11 & S13 HE3
	S12 & S13
	S12 & S13
	S12 & S13
	S12
	S12

This Policies Map is one of two covering the City of London. See also Policies Map B.

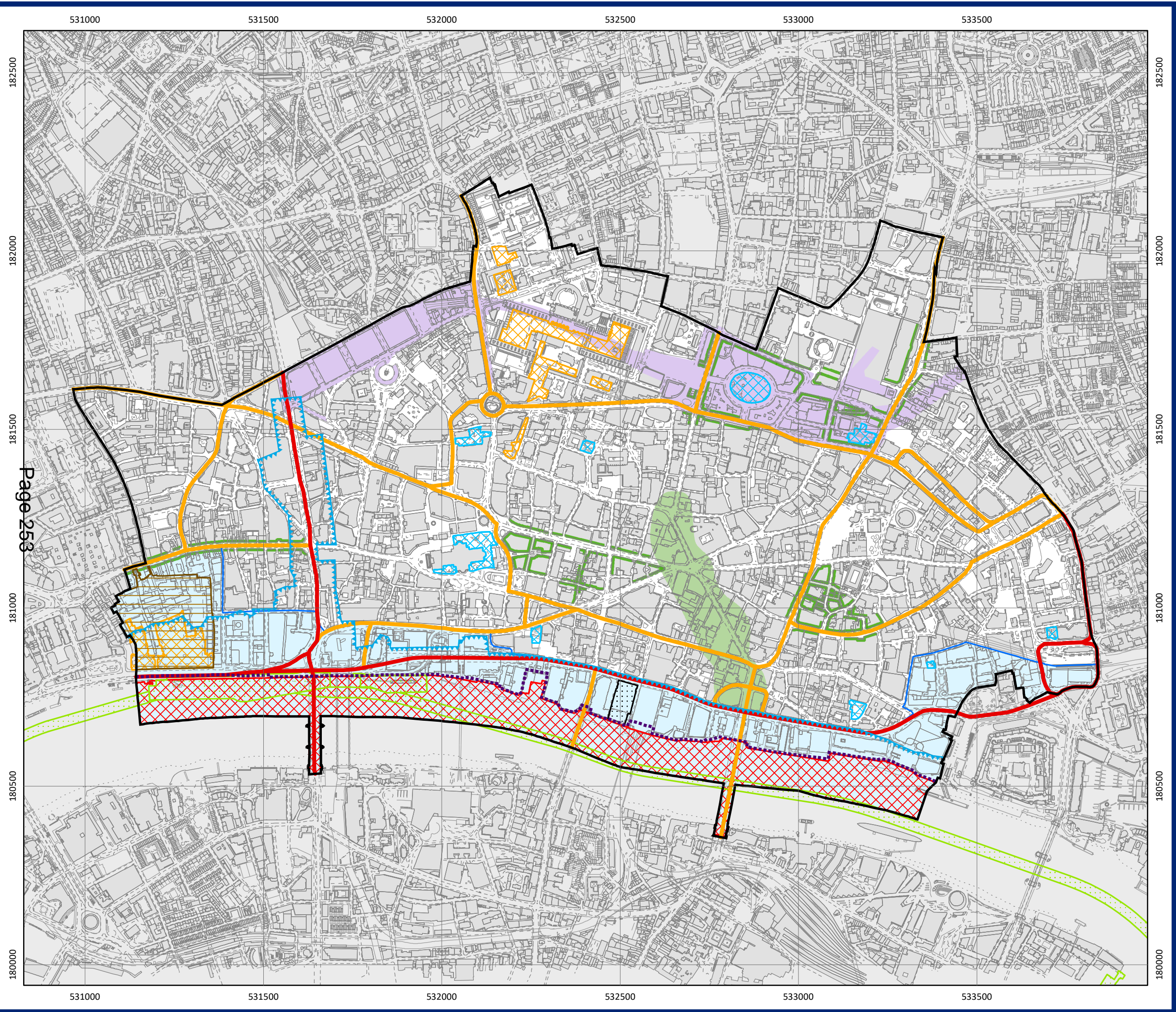


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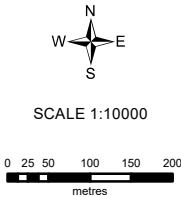
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CITY OF LONDON
LOCAL PLAN
PROPOSED SUBMISSION DRAFT
POLICIES MAP B
June 2020

KEY	
	Administrative Boundary of the City of London
	Thames Policy Area
	Thames Tideway Tunnel Safeguarding Area
	Riverside Walk
Vehicular Transport and Servicing	
	Crossrail Safeguarding Area
	Bank Station / Northern Line Upgrade Safeguarding Area
	London Access
	City Access
Open Spaces and Green Infrastructure	
	Site of Metropolitan Importance for Nature Conservation
	Site of Borough Importance for Nature Conservation
	Site of Local Importance for Nature Conservation
Climate Resilience and Flood Risk	
	City Flood Risk Area
Circular Economy and Waste	
	Safeguarded Wharf
Retail	
	Principal Shopping Centre
Housing	
	The Temples

This Policies Map is one of two covering the City of London. See also Policies Map A.



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Integrated Impact Assessment: Non-Technical Summary - March 2020

IIA scope

The Integrated Impact Assessment (IIA) for the City incorporates: Sustainability Appraisal (SA), Health Impact Assessment screening (HIA) and Equalities Impact Assessment screening (EqIA). The assessment covers the requirements for Strategic Environmental Assessment seeking to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation. This non-technical summary outlines the information required in environmental reports (Schedule 2 Environmental Assessment of Plans and Programmes Regulations 2004)

1) The City Plan 2036 and its relationship with other plans and programmes

The City Plan 2036 will replace the adopted Local Plan 2015 as the primary policy document for Planning in London's central business district. It will guide development in the City through planning policies, contributing to the overall objectives of a flourishing society, thriving economy and outstanding environments. As the plan for spatial development in the City it must take account of a wide range of other plans and programmes at international, national, regional and local level as set out in section 4.1. These other plans and programmes include environmental targets which the City Plan 2036 must contribute to realising.

2) Current state of the environment

Economy – As a globally important business district the City's predominant land use is offices. The area contributes to local, regional, national and international prosperity and relies on wider transport, utility and housing infrastructure to ensure its success. The City's workforce is predicted to grow by over 110,000 during the period of the plan. Without a plan the City would be unable to provide suitable office space to accommodate this increased workforce, taking account of new styles of working and accompanying infrastructure requirements.

Environment – Covering one square mile, the City has numerous pockets of open space and is bounded to the south by the River Thames site of metropolitan importance for nature conservation. In common with the rest of central London it has poor air quality, is a major contributor to carbon emissions and generates significant quantities of waste which must be transported elsewhere for treatment. Without a plan the pressure for development to accommodate additional workers could result in encroachment into the City's valuable open spaces with impacts on biodiversity, urban cooling, recreation and health. Lack of planning for transport, waste and air quality would result in degradation of the environment within and beyond the City. Planning for altered weather patterns as a result of climate change will become increasingly important during the plan period.

Social – The City has a low resident population with around 8,000 people living in the City and a high proportion of second homes. Over 520,000 people work in the City many of whom commute daily from a wide area to access workplaces, although working patterns are changing. The resident population relies on an effective Local Plan for protection of their residential amenity. Without such protection residents could be subject to excessive noise, antisocial behaviour and inconvenience associated with

living in a business district. The health and wellbeing of the City's workers and residents could be compromised if insufficient recreation, relaxation and health facilities were developed. Without changes to the adopted Local Plan the City's aspiration to develop Culture Mile around the Barbican Centre would be less likely to progress.

Further details of the issues the City faces are set out in section 4.3.

3) Environmental characteristics of areas likely to be affected

As a high-density urban environment, the City and surrounding areas suffer from poor air quality, urban heat island effect, noise and have a high potential for land and water pollution as a result of contaminated water run-off (section 4.2). Wider initiatives on air and water quality such as the London Ultra Low Emission Zone and the Thames Tideway Tunnel will improve some aspects, but the City's Local Plan is an essential element in implementation of these initiatives within the City.

4) Designated areas

There are no designated European sites within the City of London boundary but there are two which lie wholly or partly within a 10km buffer area:

- Epping Forest SAC
- Lea Valley SPA and Ramsar site

A separate Habitats Regulations Assessment Screening has been carried out which concludes that *"the City of London Draft Local Plan 'City Plan 2036' is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA"*.

5) Environmental protection objectives

The likely effects of the policy options and draft policies of the City Plan 2036 were appraised by reference to a framework of social, environmental and economic objectives and supporting criteria, which include health and equalities objectives (Section 3.5). These were informed by a review of other plans and programmes and identification of sustainability issues and problems facing the City and were subject to consultation at the scoping stage.

6) Significant effects of the City Plan 2036 policies

Assessment of the City Plan 2036 objectives against the City's IIA objectives (section 5.2) showed general agreement between the IIA aspirations and the objectives of the plan. This assessment assisted in strengthening the City Plan 2036 objectives, further promoting sustainability through the Outstanding Environments objective and heritage protection through the Key City Places objective.

The assessment of the proposed submission City Plan 2036 policies against the IIA objectives (section 5.6) demonstrates that the impact of the plan will be largely positive as summarised below.

Parameter	Effect of draft City Plan 2036 (significant effects are marked in bold text)
Biodiversity Fauna and Flora	The protection of open spaces, incorporation of urban greening targets, climate mitigation and resilience will have positive impacts on biodiversity flora and fauna. Significant positive impacts on local biodiversity should result from implementation of the open spaces and green infrastructure policies.
Population and Human Health	Emphasis on health and wellbeing for a flourishing society, healthy streets approach and protection of residential amenity and pollution prevention have positive impacts for population and human health. Policies aimed at accommodating higher population numbers (residential and workers) will mitigate against the impact of congestion on health. Significant positive impacts on health and environmental protection will result from the healthy and inclusive City policies.
Soil, Water and Air	Transport, air quality, flood risk and design policies all contribute to improving soil water and air quality in the City. Wider initiatives at a London and national scale will contribute to this improvement. Policies for the Thames riverside and air quality, contaminated land and water quality will have significant positive impacts on soil, water and air.
Climatic factors	Design policies coupled with transport policies which promote zero emissions active travel are key to reducing the City's carbon emissions. Flood risk and design policies are also key to ensuring that the City remains safe and comfortable in a changing climate. No significant climate impacts were identified from the implementation of the plan due to the small geographic area covered.
Material assets	The quality of the City's buildings and spaces is secured through a range of City Plan 2036 policies including safe and secure City, visitors arts and culture, open spaces. The City's Key Areas of Change policies reinforce the emphasis on quality buildings and spaces generating significant local positive impacts.
Cultural heritage and Landscape	Protection for heritage assets and views management ensures that the City's cultural heritage is conserved for future generations and landscapes are retained which preserve views of landmark buildings from distant viewing points. Significant positive impacts on cultural heritage will result from Culture Mile, Smithfield and Barbican area policies.

The assessment of the draft City Plan 2036 has been carried forward unchanged to the proposed submission stage for the majority of policies. Where significant changes have been made to the Plan as a result of consultation responses, new evidence, legislative changes and IIA findings these changes have been assessed. This includes aspects of policies on air quality, health, housing, design, historic environment, protected views and trees. The IIA of these changes demonstrates that the changes will have mainly positive impacts. In some cases, the change results in more positive impacts at proposed submission stage e.g. extending the Fleet Street policy to include Ludgate Hill has resulted in a significant positive impact for the heritage assets objective. The opportunity has also been taken to review the assessments from the draft Plan stage in the light of updated evidence and to correct any apparent inconsistencies in the scoring framework, for instance with regard to the relative impacts of the various Key Areas of Change.

Summary of the impacts of Proposed Submission City Plan 2036 policies against IIA objectives

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
Contribute to a Flourishing Society																
S1	Healthy & Inclusive City			-	-	-										
S2	Safe & Secure City				-	-	-	-		-			-		-	
S3	Housing			-	-	-	-	-	-	-			-	-	-	
Support a Thriving Economy																
S4	Offices			-					-	-			-	-		
S5	Retail								-	-				-	-	
S6	Culture, Visitors Night Economy															
S7	Smart Utilities & Infrastructure			-					-	-		-	-	-	-	-
Shape Outstanding Environments																
S8	Design											-	-		-	
S9	Vehicle Transp. Servicing				-				-	-		-	-		-	-
S10	Active Travel & Healthy Streets				-	-				-		-	-		-	
S11	Historic Environment			-		-	-	-			-	-		-		
S12	Tall Buildings					-		-		-	-	-	-	-	-	
S13	Protected Views			-		-	-	-	-	-	-	-	-	-	-	-
S14	Open Space Green Infrastructure					-						-			-	
S15	Climate resilience Flood Risk			-		-					-				-	-
S16	Circular Economy and Waste				-				-	-		-	-		-	-
Key Areas of Change																
S17	Thames Policy Area											-		-	-	-
S18	Blackfriars											-		-	-	-
S19	Pool of London													-	-	-
S20	Aldgate & Tower															
S21	City Cluster											-				-
S22	Fleet Street & Ludgate					-	-	-					-	-	-	-
S23	Smithfield & Barbican													-		-
S24	Culture Mile						-	-	-	-				-		
S25	Smithfield						-	-	-	-					-	-

Policy Numbers	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
S26	Liverpool Street						-	-				-			-	-
Implementation																
S27	Planning contributions				-	-	-		-	-			-	-		

Key

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

7) Mitigation measures

A small number of negative effects and a number of uncertainties were identified and assessment tables (Appendix 6) show what mitigation could be used to deal with these uncertainties. For example:

Mitigation proposed in IIA	How addressed in Local Plan
Flourishing Society	
<ul style="list-style-type: none"> Inclusiveness in play facilities and areas should be promoted 	<ul style="list-style-type: none"> Incorporated into Proposed Submission version City Plan 2036
<ul style="list-style-type: none"> Greater emphasis on waste minimisation and on-site waste management would mitigate impacts of hotels, night-time economy, temporary markets and meanwhile uses. 	<ul style="list-style-type: none"> Dealt with elsewhere in the Proposed Submission Plan, albeit no specific reference to these uses. Policies CV3 and CV4 have been amended to include reference to waste impacts
<ul style="list-style-type: none"> Introduce consistency of approach on over concentration of student housing, hotels and short lets. 	<ul style="list-style-type: none"> Reference to over concentration of student housing, hotels and short lets has been removed since it is not possible to clearly define.
Thriving Economy	

<ul style="list-style-type: none"> • Designs of new office and retail development will be key to their sustainability 	<ul style="list-style-type: none"> • Incorporated into Proposed Submission version City Plan 2036
<ul style="list-style-type: none"> • Policy needs to define what types of “meanwhile uses” would be acceptable 	<ul style="list-style-type: none"> • Proposed mitigation considered to be too prescriptive because the acceptability of different meanwhile uses will vary according to site conditions and location Meanwhile uses will be considered a site by site basis..
Outstanding Environments	
<ul style="list-style-type: none"> • A clear monitoring framework will be needed to identify any adverse impacts of transport consolidation centres as early as possible 	<ul style="list-style-type: none"> • The proposed monitoring framework includes Transport Strategy indicators linked to the impacts of consolidation centres
<ul style="list-style-type: none"> • Greater emphasis on greening and climate resilience within the healthy streets policy would be appropriate. 	<ul style="list-style-type: none"> • This issue is dealt with comprehensively elsewhere in the Proposed Submission City Plan 2036 so has not been repeated in this policy.
<ul style="list-style-type: none"> • Open spaces and green infrastructure policy should emphasise range of open spaces e.g. historic parks and gardens, civic spaces and green/blue roofs 	<ul style="list-style-type: none"> • Incorporated into Proposed Submission version City Plan 2036
<ul style="list-style-type: none"> • Reference should be made to other historic assets not just archaeology in flood risk & SuDS policy 	<ul style="list-style-type: none"> • Incorporated into Proposed Submission version City Plan 2036
<ul style="list-style-type: none"> • Safeguards should be included to ensure that on-site waste treatment facilities do not cause disturbance to neighbouring uses 	<ul style="list-style-type: none"> • New paragraph 6.8.35 has been added to avoid adverse local impacts
Key Areas of Change	
<ul style="list-style-type: none"> • Uncertainties in the Key Areas of Change policies are typically mitigated by policies in other parts of the plan. 	<ul style="list-style-type: none"> • No further mitigation required.
<ul style="list-style-type: none"> • Identification of heritage assets in the Thames Policy Area is recommended 	<ul style="list-style-type: none"> • Key buildings are incorporated into the Thames Policy Area KAOC diagram and Figure 17 shows designated heritage assets in the City.

The IIA is an assessment tool and there may be reasons why mitigation is not incorporated into the Plan in precisely the way recommended in the IIA, for instance because relevant safeguards are deemed to be found elsewhere in the Plan.

8) Reasons for selecting alternatives, assessment method and difficulties encountered

In developing the City Plan 2036, a series of options (reasonable alternatives) for achieving these objectives were considered. These options were developed taking account of emerging evidence and government direction, other relevant plans and programmes and stakeholder engagement. The options cover the main issues that the City will face between now and 2036 and take account of:

- Changes needed to be in conformity with the London Plan
- Changes needed to be consistent with Government policy
- Changes which may improve implementation of our policies
- Situations that have changed since the Local Plan was adopted
- Informal stakeholder engagement

Some additional options emerged as the City Plan 2036 evolved either through new evidence, regional requirements or consultation responses. One of the main difficulties encountered is the uncertainty surrounding the UK's decision to leave the EU and the consequences of its departure in January 2020. Another difficulty is the uncertainty created by ongoing changes to the strategic planning context, including changes to national planning policy and guidance and the review of the London Plan.

The objectives of the City Plan 2036 could be achieved through different policy options in some cases. Reasonable alternatives were evaluated for protection of offices, balance of land uses between commercial, housing retail hotels and other uses, infrastructure and security, river related uses and river transport, hotels and business accommodation, historic environment, tall buildings and views protection, energy & CO₂ emissions, air quality, transport, waste, flood risk, open spaces, retail, housing numbers, location and tenure, social and community infrastructure.

The outcome of this assessment was used to identify the preferred options to take forward into policy for the draft City Plan 2036. Reasons for choosing the preferred option and rejecting other options have been included in this report (Section 5.5).

9) Monitoring

A draft monitoring framework has been developed to monitor the significant effects of implementing the City Plan 2036. This will ensure that where uncertainties exist any unintended adverse effects are picked up quickly. The monitoring framework will be finalised on adoption of the City Plan 2036.

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Committee(s)	Dated:
Planning and Transportation Committee – For decision Port Health and Environmental Services – For information	31 March 2020 19 May 2020
Subject: Advertising ‘A’ Boards Policy	Public
Report of: Director of the Built Environment	For Decision
Report author: Thomas Parker – Department of the Built Environment	

Summary

The City of London Transport Strategy commits to keeping streets clear of obstructions including by not permitting A-Boards to improve accessibility and inclusivity for all users of City streets. This report takes forward detailed implementation.

The report outlines our background strategic and policy position for taking forward Proposal 17 in respect of A-Boards. The report reviews our existing approach to managing A boards and other potential opportunities, including a review of Transport for London’s Operation Clearway.

These approaches are considered unsuitable for improving accessibility City streets as they do not provide a solid or clear enforcement base or mandate. Non-permittance of A-Boards provides a clear and consistent approach to supporting the ambitions of both the Corporate Plan and Transport Strategy.

The report concludes that A-Boards should not be permitted on any public highway in the City. Due to the COVID-19 pandemic, education and enforcement of this policy will not take place until business’ trade has returned to normal, likely a few months after reopening. This date is to be delegated to the Chair and Deputy Chairman of the Committee with the Director of the Built Environment.

Recommendation(s)

Members are asked to:

- Agree to option C that A-Boards should not be permitted on public highway in the City.
- Agree to delegate the decision to begin implementing the education and enforcement plan to the Director of the Built Environment in discussion with the Chair and Deputy Chairman of the Planning and Transportation Committee.

Main Report

Introduction

1. The City of London's 25-year Transport Strategy aims to ensure that the Square Mile is a healthy, attractive and easy place to live, work learn and visit.
2. It is imperative that this vision for City streets is achieved inclusively, ensuring that everybody can travel easily, comfortably and confidently to and around the Square Mile.
3. Proposal 17 commits the City Corporation to keep pavements and streets free of obstructions. This addresses various highway obstructions, from managing outdoor drinking to avoid blocking footways, considered provision of outdoor seating and effective management of dockless cycles. It also includes not permitting A-Boards on the public highway. This report considers the strategy for taking forward the A Board element of Proposal 17. Other elements are also being actively considered and addressed.
4. The Transport Strategy was widely consulted on prior to adoption through an extensive programme of stakeholder engagement. Proposal 17 received 1960 responses with an average support level of 4/5, indicating strong support. Only 26 comments opposed not permitting A boards.
5. Many groups representing people with mobility impairments have called for A-Boards to be banned, including the Royal National Institute of Blind People (RNIB) and Transport for All, who have stated that;

"A-Boards pose significant issues for both wheelchair users, those with mobility impairments and visually impaired people. They physically block the walkways, forcing disabled people either into the road or funnelled into the path of others. We need clear, accessible walkways that don't force conflict with overcrowding."

Duty as a highway authority

6. The City is the Local Highway Authority for most City streets and as such also has an obligation to ensure compliance with the Highways Act 1980. The relevant sections of this Act are:
 - a) Section 137 - if a person, without lawful authority or excuse, in any way wilfully obstructs the free passage along a highway it is an offence and liable to a fine on Level 3 of the Standard Scale (currently up to £1,000.00).

- b) Section 148(c) - if, without lawful authority or excuse a person deposits anything whatsoever on a highway to the interruption of any user of the highway he is guilty of an offence and liable to a fine (again, Level 3 on the Standard Scale).
- c) Section 149 – if anything is so deposited on a highway as to constitute a nuisance, the highway authority for the highway may by notice require the person who deposited it there to remove it forthwith. In the event of non-compliance, a court order may be obtained authorising the removal and disposal of the offending item. In the event that the highway authority considers the item to constitute a danger to users of the highway it can remove the item forthwith and, ultimately, seek a court order for its disposal.
- d) Section 149 (3) of the Act allows a Local Authority to recover its 'expenses' incurred in removal, but not for storage. A charge of £40 for removal of item if owners come forward to claim it may be levied. This charge is to be treated as a measure of deterrence rather than securing an income from this service.
- e) Section 130 – the highway authority has a duty to assert and protect the rights of the public to use and enjoyment of the highway.

2014 policy

- 7. In July 2014, a paper was brought forward to the Planning and Transportation Committee to formalise the City Corporation's position on A-Boards. Before this policy position was adopted, the City Corporation did not have a rigid position on A-Boards and took a neutral view, taking each case on its merits.
- 8. The recommendation agreed by members was that A-Boards on footpaths less than 2m wide will normally be regarded as giving rise to a highway obstruction and removal should be secured, with persistent offenders risking prosecution. On footpaths over 2m wide, an assessment would be made on a case by case basis as to whether A-Boards caused an obstruction.
- 9. Since this policy was adopted in 2014 the City has continued to grow, with over a half a million people working in the City and over 90% of journeys involving walking. New high-density developments have become occupied, with more being built.
- 10. In the context of both this and the Transport Strategy's objective of ensuring the Square Mile is accessible to all, it is considered that the 2014 policy should be reviewed to take account of changed circumstances and increased pedestrian footfall.

Alternative approaches

Transport for London (TfL) – Operation Clearway

11. Since 2016, TfL have had a programme to deal with unauthorised obstructions on the public highway called Operation Clearway. This programme uses engagement, education and enforcement tactics to reduce unauthorised obstructions on the public highway.
12. Operation Clearway uses Revenue Protection Inspectors and Roads and Transport Enforcement Officers. They are dispatched to priority areas on the Transport for London Road Network (TLRN) to engage with businesses to improve compliance with the Highway legislation as well as gathering evidence for enforcement activity, whether that be formal warning, Fixed Penalty Notices (FPNs) or prosecution, where this is required.
13. While not a zero-tolerance policy across all TfL streets, this robust and proactive method more formally resources and targets highway obstructions beyond the existing policy provision of the City Corporation. The approach has achieved over 80% compliance with businesses engaged in the campaign.
14. Operation Clearway fits within the remit of the existing policy but with dedicated, targeted and well-resourced enforcement.

Hybrid Approach

15. Another approach to managing A-Boards could be a hybrid system which slightly modifies the 2014 Policy and considers the nature and use of the street in considering the acceptability of A-Boards.
16. On footways less than 3m wide, A-Boards would be regarded as an obstruction and not permitted.
17. On footways greater than 3m wide, whether A Boards were considered acceptable would depend on the volume of people using the footways.
18. This option is not recommended. Pedestrian comfort levels are an indexed score used to assess footway crowding. The Transport Strategy commits to achieving a B+ pedestrian comfort level across the whole of the Square Mile. It is considered that to permit A-Boards on highways more than 3m wide would compromise the achievement of a B+ comfort level. Many wider footways are on busier routes which routinely have very high footfall. Items placed on the footway would be likely to restrict free flow of pedestrians, increase the incidence of conflicts between pedestrians and risk diversion of pedestrians into the carriageway where the risk of conflict with vehicles (including bicycles) would arise.

London Borough of Hackney

19. The London Borough of Hackney have gone further and in March 2013 resolved that no A-Boards would be allowed on public highway in Hackney (although they would be allowed on private land subject to planning requirements on advertising).
20. This position is supported by an information and enforcement programme. This consists of educating businesses who use A-Boards on the issues they can cause, before progressing to formally writing to the business before resorting to fixed penalty notices and confiscation.
21. We have engaged with Hackney to review the effectiveness of their policy. While unable to provide exact figures, their enforcement director has informed us that almost all businesses remove their A-Boards after discussions with enforcement officers and formal enforcement is rarely required.

New policy options

22. There are three potential options for our A-Board policy
 - a) Do nothing: Retain the 2014 Policy without amendment
 - b) Amend the 2014 Policy: The amendments would adopt the Hybrid Approach set out at paragraphs 15 - 17
 - c) Resolve not to permit A boards on the public highway in the City

Evaluation

23. The Transport Strategy acknowledges the importance of facilitating movement of people by ensuring walking is convenient, safe and inclusive. It also recognises the need for the City's fixed amount of street space to accommodate past (and future) growth. At the same time, businesses sometimes wish to use A Boards, especially if competing premises have A Boards or if the premises are in less conspicuous locations. These competing interests must be weighed in considering the appropriate option.
24. Regard must also be had to the Equalities Impacts outlined below. It is considered that given the particularly intensive use of the City's highways, A Boards are likely to impede free access over footways for pedestrians, with potential adverse impacts as outlined in paragraph 18 above.
25. Options (a) and (b) are not recommended, and Option (c) is proposed. It is considered that any adverse impacts for businesses will be mitigated by providing

a consistent approach so that no one businesses can secure a competitive advantage through the use of A-Boards, and by communicating with businesses about alternatives to A-Boards.

26. The ban will include City Corporation A-Boards but not extend to road signs or other statutory signage related to highways use.

Legal implications

27. The courts have held that some encroachments are so minor as to fall outside the ambit of criminal sanction (the “de minimis” rule). However, this rule is limited to encroachments that are “fractional” or “trifling”¹. Due to the large volumes of people who use the City’s footways at peak times, it is unlikely that an obstruction could be considered as de minimis.

28. All other legal implications are in the body of the report.

Next steps

29. Should members approve the recommendation, officers will agree an education and publicity programme with impacted teams ahead of implementing the new policy. Where A-Boards remain in place after the education and publicity campaign, officers will visit non-compliant premises and request removal. If non-compliance persists, business owners will be written to, after which, where removal powers are available, remaining A-Boards will be removed.
30. This education and enforcement programme will be managed by the Cleansing team and developed with the input of City Transportation.
31. A monitoring strategy will also be put in place to report on the number of A boards removed by occupiers or by enforcement. This is likely to include annual reporting to Members.

Strategic Implications

32. Approval of Option C supports the delivery of Corporate Plan High Level Action 9d – Improve the experience of arriving in and moving through our spaces.
33. The adverse impacts of A-Boards on pedestrian flows, pedestrian comfort and safety particularly affect blind or partially sighted people, including long cane users, and people who may require wider footway widths such as people using wheelchairs or buggies. This supports the deliverables of the Transport Strategy.

¹ Eg Torbay Borough Council v Cross QBD 1995

Conclusion

34. Officers recommend Option C - not permitting A-Boards on the public highway in the City - with the aim of reducing obstructions on the highway and to help provide an attractive, safe and inclusive walking environment.
35. Additionally, officers recommend that, due to the COVID-19 pandemic, Members agree to delegate the decision to begin implementing the education and enforcement plan to the Director of the Built Environment in discussion with the Chair and Deputy Chairman of the Planning and Transportation Committee.
36. The education and enforcement programme will not begin until trade at City businesses have not only reopened but trading has returned to normal. This likely to be a few months after reopening.

Background Papers

Advertising ('A') Boards in the City of London – July 2014

City of London Transport Strategy – May 2019

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Senior Strategic Transportation Officer

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Committee(s): Audit and Risk Management Committee	Date(s): 3 April 2020
Subject: Report of Action Taken	Public
Report of: The Town Clerk & Chief Executive	For Information
Report author: Chloe Rew, Committee & Members Services Officer	

Summary:

This report provides details of the decision taken under urgency procedures since your last meeting.

Recommendation(s)

Members are asked to note the report.

Main Report

1. On 31 March 2020, the Audit and Risk Management Committee was conducted informally via videoconference due to restrictions on travel and association in light of the COVID-19 pandemic.
2. As no Members would be able to be present physically, the formal meeting was cancelled in advance, and arrangements were made to hold an informal meeting via videoconference, to discuss any matters that required decision.
3. Members were given the opportunity to discuss reports on the agenda via video/teleconference, as well as via email, with a view to facilitate Member oversight and scrutiny to inform any requisite decisions being taken under urgency procedures following the meeting.
4. Comments made in the informal videoconference meeting were noted and shared with the Town Clerk as part of the urgency process.
5. In the absence of a formal meeting, and with the expectation that there would be no quorate formal meeting in the coming period due to the ongoing COVID-19 crisis, the following items were agreed under urgency procedures by the Town Clerk, in consultation with the Chairman and Deputy Chairmen.
 - i. **Annual Governance Statement Methodology**
 - consider and approve the methodology set out in the accompanying report for the production and presentation of the Annual Governance Statement (AGS) for 2019/20;
 - note that although the accompanying report requested that the draft AGS be agreed in May 2020 under delegated authority, due to amendments which will now be required in light of the COVID-19 situation, the draft AGS will be presented to the Committee in June 2020. At this stage, approval under urgency may be required if COVID-19 measures prevent the Committee from meeting formally.

- ii. **2019/20 External Audit Plan**
 - agree the 2019/20 External Audit Plan presented by BDO, noting that adjustments would be made in response to COVID-19.
- iii. **Internal Audit Charter**
 - Approve the updated City of London Internal Audit Charter 2020 (noting that the accompanying report stated 2019 in error).
- iv. **Corporate Risk Update**
 - endorse the decision of the Summit Group to approve the following risks:
 - CR33 Major Capital Schemes
 - CR34 Covid-19, noting that the 'effects' section of the risk description has since been amended as follows: 'Through the spread of COVID 19 lives are put at risk, critical and other services are affected, information is not properly shared, proper support is not given to our staff and partners and confidence in the City of London Corporation and the City of London is damaged'; and, the risk may be subject to further amendments as the situation evolves.

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Committee(s)	Dated:
Audit and Risk Management Committee	31 March 2020
Subject: Annual Governance Statement – Methodology	Public
Report of: The Town Clerk and the Chamberlain	For Decision
Report author: Hayley Hajduczek, Corporate Strategy and Performance Officer Matt Lock, Head of Audit and Risk Management	

Summary

The City of London Corporation is required to conduct a review at least once a year of the effectiveness of its system of internal control and publish an Annual Governance Statement (AGS) alongside the annual Statement of Accounts.

This report proposes that the production of the AGS for 2019/20 follows the process established in previous years and drafted jointly by officers from the Town Clerk's and Chamberlain's Departments to reflect the need for corporate ownership. As part of this process, officers will consider the progress made in implementing the future developments identified in last year's AGS.

The draft AGS will be ready for approval in May 2020, accompanied by a schedule of supporting evidence. Subject to the agreement of this Committee, it will be approved by the Town Clerk and Chief Executive under delegated authority. This is due to the schedule of this Committee, as the next meeting is 2 June and the AGS needs to be agreed by 31 May. If approved, it will be signed by the Chair of the Policy and Resources Committee and the Town Clerk and Chief Executive.

Recommendation(s)

Members are asked to:

1. consider and approve the methodology set out in this report for the production and presentation of the Annual Governance Statement for 2019/20;
2. consider whether any additional areas should be added to the Annual Governance Statement for 2019/20; and,
3. grant delegated authority to the Town Clerk, in consultation with the Chairman and Deputy Chairmen of the Audit and Risk Management Committee, to agree the draft Annual Governance Statement.

Main Report

Background

1. The AGS is required by the Accounts and Audit Regulations 2015 and prepared in accordance with proper practice guidance. It has to be approved each year by an appropriate committee of the authority and signed by the most senior member and the most senior officer. In 2012, the Policy and Resources Committee considered a report on the process for producing the AGS, and approved the practice whereby the AGS is approved by the Audit and Risk Committee and then signed by the Chairman of the Policy and Resources Committee and the Town Clerk and Chief Executive.
2. The AGS is published on the City of London website, and reviewed by an external auditor. The external auditor is required to report if the AGS does not comply with proper practices, or if it is misleading or inconsistent with other information the external auditor is aware of from the audit of the Statement of Accounts. To date the external auditor has been content with the City Corporation's AGS.

Current Position

3. The AGS for 2018/19 was approved by Audit and Risk Committee in May 2019. A supporting schedule of assurances was also presented to your Committee. This report outlines the proposed methodology for the production of the AGS for the financial year 2019/20.

Proposals

Format:

4. It is proposed that the AGS for 2019/20 will follow a similar format to that used in previous years. This includes standard paragraphs in the first two sections: Scope of Responsibility and The Purpose of the Governance Framework. The other sections generally follow a standard structure with a description of the key controls/processes followed by a summary of key developments during the year. The AGS also includes a section on the work of the Audit and Risk Management Committee. An outline of the draft 2019/20 AGS, following this format, is attached at Appendix 1.
5. It is proposed that the draft AGS be presented to this Committee in the same format as last year, i.e. showing all of the additions, amendments and deletions as "tracked changes" from the approved and published 2018/19 statement.

Members are requested to approve these proposals for the production and presentation of the Annual Governance Statement for 2019/20.

Content:

6. The AGS is concerned with corporate controls and governance, rather than being confined to financial issues. To emphasise the need for corporate ownership, the AGS will be produced jointly by officers from the Town Clerk's and Chamberlain's Departments, as in previous years.

7. In producing the statement, officers will review the balance between the standing information on the internal control framework, and changes implemented during 2019/20, taking into consideration the overall length of the statement. The outcomes in respect of the Future Work Programme identified in the 2018/19 AGS (listed in Appendix 1) will be incorporated into the relevant sections.
8. In previous years, Members have made suggestions as to additional items that should be included in the AGS.

Members are requested to consider whether any additional areas should be added to the AGS for 2019/20.

Timetable:

9. In recognition of the importance of the AGS as a corporate document, CIPFA states that it is essential that there is buy in at the top level of the authority. It is therefore proposed to present the draft AGS as follows:
 - April 22: Summit Group (Town Clerk and Chief Executive's Senior Leadership Team).
 - During May: by circulation to Members of the Audit and Risk Management Committee. The AGS will need to be approved by delegated authority as the next meeting of this committee is 2 June.
 - May 31: City Fund Statement of Accounts due for publication.

Supporting Evidence:

10. It is proposed that an updated supporting schedule of assurances is presented to Members with the draft AGS, in the same format as that used in 2018/19. This demonstrates the wide range of on-going assurance provided to Members generally during the period covered by the AGS. In particular, this is designed to give assurance to Members of the Audit and Risk Management Committee regarding governance issues that fall within the remit of other Boards or Committees.

Delivering Good Governance in Local Government

11. Following consultation in 2015, CIPFA and Solace introduced a new governance framework for local government in 2016. The framework requires bodies with local authority responsibilities to produce an AGS, published with the annual accounts, to report publicly on how they have complied with their governance code and describe any governance issues, including how they will be addressed.
12. The framework states that an AGS should include:
 - an acknowledgement of responsibility for ensuring that there is a sound system of governance (incorporating the system of internal control) and reference to the authority's code of governance;
 - reference to and assessment of the effectiveness of key elements of the governance framework and the role of those responsible for the development and maintenance of the governance environment, such as the authority, the executive, the audit committee, internal audit and others as appropriate;

- an opinion on the level of assurance that the governance arrangements can provide and that the arrangements continue to be regarded as fit for purpose in accordance with the governance framework;
- an agreed action plan showing actions taken, or proposed, to deal with significant governance issues;
- reference to how issues raised in the previous year's AGS have been resolved, and
- a conclusion – a commitment to monitoring implementation as part of the next annual review.

13. The framework also states that the AGS should be signed by the leading member (or equivalent) and chief executive (or equivalent) on behalf of the authority, and should be approved at a meeting of the authority or delegated committee. Local authorities are required to include the AGS with their statement of accounts. To that end the AGS will need to go through under delegated authority as the next meeting of the committee is 2 June and the AGS needs to be agreed before 31 May.

Approach for Subsequent Years

14. With a change in personnel in both the Corporate Strategy and Performance Team and Internal Audit brings a fresh perspective to the approach for preparing the AGS. Having reviewed the guidance, it is not considered necessary to wait until after 31 March each year to prepare the AGS. Consequently, it is proposed that, for future years, the AGS is prepared for the final (March) Audit and Risk Management Committee of each financial year. A holding paper setting out the methodology for preparing the AGS would no longer be necessary.

Security implications

15. There are no specific security implications arising from the contents of this report.

Financial implications

16. There are no specific financial implications arising from the contents of this report.

Public sector equality duty

17. There are no specific equalities implications arising from the contents of this report.

Resourcing implications

18. There are no specific resourcing implications arising from the contents of this report.

Conclusion

19. Members are asked to approve the production of the AGS for 2019/20 following the process established in previous years, and to consider any additional areas to be added to the AGS this year. Members are also asked to grant delegated

authority to the Town Clerk in consultation with the Chairman and Deputy Chairmen of the Audit and Risk Management Committee, to agree the draft Annual Governance Statement. This is required as next meeting of the committee is 2 June and the AGS needs to be agreed before 31 May.

Appendices

- Appendix 1 – Outline Annual Governance Statement 2019/20

Background Papers

- CIPFA/SOLACE - Delivering good governance in Local Government:
 - Framework (2016 Edition)
 - Guidance Note for English Authorities (2016 Edition)

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ANNUAL GOVERNANCE STATEMENT 2019/20: OUTLINE

Scope of Responsibility

1. The City of London Corporation is the governing body of the Square Mile dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK. It aims to contribute to a flourishing society, support a thriving economy and support outstanding environments by strengthening the character, capacity and connections of the City, London and the UK for the benefit of people who live, learn, work and visit here. Its unique franchise arrangements support the achievement of these aims.
2. Although this statement has been prepared to reflect the City of London Corporation (“the City Corporation”) in its capacity as a local authority and police authority, the governance arrangements are applied equally to its other funds – City’s Cash and Bridge House Estates.
3. The City Corporation is responsible for ensuring that its business is conducted in accordance with the law and proper standards of governance; that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively; and that arrangements are made to secure continuous improvement in the way its functions are operated.
4. In discharging this overall responsibility, the City Corporation is responsible for putting in place proper arrangements for the governance of its affairs and facilitating the effective exercise of its functions, which includes arrangements for the management of risk.
5. The City Corporation has approved and adopted a code of corporate governance which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code is on the City Corporation’s website at www.cityoflondon.gov.uk. This statement explains how the City Corporation has complied with the code and also meets the requirements of regulation 6(1) of the Accounts and Audit (England) Regulations 2015, which requires all relevant bodies to prepare an annual governance statement.

The Purpose of the Governance Framework

6. The governance framework comprises the systems and processes by which the City Corporation is directed and controlled and its activities through which it accounts to, engages with and leads its communities. It enables the City Corporation to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
7. The system of internal control is a significant part of that framework and is designed to manage all risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable rather than absolute assurance of effectiveness. The City Corporation’s system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of its policies, aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
8. The governance framework has been in place at the City for the year ended 31st March 2020 and up to the date of approval of the statement of accounts.

Key Elements of the Governance Framework

Code of Corporate Governance

Standards Committee

Electoral arrangements

Business Strategy and Planning Process

Information Management Strategy

Financial Management Arrangements

[Risk Management](#)
[Health & Safety and Wellbeing](#)
[Business Continuity](#)
[Role of Internal Audit](#)
[Performance Management](#)
[Audit and Risk Management Committee](#)

Review of Effectiveness

Head of Internal Audit's Opinion

Future Work Programme

NB: The following items constitute the Future Work Programme from the 2018/19 Annual Governance Statement (see paragraph 7 of the covering report):

- Review the City Corporation's governance arrangements against the requirements of the CIPFA/Solace framework *Delivering Good Governance in Local Government 2016* and, subject to agreement, following the fundamental review.
- Begin collecting data against a set of outcome-based measures for the whole City Corporation, that demonstrate impact and progress towards delivering the Corporate Plan 2018-23.
- Undertake an annual update for the registration and publication of declarations of interest by the City Corporation's Members and Co-opted Members.
- Provide training events and briefing sessions for Members as part of the Member Development Programme to ensure that they are aware of current and emerging issues, how the City Corporation is delivering its services and responding to changing priorities; and the role of decision-makers. Forthcoming sessions will focus on Cyber-Security, Charing skills and Rough Sleeping & Homelessness.
- Deliver the benefits from the programme of cross-cutting efficiency and effectiveness reviews resulting from the fundamental review and the 2% budget efficiency target.
- Deliver the priority outcomes from the updated and refreshed IM Strategy:
 - Business Intelligence infrastructure, new reports and analytics developed across the organisation.
 - Communication and training on using IM for new ways of working across the organisation.
 - Implement good IM practices including protective marking and classification.
- Implement the new risk appetite framework for the City Corporation, which reflects its capacity to manage risk and willingness to take risk in order to meet the strategic objectives.
- Review the City Corporation's risk management strategy and corporate risk register.
- Review programme governance arrangements, to improve the handling of corporate and departmental projects, including reviewing the terms of reference of relevant governance groups and a process for escalating risks to the appropriate levels.
- Investigate ISO22301 accreditation for our business continuity services.
- Deliver the extended remit of the Audit & Risk Management Committee to undertake periodic reviews of the risk management procedures, financial capabilities, controls, and safeguarding procedures of the City of London School, the City of London School for Girls, the City of London Freeman's School, the City of London Academies Trust (including its embedded academies) and the City Academies that are free-standing entities.

This annual governance statement was approved by the Town Clerk and Chief Executive under delegated authority from by the City Corporation's Audit and Risk Management Committee on xxxxxxxx.

John Barradell
Town Clerk and Chief Executive
Date:

Catherine McGuinness
Chair, Policy and Resources Committee
Date:

Report to the Audit and Risk Management Committee

CITY OF LONDON CORPORATION

Audit Planning Report for the year ending 31 March 2020

IDEAS | PEOPLE | TRUST



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WELCOME

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We have pleasure in presenting our Audit Planning Report to the Audit and Risk Management Committee of the City of London Corporation (the 'Corporation'). This report forms a key part of our communication strategy with you, a strategy which is designed to promote effective two way communication throughout the audit process with those charged with governance.

In communicating with the Corporation, we consider those charged with governance of the other entities within the scope of this report to be informed about matters relevant to their charity, company or fund. Please let us know if this is not appropriate.

It summarises the planned audit strategy for the year ending 31 March 2020 in respect of our audit of the financial statements of the City Fund, Pension Fund, Bridge House Estates, City's Cash, Guildhall School of Music and Drama, City's Cash Trusts, other Sundry Trusts and the Lord Mayor's Show; and our review of the arrangements in place for the use of resources of the City Fund. It comprises our proposed materiality levels, key audit risks and the planned approach to these, together with timetable and the BDO teams.

The planned audit strategy has been discussed with management to ensure that it incorporates developments in the business during the year under review, the results for the year to date and other required scope changes.

This report contains matters which should properly be considered by the Court of Common Council. We expect that the Audit and Risk Management Committee will refer such matters to the Court, together with any recommendations, as it considers appropriate.

We look forward to discussing this plan with you at the Audit and Risk Management Committee meeting on 31 March 2020 and to receiving your input on the scope and approach.

In the meantime if you would like to discuss any aspects in advance of the meeting please contact one of the team.

Leigh Lloyd-Thomas



17 March 2020

Fiona Condon



This report has been prepared solely for the use of the Audit and Risk Management Committee and Those Charged with Governance and should not be shown to any other person without our express permission in writing. In preparing this report we do not accept or assume responsibility for any other purpose or to any other person. For more information on our respective responsibilities please see the appendices.



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This summary provides an overview of the significant audit matters that we believe are important to the Audit and Risk Management Committee in reviewing the planned audit strategy for the Corporation for the year ending 31 March 2020.

It is also intended to promote effective communication and discussion and to ensure that the audit strategy appropriately incorporates input from those charged with governance.

Audit scope

Our approach is designed to ensure we obtain the requisite level of assurance in accordance with applicable laws, appropriate standards and other guidance issued by the NAO and Charity Commission.

City Fund

The scope of the City Fund audit, in exercising the Corporation's functions as a local authority, is determined by the NAO's Code of Audit Practice that sets out what local auditors are required to do to fulfil their statutory responsibilities under the Local Audit and Accountability Act 2014.

This includes: auditing the financial statements included in the Statement of Accounts; reviewing the arrangements to secure value for money through the economic, efficient and effective use of its resources; and, where appropriate, exercising the auditor's wider reporting powers and duties.

Pension Fund

The scope of the pension fund audit, as the administering authority providing the local government pension scheme for the Corporation and other scheduled and admitted bodies, is also determined by the NAO's Code of Audit Practice and the Local Audit and Accountability Act 2014.

This includes: auditing the financial statements included in the Statement of Accounts, and reviewing the pension fund annual report to check the consistency of the pension fund financial statements within the annual report with the pension fund financial statements in the Statement of Accounts.

Bridge House Estates

Bridge House Estates is an unincorporated charity registered with the Charity Commission. The principal objective of Bridge House Estates is to maintain Tower Bridge, London Bridge, Southwark Bridge, Blackfriars Bridge and the Millennium Bridge. It may also use surplus funds to support other charitable activities across London.

The Corporation, as the Corporate Trustee, is responsible for preparing and filing an annual report and financial statements which show a true and fair view and are prepared in accordance with FRS 102 and the Charities SORP.

The Corporation has delegated responsibility in respect of management of this charity to various committees of the Common Council.

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City's Cash and Sundry Trusts

City's Cash is a fund of the Corporation that can be traced back to the 15th Century and has built up from a combination of properties, land, bequests and transfers under statute since that time. Investments in properties, stocks and shares are managed to provide a total return that supports the provision of services that are of importance nationally and internationally as well as to the City and Greater London.

There is no legislation that governs the reporting requirements for City's Cash and the Corporation has elected to prepare the financial statements in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102).

The Sundry Trusts are unincorporated charities whose financial statements are prepared in accordance with FRS 102 and the Charities SORP.

Guildhall School of Music and Drama (GSM&D)

Guildhall School of Music & Drama is a designated Higher Education (HE) institution and as such is required to produce a set of financial accounts for the year ended 31 July. The School is part of the City of London Corporation (not a separate legal entity) and as such is not required to produce full statutory accounts. The Income and Expenditure Account is prepared following the general format of the Further and Higher Education SORP. An independent accountant's report is required to cover "regularity" (use of OfS funds) and compliance with the Terms and Conditions of Funding for HEIs.

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Materiality

As the main funds of the Corporation have custody of significant public assets through the ownership of property assets and managed investments that are used to generate income to support each fund, overall financial statements planning materiality has been determined by reference to a benchmark using Statement of Financial Position / Net Assets Statement for relevant assets.

We also consider that a misstatement at a lower level through income and expenditure would be material where this may impact on available resources to support each fund, or where significant transactions or classes of transaction would be important in understanding the financial performance. Therefore, we will apply a lower level of specific materiality to income and expenditure transactions in the performance statement / statement of financial activity for each of the main funds. Planning materiality has been based on balances and transactions disclosed in the prior year financial statements. Materiality will be revisited when the draft financial statements are received for audit.

The basis for setting materiality for the sundry trusts, is expenditure for all Trusts whose deficits are funded by City of London Corporation and gross assets for all other Trusts / entities. A lower specific materiality has been set for those entities whose items of income and expenditure are significantly lower than the asset base. Specific materiality is applied to those areas of the financial statements where a misstatement would normally affect net income before investment gains and losses.

Although materiality is the judgement of the engagement lead, the Audit and Risk Management Committee is obliged to satisfy themselves that the materiality chosen is appropriate for the scope of the audit.

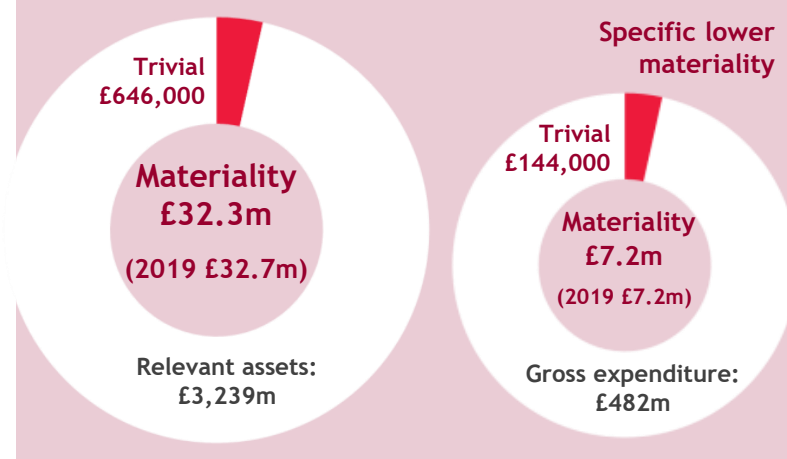
City Fund

We have applied a benchmark total comprising the combined value of long term assets and managed investments as a suitable value for materiality. Materiality has been set at 1% of this Balance Sheet amount.

We consider that a misstatement at a lower level through revenue expenditure would be material where this may impact on setting future council tax or HRA rent levels. Revenue reserves and resources available to the City Fund at 31 March 2019 was £126m, comprising the General Fund balance £44m, Housing Revenue Account balance £4m and earmarked reserves £78m. We will therefore apply a lower specific level of materiality at 1.5% of gross expenditure to income and expenditure transactions in the Comprehensive Income and Expenditure statement (CIES) and Movement in reserves statement (MiRS) that impact on revenue resources to reduce the risk of material misstatements.

The clearly trivial amount is based on 2% of the materiality level.

Financial statements materiality



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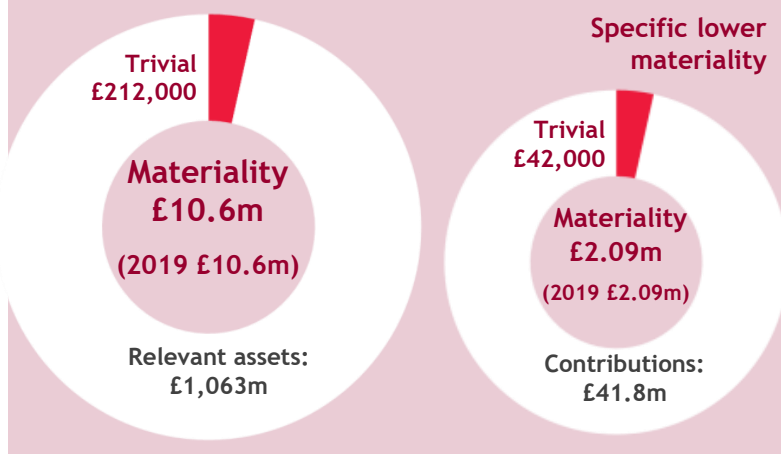
Pension Fund

We have applied a benchmark total comprising the gross value of investment assets as a suitable value for materiality. Materiality has been set at 1% of this Net Asset Statement amount.

Specific materiality for the Fund Account, for income and expenditure classes of transactions, has been set at 5% of contributions receivable.

The clearly trivial amount is based on 2% of the materiality level.

Financial statements materiality

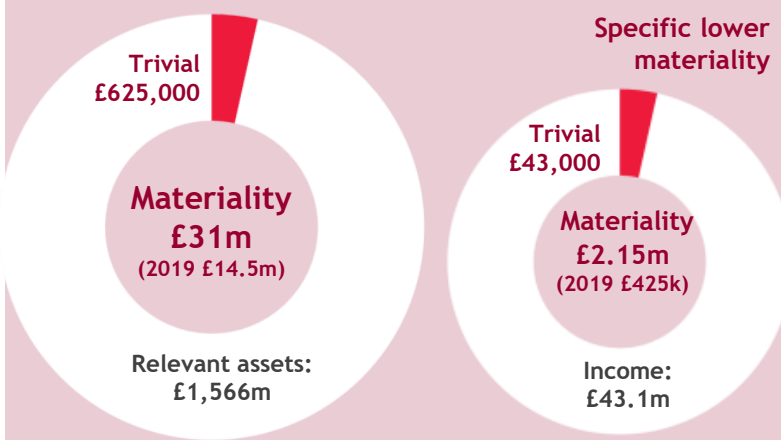


Bridge House Estates

We have applied a benchmark comprising the gross assets of the charity as a suitable basis for materiality. Given the relative significance of the assets held by Bridge House Estates materiality has been set at 2% of gross assets.

Specific materiality for non-investment related items in the Statement of Financial Activities has been set at 5% of total income. As noted on page 6, materiality is the judgement of the audit partner and takes into account a number of facts including risk of misstatement, users' interests and areas of the financial statements which are a focus for those users. As is permissible under BDO methodology, financial statement materiality has increased from the prior year. In determining an appropriate level of specific materiality for areas of income and expenditure, we have determined a level which ensures there is consistency with prior year in terms of the material areas of testing and lower sample sizes for residual balances. The scope of our work will continue to ensure that individual items above trivial are reported to the Committee. The clearly trivial amount is based on 2% of the materiality level.

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City's Cash (and Sundry Trusts)

With respect to City's Cash, We have applied a benchmark comprising the gross assets of the charity as a suitable basis for materiality. Given the relative significance of the assets held by City Cash, materiality has been set at 2% of gross assets.

Specific materiality for non-investment related items in the Statement of Financial Activities has been set at 5% of total income. As noted on page 6, materiality is the judgement of the audit partner and takes into account a number of facts including risk of misstatement, users' interests and areas of the financial statements which are a focus for those users. As is permissible under BDO methodology, financial statement materiality has increased from the prior year. In determining an appropriate level of specific materiality for areas of income and expenditure, we have determined a level which ensures there is consistency with prior year in terms of the material areas of testing and lower sample sizes for residual balances. The scope of our work will continue to ensure that individual items above trivial are reported to the Committee.

The materiality levels for the Sundry Trusts are based on 2% of gross assets, where appropriate a specific materiality has been set at 5% of expenditure for those entities whose deficits are funded by City of London Corporation. Further details are included in the appendices.

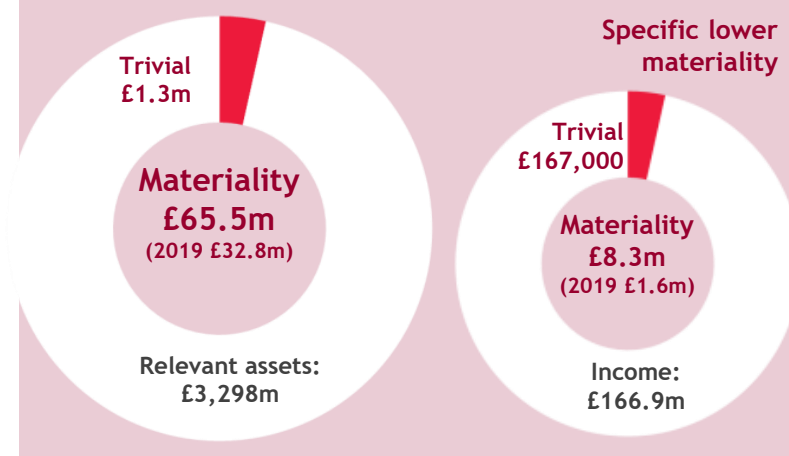
The clearly trivial amount is based on 2% of the materiality level.

Guildhall School of Music and Drama

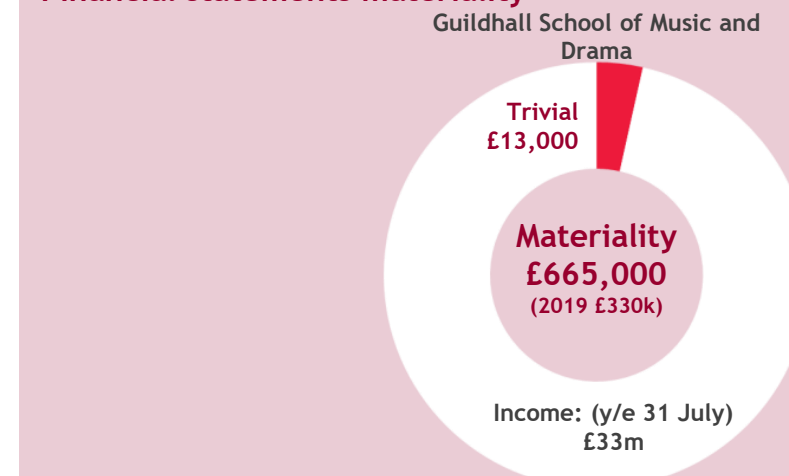
We have applied a benchmark comprising the total income of the School as a suitable value for materiality. Materiality has been set at 2% of total income in line with BDO methodology taking into account that this is the first audit.

The clearly trivial amount is based on 2% of the materiality level.

Financial statements materiality



Financial statements materiality



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Our Audit Strategy is predicated on a risk based approach, so that audit work is focused on the areas of the financial statements where the risk of material misstatement is assessed to be higher, and (for City Fund) where there is a risk that the organisation has not made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

We have discussed the changes to the business, systems and controls in the year with management and obtained their own view of potential audit risks in order to update our understanding of each entity's activities and to determine which risks impact on the numbers and disclosures in the financial statements, or (for City Fund) on its arrangements for securing economy, efficiency and effectiveness in its use of resources.

A lower level of materiality is applied to the areas of the financial statements that are considered to be sensitive, such as senior management remuneration disclosures, auditor's remuneration disclosures and related party disclosures.

We will continue to update this assessment throughout the audit.

The table on the next page summarises our planned approach to audit risks identified.

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Risk identified - Financial statements

■ Significant risk

■ Normal risk

	City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts	GSM&D	Fraud risk present	Testing approach	Impact of significant judgements and estimates
Management override of controls	■	■	■	■	■	■	Yes	Substantive	Medium
Revenue (and expenditure) recognition	■	■	■	■	■	■	Yes	Substantive	Medium
Property, plant & equipment and investment property valuations	■	■	■	■	■	■	No	Substantive	High
Pension liability valuation	■	■	■	■	■	■	No	Substantive	High
NDR appeals provision	■	■	■	■	■	■	No	Substantive	High
Investment valuations	■	■	■	■	■	■	No	Substantive	Medium
Impairment allowance for non-collection of receivables	■	■	■	■	■	■	No	Substantive	Medium
Related party transactions	■	■	■	■	■	■	No	Substantive	Low
Pension contributions	■	■	■	■	■	■	No	Substantive	Low
Pension benefits payable	■	■	■	■	■	■	No	Substantive	Low
Decommissioning Provision	■	■	■	■	■	■	No	Substantive	High

Risk identified - Use of resources

Testing approach

Police financial management	■	Detailed review of savings plans
Sustainable finances	■	Detailed review of MTFS

INDEPENDENCE AND FEES

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Independence

We confirm that the firm complies with the Financial Reporting Council's Ethical Standard for Auditors and, in our professional judgement, is independent and objective within the meaning of those Standards.

Fees	2019/20 £	2018/19 £
Corporation audit fees		
City Fund	⁽¹⁾ 108,000	⁽¹⁾ 128,000
Pension Fund	⁽¹⁾ 22,000	⁽¹⁾ 22,000
City's Cash and Sundry Trusts	⁽²⁾ 146,000	100,000
Bridge House Estates	⁽²⁾ 70,000	40,000
Subsidiaries audit fees		
Barking Power Limited and Thames Power Services Limited	⁽⁴⁾ 24,000	31,500
Total audit fees	370,000	321,000
Non audit fees		
Grants and subsidies certification	31,000	36,000
Report on Guildhall School of Music and Drama financial statements	10,000	8,000
Non audit fees	41,000	44,000
Total fees	411,000	365,000

Fees updates

- (1) This includes additional costs in 2018/19 that were incurred as a result of the increased scope in work as a major local audit and additional work around NDR pooling and SIP income/expenditure and the McCloud impact on pension liabilities (City Fund £48,000 and Pension Fund £7,000). We have reflected the baseline element of these increased in costs in the 2019/20 fees.
- (2) We have rebased the costs for City's Cash and Bridge House Estates and increased fees by £80,000 (offset by a £4,000 reduction for 2 sundry trusts no longer requiring audit) to reflect the size and complexity of the entities as well as the level of resources, including significant input of specialist time.
- (3) This includes additional fees due to the increased scope of the Housing Benefit Assurance Process work, additional reporting requirements and errors found in 2018/19.
- (4) To be discussed and agreed with financial management.

Grants and subsidies certification	2019/20 £	2018/19 £
Housing benefit subsidy	18,000	⁽³⁾ 23,000
Teachers Pensions Return - Sir John Cass Primary School	2,000	2,000
Teachers Pensions Returns (x2)	9,000	9,000
Pooled housing capital receipts	2,000	2,000
Total	31,000	36,000

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OVERVIEW

Key components of our audit objectives and strategy for the Corporation are highlighted and explained on the following pages.

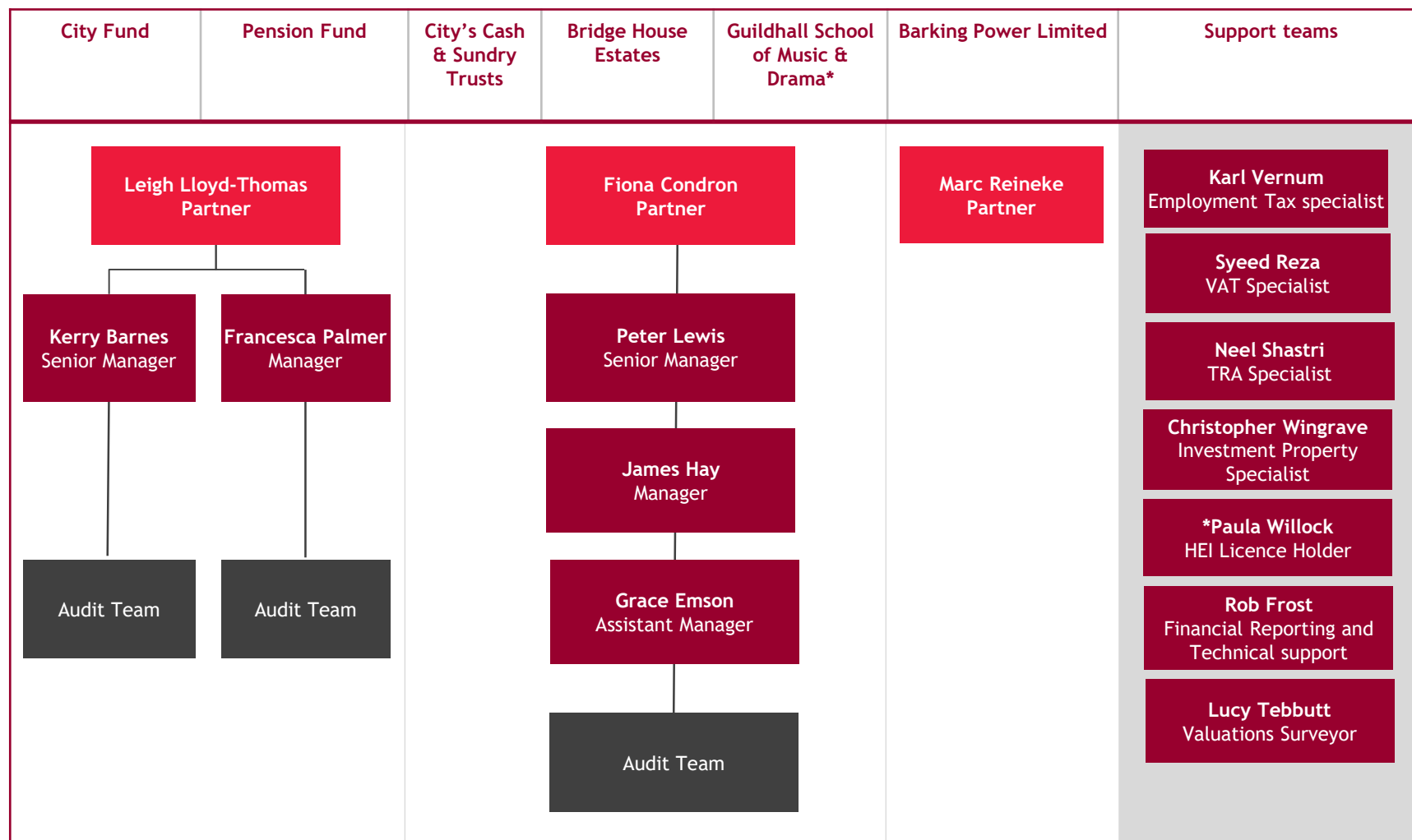
Audit planning is a collaborative and continuous process and our audit strategy, as reflected here, will be reviewed and updated as our audit progresses.

We will communicate any significant changes to our audit strategy, should the need for such change arise.

Reporting	Objectives
Auditing standards	We will perform our audit in accordance with International Standards on Auditing UK (ISAs (UK)) and relevant guidance published by the NAO, Charity Commission and HEFCE.
Financial statements	We will express an opinion on the financial statements for each entity, prepared in accordance with the relevant financial reporting framework. For City Fund and the Pension Fund this is the CIPFA Code of Practice on Local Authority Accounting 2019/20. For City’s Cash this is UK GAAP. For Bridge House Estates and the Sundry Trusts this is UK GAAP, the Charities Act 2011 and the Charities SORP 2015 (2 nd Edition). For Guildhall School of Music and Drama this is the Further and Higher Education SORP 2015.
Statement of Accounts / Annual Reports	<p>In addition to our objectives regarding the financial statements, we will also:</p> <ul style="list-style-type: none">• Read and consider the ‘other information’ contained in the Statement of Accounts / Annual Reports such as the additional narrative reports. We will consider whether there is a material inconsistency between the other information and the financial statements or other information and our knowledge obtained during the audit.• For statutory other information (defined by the Charities SORP) for the charities we will form an opinion on whether the information given in the other information is consistent with the financial statements and our knowledge obtained in the audit and whether the reports have been prepared in accordance with applicable legal requirements.
Use of resources (City Fund)	We will report to the Corporation, in respect of the activities of the City Fund, whether it has put in place proper arrangements for securing economy, efficiency and effectiveness in its use of resources.
WGA (City Fund)	We will review the Whole of Government Accounts (WGA) return for City Fund and express an opinion on the return as to whether it is consistent with the audited financial statements.
Additional powers and duties (City Fund)	Where necessary we may be required to: issue of a report in the public interest; make a written recommendation to the Corporation; allow local electors to raise questions and objections on the accounts; or exercise legal powers to apply to the courts for a declaration that an item of account is contrary to law, issue an advisory notice or an application for a judicial review.
Report to the Audit and Risk Management Committee	Prior to the approval of the financial statements, we will discuss our significant findings of our audit for each fund, charity or entity with the Audit and Risk Management Committee. As noted in the introduction, in communicating with the Corporation, we consider those charged with governance of the other entities within the scope of this report to be informed about matters relevant to their charity, company or fund. We will highlight key accounting and audit issues as well as internal control findings and any other significant matters arising from the audit.

TEAM ORGANISATION

Our structure



BDO TEAM

Team responsibilities - engagement leads



Leigh Lloyd-Thomas
Engagement Lead

t: 020 7893 2616
e: leigh.lloyd-thomas@bdo.co.uk

I will have primary responsibility to ensure that the appropriate audit opinions are given for City Fund and the Pension Fund.

I will ensure that we have undertaken sufficient work to assess the Corporation's arrangements, in respect of the City Fund, for securing economy, efficiency and effectiveness in the use of its resources against the guidance published by the NAO.

I am also responsible for co-ordinating the audit work across the funds and on various grants and certification returns.



Fiona Condrón
Engagement Lead

t: 01293 591 102
e: fiona.condron@bdo.co.uk

I will have primary responsibility to ensure that the appropriate audit opinions are issued for Bridge House Estates, City's Cash and the Sundry Trusts.

Leigh and Fiona will work closely together to ensure that the audits across all the funds and trusts are properly coordinated.

In meeting this responsibility, we ensure that the audit has resulted in obtaining sufficient and appropriate evidence to provide reasonable, but not absolute, assurance that the financial statements are free from material misstatement, whether due to fraud or error, and to report on the financial statements and communicate as required by the ISAs (UK), in accordance with our findings.

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Team responsibilities - audit managers

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Kerry Barnes
Senior Manager

t: 020 7893 3837
e: kerry.l.barnes@bdo.co.uk

I will lead on the audit of the City Fund and on various grants and certification returns.



Francesca Palmer
Audit Manager

t: 01473 320 739
e: francesca.palmer@bdo.co.uk

I will lead on the audit of the Pension Fund.



Peter Lewis
Senior Audit Manager

t: 01293 848969
e: peter.lewis@bdo.co.uk

I will oversee the audit of City's Cash and the Sundry Trusts and Bridge House Estates.



James Hay
Audit Manager

t: 020 7893 2934
e: james.hayl@bdo.co.uk

I will lead on the audit of City's Cash and the Sundry Trusts, Bridge House Estates and Guildhall School of Music and Drama.

The audit managers work closely with Leigh and Fiona to develop and execute the audit strategy for each fund and the trusts. Each manager has been assigned as a key point of contact on a day to day basis for these audits and will ensure that timelines are carefully managed to ensure that deadlines are met and matters to be communicated to management and the Audit and Risk Management Committee are highlighted on a timely basis.

BDO TEAM 3

Team responsibilities - other key team members

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Syeed Reza
VAT Specialist

t: 020 7893 3665
e: syeed.reza@bdo.co.uk

Syeed will provide VAT support to the engagement team and will liaise with management with regards to the VAT audit assist across all entities and funds.



Karl Venum
Employment Tax Specialist

t: 020 7893 3549
e: karl.vernum@bdo.co.uk

Karl will provide employment tax support to the engagement team and will liaise with management with regards to the employment taxes audit assist across all entities and funds.



Neel Shastri
TRA Specialist

t: 020 7893 2328
e: neel.shastri@bdo.co.uk

I will provide IT and data analytics support to the engagement team across all entities and funds.



Christopher Wingrave
Investment Property Specialist

t: 0129 384 8971
e: christopher.wingrace@bdo.co.uk

Chris is a director in Real Estate assurance and his team will provide comparative benchmark data to the audit team to review the valuations and yields used by the valuers for investment property valuations.



Lucy Tebbutt
Valuations Surveyor

t: 020 3860 6451
e: lucy.tebbutt@bdo.co.uk

Lucy is a qualified valuer in the valuations team and will provide assistance to the audit team to review the valuations and yields used by the valuers for investment property valuations.



Paula Willock
HEI Licence Holder

t: 0129 384 8970
e: paula.willock@bdo.co.uk

Paula will provide support to the engagement team with respect to the Guildhall School of Drama and Music. I am an education licence holder and have experience of working with Higher Education Institutions.

OVERVIEW

We have assessed the following as financial statements audit risks. These are matters assessed as most likely to cause a material misstatement in the financial statements and include those that will have the greatest effect on audit strategy, the allocation of audit resources and the amount of audit focus by the engagement team.

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Description of risk	City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts	GSM&D	
■ Significant risk ■ Normal risk							Overview of risk
Management override of controls							Auditing standards presumes that management is in a unique position to perpetrate fraud because of their ability to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively.
Revenue (and expenditure) recognition							Auditing standards presume there is a significant risk of fraud in relation to revenue recognition. For City Fund, there is risk in respect of the existence (recognition) of revenue and capital grants that are subject to performance conditions before these may be recognised as revenue in the comprehensive income and expenditure statement (CIES). There is also a risk around the existence of fees and charges and investment property rental income. For net-spending bodies in the public sector there is also risk of fraud related to recognition of expenditure. For City's Cash and the Sundry Trusts, Bridge House Estates and Guildhall School of Music and Drama there are material revenue streams from a variety of sources: rental income, tourism fees and charges, tuition fees, investments, grants and donations. We consider the risk to be related to the completeness of the amounts recognised in the year and the appropriate identification of any relevant restrictions. For charities, the risks can be identified as affecting the completeness of income, although there are also risks regarding restrictions, accuracy and existence of income.
PPE and Investment property valuation							The Corporation holds an extensive portfolio of land, buildings, dwellings and investment properties. There is a risk over their valuation where valuations are based on assumptions or where updated valuations have not been provided for a class of assets at year-end.
Pension liability valuation							The valuation of the defined benefit obligation is a complex calculation involving a number of significant judgements and assumptions. The accounting estimate for the defined benefit pension liability uses information on current, deferred and retired member data and applies various actuarial assumptions over pension increases, salary increases, mortality, commutation take up and discount rates to calculate the present value of the liabilities. The calculation is complex and inputs can be part of a range of appropriate percentages. The inputs are usually highly sensitive to change and due to the amounts being highly material, a small change in input could result in materially different liabilities.

OVERVIEW 2

Description of risk	City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts	GSM&D	Overview of risk
■ Significant risk ■ Normal risk							
NDR appeals provision	■						There is a risk in relation to the estimation of the provision to repay business rates income due to assumptions used in calculating the likely success rate of appeals.
Investment valuations		■	■	■			There is a risk that investments may not be appropriately valued particularly where the investments are held in private equity or infrastructure pooled funds.
Impairment allowance for receivables	■						There is a risk over the valuation of the impairment allowance for non-collection of receivables and arrears if incorrect assumptions or source data are used.
Related party transactions	■	■	■	■	■		There is a risk that related party disclosures are not complete and accurate. Historically members have provided declarations but the requirements to consider other connected parties (including family and business connections) may not have been explicitly considered.
Pension contributions		■					There is a risk that the Corporation or other admitted and scheduled employers may not be calculating contributions correctly or paying over the full amount due to the pension fund.
Pension benefits payable		■					There is a risk that pension benefits payable may not be correct based on accrued benefits of members or may not be in calculated in accordance with the scheme regulations.
Decommissioning Provision			■				There is a risk that the costs of restructuring will not be calculated on a reasonable basis and not disclosed correctly. The provision has increased by £8.7m in FY19 - there were significant estimates and assumptions built into this, including the contingency costs and contractor risks factored in. There is a risk the definition of a provision under FRS 102 has not been met with regard to these costs, and that estimates and assumptions are incorrect.

MANAGEMENT OVERRIDE OF CONTROLS

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Auditing standards presume that management is in a unique position to perpetrate fraud by overriding controls.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				
Fraud risk				
Assess design & implementation of controls to mitigate				
Significant Management estimates & judgements				
Controls testing approach				
Substantive testing approach				
Risk highlighted by Corporation				

Risk detail

ISA (UK) 240 - The auditor's responsibilities relating to fraud in an audit of financial statements requires us to presume that the risk of management override of controls is present and significant in all entities.

Planned audit approach

Our audit procedures will include the following:

- Consideration of estimates and judgements applied in the financial statements to assess their appropriateness and the existence of any systematic bias;
- Review and checking of high value and unusual journal entries made in the year and agreeing the journals to supporting documentation. We will determine key risk characteristics to filter the population of journals. We will use our IT team to assist with the journal extraction;
- Consideration of unadjusted audit differences for indications of bias or deliberate misstatement; and
- Consideration of areas where management bias could impact remuneration through performance based payment schemes.

REVENUE (AND EXPENDITURE) RECOGNITION

Auditing standards presume that income recognition presents a fraud risk.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				
Fraud risk				
Assess design & implementation of controls to mitigate				
Significant Management estimates & judgements				
Controls testing approach				
Substantive testing approach				
Risk highlighted by Corporation				

Risk detail

Under auditing standards there is a presumption that there is a risk of fraud in revenue recognition.

We have rebutted revenue recognition as a risk for the Pension Fund as revenue is principally monthly payroll contributions from a small number of employers.

For the City Fund, we consider there to be a significant risk in respect of the existence (recognition) of revenue and capital grants that are subject to performance conditions before these may be recognised as revenue in the Comprehensive Income and Expenditure statement (CIES). There is also a risk around the existence of fees and charges and investment property rental income. For net-spending bodies in the public sector there is also risk of fraud related to recognition of expenditure.

For Bridge House Estates, we consider there to be a significant risk in respect of the completeness of investment property income, which accounts for approximately 75% of total income, due to the cut off risk around the year end.

For City's Cash, we consider there to be a significant risk in respect of the completeness of investment property income and education income (including tuition fees, grants, donations and charges for the use of facilities), due to the cut off risk around the year end. Together these account for approximately 89% of total income.

The Sundry Trusts we consider there to be a significant risk in respect of the completeness of grants, donations and legacies, fees and charges (including admissions) and rental income due to the cut off risk around the year end. For grants, donations and legacies we also consider there to be a risk that any relevant restrictions are not correctly identified.

For Guildhall School of Music and Drama, we consider there to be a significant risk in respect of the completeness of academic fees and contracts, funding council grants, research grants and contracts and other operating income (including support from City of London Corporation and residencies, catering and conference income).

Planned audit approach

Our audit procedures will include the following:

- Test a sample of grants included in income to documentation from grant paying bodies and check whether recognition criteria have been met (City Fund);
- Testing material income streams and cut off testing to ensure income is recognised in the correct period and appropriately classified as restricted or unrestricted funds (charity entities only);
- Test a sample of fees and charges to ensure that income has been recorded in the correct period and that all income that should have been recorded has been;
- Test a sample of grants and donations to ensure completeness, accuracy, existence and classification (as restricted or unrestricted) in the financial statements;
- Test a sample of investment income and confirm to third party investment manager reports;
- Test a sample of property rental income and agree to lease agreements and recalculations performed to determine whether the amounts are accurate and recorded in the correct period; and
- Test a sample of expenditure either side of year end, to confirm that expenditure has been recorded in the correct period and that all expenditure that should have been recorded at year end has been (City Fund).

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There is a risk over the valuation of land, buildings, dwellings and investment properties where valuations are based on significant assumptions.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

Land, buildings and dwellings are reported at fair value / carrying value. For City Fund, operational assets are valued at current value and surplus assets / assets held for sale at fair value at the balance sheet date. For Bridge House Estates and City's Cash, operational assets are carried at cost.

For all entities, investment properties are reported at fair value at the balance sheet date.

The Corporation applies an annual revaluation process for investment properties and higher value operational assets to provide assurance that carrying values are not materially misstated; with the remainder of the non material value assets being revalued every 5 years. The Corporation has appointed four different valuers for investment property and other operational land and buildings. Internal valuers also carry out some valuations at year end.

Due to the significant value of the land, buildings, dwellings and investment properties and the high degree of estimation uncertainty, there is a risk over the valuation of these assets where valuations are based on assumptions or where updated valuations have not been provided for a class of assets at the year-end.

The Pension Fund does not carry any Property, plant & equipment or Investment property.

Planned audit approach

Our audit procedures will include the following:

- Assess the qualifications and competence of the valuers used;
- Review the instructions provided to the valuers and review the values' skills and expertise in order to determine if we can rely on the management expert;
- Confirm that the basis of valuation for assets valued in year is appropriate based on their usage;
- Review accuracy and completeness of asset information provided to the valuer such as rental agreements and land plot / building sizes;
- Review assumptions used by the valuers and movements against relevant indices for similar classes of assets and follow up valuation movements that appear unusual; and
- Discuss with our Real Estate Team the reasonableness of assumptions on benchmark and yields range for investment properties.

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There is a risk the membership data and cash flows used by the actuary in the roll-forward valuation may not be correct, or the valuation uses inappropriate assumptions to value the liability.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach (accurate membership data)

Substantive testing approach (assumptions)

Risk highlighted by Corporation

Risk detail

The LGPS pension fund is required to report the pension liability for estimated promised future benefits for the whole fund.

The Corporation's share of the net liability, including its share of the assets held in the pension fund, is allocated across the funds in proportion to the payroll cost for each fund. The City Fund also reports the pension liability for the City Police pension scheme. This is an unfunded scheme.

An actuarial estimate of the liability is calculated by an independent firm of actuaries.

The estimate will be based on the submission of membership data from the 2019 triennial valuation exercise for the LGPS and the 2017 triennial valuation for the police pension, updated at 31 March 2020 for factors such as mortality rates and expected pay rises along with other assumptions around inflation when calculating the liability.

There is a risk the valuation is not based on appropriate membership data where there are significant changes or uses inappropriate assumptions to value the liability.

Planned audit approach

Our audit procedures will include the following:

- Assess the qualifications and competence of the actuary through the use of PwC consulting actuary (auditor's expert);

- Review the reasonableness of the assumptions used by Barnett Waddingham (management's expert) for the calculation of the liability against other local government and police pension actuaries' assumptions and other observable data using the benchmark range of acceptable assumptions provided by PwC consulting actuary (auditor's expert);
- Review the controls for providing accurate membership data to the actuary;
- Check the accuracy and completeness of the data set submitted to the actuary for the 2019 triennial valuation of the LGPS;
- Check whether any significant changes in membership data have been communicated to the actuary;
- Discuss with the actuary the continuing impact of GMP equalisation and the McCloud judgement regarding age discrimination on the pension fund liability and impact on employer fund; and
- Check the accuracy of the calculations relating to the allocation of the share of the net assets across the funds in proportion to the employer's contribution's paid to the scheme.

NDR APPEALS PROVISION

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There is a risk in relation to the estimation of the provision due to potential incomplete data and assumptions used in calculating the likely success rate of appeals.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				
Fraud risk Assess design & implementation of controls to mitigate Significant Management estimates & judgements Controls testing approach Substantive testing approach Risk highlighted by Corporation				

Risk detail

City Fund as a billing authority is required to estimate the value of potential refund of business rates arising from rate appeals, including backdated appeals. The Valuation Office Agency (VOA) provides information regarding the appeals currently being assessed and settled.

Management use this information to calculate a success rate for specific business types for settled appeals, and applies an appropriate rate to each type of business appeal still outstanding at year end.

There is a low number of appeals and settlements from the 2017 VOA list following the introduction of the Check - Challenge - Appeal process that means there is limited data on which to base the estimate for the provision. This increases the level of risk as the provision could be overstated based on the assumptions used for the 2017 VOA list provided by MHCLG that the 2010 VOA list suffered appeals losses of 4.7% over that rating period.

Planned audit approach

Our audit procedures will include the following:

- Review of the accuracy of the appeals data to confirm that it is complete based on the VOA list, and that settled appeals are removed; and
- Review of the assumptions used in the preparation of the estimate including the historic success rates to confirm that the rates applied are appropriate to outstanding 2010 appeals and the estimate of expected losses for the 2017 rating list.

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There is a risk that investment valuations may not be corrected reported at year end.				
City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				
Fraud risk				
Assess design & implementation of controls to mitigate				
Significant Management estimates & judgements				
Controls testing approach				
Substantive testing approach				
Risk highlighted by Corporation				

Risk detail

The managed investment portfolio across the funds (including pension fund assets) comprises unquoted infrastructure, private equity holdings and pooled investment vehicles.

The unquoted infrastructure funds and private equity funds are valued by the General Partner or fund manager using valuations obtained from the underlying partnerships and investments. The valuation of other funds are provided by individual fund managers and reported on a monthly basis.

Audited valuations for private equity are provided at dates that are not coterminous with the Corporation's year end and need to be updated to reflect cash transactions (additional contributions or distributions received) up to 31 March. There is a risk that private equity investments valuations may not be appropriately adjusted to include additional contributions or distributions at the year end.

There is a risk that investments may not be appropriately valued and correctly recorded in the financial statements.

Planned audit approach

Our audit procedures will include the following:

- For unquoted infrastructure and private equity investments, obtain direct confirmation of investment valuations from the General Partner or fund manager and request copies, where applicable, of the audited financial statements of the underlying partnerships (and member allocations). We will confirm that appropriate adjustments have been made to the valuations in respect of additional contributions and distributions with the funds;
- For pooled investments, obtain direct confirmation of investment valuations from the fund managers and agree independent valuations, where available, provided by the custodian;
- Obtain independent assurance reports over the controls operated by both the fund managers and custodian for valuations and existence of underlying investments in the funds; and
- Agree the allocation of amounts for each fund where there is pooling of investments across the funds.

IMPAIRMENT ALLOWANCE FOR RECEIVABLES

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There is a risk over the valuation of the allowance for the non-collection of arrears and debt.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

The City Fund recognises an allowance for the non-collection of receivables primarily in respect of council tax, NDR, housing benefit overpayments, housing rents and parking penalty charges.

Management assesses each type of receivable separately in determining how much to allow for non-collection.

There is a risk over the valuation of this allowance if incorrect assumptions or source data are used, or an inappropriate methodology is applied.

The Pension Fund does not carry significant amounts for receivables.

Planned audit approach

Our audit procedures will include the following:

- Review the provision model for significant income streams and receivables and debt balances to assess whether it appropriately reflects historical collection rates by age of debt or arrears, and for financial assets within the scope of IFRS 9 that this also reflects expected credit losses; and
- Check that information has been accurately extracted from systems to support the modelling of collection rates by age.

RELATED PARTY TRANSACTIONS

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There is a risk that related party disclosures are not complete and accurate.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

Whilst you are responsible for the completeness of the disclosure of related party transactions in the financial statements, we are also required to consider related party transactions in the context of fraud as they may present greater risk for management override or concealment or fraud. Our audit approach includes the consideration of related party transactions throughout the audit including making enquiries of management and the Audit and Risk Management Committee.

There is a risk that related party disclosures are not complete and accurate, and disclosed in accordance with the applicable reporting framework for each fund / entity.

Historically members / trustees of each entity have provided year end declarations but the requirements to consider other connected parties (inc. family and business connections) may not have been explicitly considered.

Planned audit approach

Our audit procedures will include the following:

- Review management processes and controls to identify and disclose related party transactions;
- Review relevant information concerning any such identified transactions;
- Discuss with management and review members' and management declarations to ensure that there are no potential related party transactions which have not been disclosed; and
- Undertaken Companies House and Charity Commission searches for potential undisclosed interests.

PENSION CONTRIBUTIONS

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There is a risk that the Corporation or other admitted and scheduled employers may not be calculating contributions correctly or paying over the full amount due to the pension fund.

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GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

Employers are required to deduct amounts from employee pay based on tiered pay rates and to make employer contributions in accordance with rates agreed with the actuary.

Additional contributions are also required against pension strain for early retirements.

There is a risk that the Corporation or other admitted and scheduled employers may not be calculating contributions correctly or paying over the full amount due to the pension fund.

Planned audit approach

Our audit procedures will include the following:

- Test amount payable by employers / receivable by the pension fund for normal contributions including checking to employer payroll records;
- Ensure that income is recognised in the correct accounting period where the employer is making payments in the following month;
- We will perform tests over pension strain contributions due from employers for early retirements with undiscounted pensions;
- Agree total contributions payable by the Corporation (as employer) to the amounts received in the pension fund; and
- Review contributions income in accordance with the Actuary's Rates and Adjustments Certificate, including specified increased rates to cover the minimum contributions to be paid as set out in the Certificate.

PENSIONS BENEFITS PAYABLE

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There is a risk that pension benefits payable may not be correct or paid to non-existent members.

City Fund	Pension Fund	City's Cash	Bridge House Estates	Sundry Trusts
GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

There is a risk that pension benefits payable may not be correct based on accrued benefits of members or may not be in calculated in accordance with the scheme regulations.

Planned audit approach

Our audit procedures will include the following:

- For members leaving the scheme and deferring their pension and members becoming entitled to receive pension during the year, we will check a sample of calculations of pension entitlement;
- Check the correct application of annual pension uplift for members in receipt of benefits;
- Test a sample of pensioners in receipt of pensions to underlying records to confirm the existence of the member and also review the results of the checks undertaken by ATMOS on the existence of pensioners;
- Review the results of the latest National Fraud Initiative data matching exercise of members in receipt of benefits with the records of deceased persons and what actions have been taken to resolve potential matches; and
- Cross check payments to movements in the membership statistics.

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There is a risk that the costs of restructuring will not be calculated on a reasonable basis and not disclosed correctly.

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GSM&D				

Fraud risk

Assess design & implementation of controls to mitigate

Significant Management estimates & judgements

Controls testing approach

Substantive testing approach

Risk highlighted by Corporation

Risk detail

Barking Power, a subsidiary of City's Cash, is responsible for the rehabilitation of the current site. The decommissioning provision is in place to capture the costs associated with this rehabilitation

There is a risk that the costs of restructuring will not be calculated on a reasonable basis and not disclosed correctly. The provision has increased by £8.7m in FY19 and there were significant estimates and assumptions built into this, including the contingency costs and contractor risks factored in.

There is a risk the definition of a provision under FRS 102 has not been met with regard to these costs, and that estimates and assumptions are incorrect.

Planned audit approach

We will undertake the following audit procedures in this area:

- Use professional scepticism on each category of cost built into the provision to determine if costs; were a present obligation due to past usage of the facility, were probable (more likely than not), and could be measured reliably;
- Challenge the costs provided for by management, tying figures back to independent expert reports (where applicable), testing reasonability of assumptions by using judgement, and performing recalculation of key calculations; and
- Evaluate whether the management experts used have the necessary competence, capabilities, and objectivity for the purposes of accurately analysing the costs associated with decommissioning.

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Corporation's responsibilities

It is the responsibility of Members of the Corporation and Chamberlain to make an assessment for each of the Fund's (City Fund, Pension Fund, Bridge House Estates, City Cash and the Sundry Trusts) ability to continue as a going concern to support the basis of preparation for the financial statements. This is a requirement of the accounting standards.

This assessment should be supported by detailed cash flow forecasts with clear details of the key underlying assumptions, consideration of available finance throughout the forecast period, and a consideration of the forecast's sensitivity to reasonably possible variations in those assumptions along with any other relevant factors.

The going concern assessment should cover a minimum of 12 months from the date of the officers' approval of the financial statements. However, consideration should also be given to any major events or circumstances that may fall outside this period.

Auditor responsibilities

Our responsibilities in respect of going concern are:

- To obtain sufficient appropriate audit evidence regarding, and conclude on, i) whether a material uncertainty related to going concern exists; and ii) the appropriateness of management's use of the going concern basis of accounting in the preparation of the financial statements; and
- To report in accordance with ISA (UK) 570.

We will obtain an understanding of the business model, objectives, strategies and related business risk, the measurement and review of the Funds' financial performance including forecasting and budgeting processes and the Funds' risk assessment process. We will evaluate:

- The method, including the relevance and reliability of underlying data used to make the assessment, whether assumptions and changes to assumptions from prior years are appropriate and consistent with each other;
- The plans for future actions in relation to the going concern assessment including whether such plans are feasible in the circumstances; and
- The adequacy and appropriateness of disclosures in the financial statements regarding the going concern assessment and any material uncertainties that may exist.

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OVERVIEW

We have assessed the following as use of resources audit risks. These are matters assessed as most likely to impact on our use of resources conclusion and include those that will have the greatest effect on audit strategy, the allocation of audit resources and the amount of audit focus by the engagement team.

Description of risk		
■ Significant risk		
■ Normal risk		
	City Fund	Overview of risk
Police financial management		There is a need for City Police to develop an MTFS with significant savings to ensure that it can continue to deliver the level of policing required in the City.
Sustainable finances		The Corporation will need to deliver planned savings to maintain financial sustainability in the medium term and there is a significant risk that these savings may not be delivered.

POLICE FINANCIAL MANAGEMENT

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There is a need for City Police to develop an MTFS with significant savings to ensure that it can continue to deliver the level of policing required in the City.	
City Fund	
Assess design & implementation of controls to mitigate	
Review work of other inspectorates	
Review work undertaken by internal audit	
Detailed review	
Risk highlighted by Corporation	

Risk detail

As at quarter 3, the City of London Police is forecasting an overspend of £0.7m by the end of the 2019/20 which is an improved position from £2.2m overspend reported at quarter 2. The overspend is primarily due to an unfunded increase in police officer pension contributions of £2.2m plus a part-year (£1m) effect of recruiting towards 67 growth roles, offset by full use of the POCA reserve of £2.5m. Restrictions on staff recruitment have been in place to manage the forecast position and these will continue with the aim of bringing this back into balance by the end of the year.

The City Police are forecasting an underlying budget deficit of £11.1m in 2020/21, rising to £16.8m per annum by 2023/24. It is planned that the City Fund will provide £5.4m of support in 2020/21, with City Police responsible for making necessary savings of £5.7m in 2020/21 rising to £9.2m in 2023/24 to balance budgets. It has been proposed that the business rates premium is increased by 0.2p to 0.8p in the £ as this will raise £5m in order to cover the support needed by the City Fund along with the Police savings that would balance the budget in 2020/21.

Although the 2020/21 budget can be balanced, City Police are likely to be required to make difficult decisions in order to meet savings targets necessary over the medium-term in order to balance revenue budgets and generate funds needed to deliver capital programmes that are currently unfunded.

Planned audit approach

Our audit procedures will include the following:

- Review the assumptions used in the Medium Term Financial Strategy and assess the reasonableness of the cost pressures, the amount of Government grant applied and increases in the business premium;
- Monitor the delivery of the budgeted savings in 2019/20 and the plans to reduce costs from 2020/21; and
- Review the strategies and any transformation programmes to close the budget gap after 2020/21.

SUSTAINABLE FINANCES

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The Corporation will need to deliver planned savings to maintain financial sustainability in the medium term and there is a significant risk that these savings may not be delivered.

City Fund

Assess design & implementation of controls to mitigate

Review work of other inspectorates

Review work undertaken by internal audit

High level review

Risk highlighted by Corporation

Risk detail

As at quarter 3 the City Fund forecast an overspend of £1.2m against its 2019/20 budget. The majority of this related to overspends in respect of the Barbican due to increased costs and a delay in restructuring teams to deliver agreed savings. All non-statutory or uncommitted spend has been put on hold and changes to the programme in the final quarter have been put in place to try and manage the projected overspend.

The 2020/21 City Fund budget forecasts a surplus of £27.3m. This has mainly been achieved through opportunities to increase income and make savings that do not impact on front line services, as identified by the Fundamental Review. This includes income proposals of £19.5m, savings/resource reductions of £8.8m and a £6.7m draw on reserves. The Government has also pushed back its reform of Business Rates to 2021/22 which means there is an extra year of retaining the current level of rates before they are reduced. Despite the savings made to date in the Fundamental review and those identified over the next year, City Fund faces substantial growing deficits over the medium term starting in 2021/22 (£15.2m) growing to a deficit of £31m by the end of 2023/24 which, at present, can only be reduced and budgets balanced through use of reserves.

The impact of capital projects, such as the Museum of London and the combined courts building, is a major factor contributing to these deficits in the medium-term and over a longer 10-year horizon. The deficit could increase if the financial strategy is weighted towards borrowing, rather than asset disposal, due to the statutory need to provide an annual contribution to debt repayment. Budgets over the medium-term also include a substantial proportion (25%) of proposals relating to income generation which, the achievement of, is far less certain than cost savings and therefore a risk to the sustainability of the MTFs.

Identifying the required savings in the medium-term will be a challenge and is likely to require difficult decisions around service provision.

Planned audit approach

Our audit procedures will include the following:

- Review the assumptions used in the Medium Term Financial Strategy and assess the reasonableness of the cost pressures, the level of Government grant and business rates applied and income generation proposals;
- Monitor the delivery of the budgeted savings in 2019/20 and the plans to reduce costs from 2020/21; and
- Review the strategies and any transformation programmes to close any budget gap after 2020/21.

OTHER MATTERS REQUIRING FURTHER DISCUSSION

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Fraud

Whilst the Chamberlain and the Court of Common Council have ultimate responsibility for the prevention and detection of fraud, and the Audit and Risk Management Committee has oversight of the Anti-Fraud and Corruption strategy as those charged with governance, we are required to obtain reasonable assurance that the financial statements are free from material misstatement, including those arising as a result of fraud. Our audit approach includes the consideration of fraud throughout the audit and includes making enquiries of management and those charged with governance.

For City Fund, we have been made aware of a number of low value actual, alleged or suspected incidences of fraud committed by users of the Corporation's services (misuse of blue badges, benefits fraud, RTB discounts, sublet of housing, claiming of council tax or NDR reliefs etc.). We request confirmation from the Audit and Risk Management Committee on fraud and a discussion on the controls and processes in place to ensure timely identification and action.

We have not been made aware of any instances of actual/ suspected fraud at the other entities.

We will review the fraud register and liaise with internal audit to determine any actual, suspected or alleged fraud known to them. We will discuss with management any knowledge they have of suspected or alleged fraud.

We will consider management's process for identifying and responding to the risks of fraud, including the nature, extent and frequency of such assessments. In particular, we will make enquiries of management outside of the finance function where the risk of fraud could originate.

Significant estimates

We will report to you on significant estimates. We will seek to understand and perform audit testing procedures on accounting estimates and judgements including consideration of the outcome of historic judgements and estimates. We will report to you our consideration of whether management estimates and judgements are within an acceptable range.

Laws and regulations

We will consider compliance with laws and regulations. The most significant of these for your business includes VAT legislation and Employment Taxes. We will make enquiries of management and review correspondence with the relevant authorities.

Internal audit

We will ensure that we maximise the benefit of the overall audit effort carried out by internal audit and ourselves, whilst retaining the necessary independence of view.

We understand that internal audit reviews have been undertaken across a range of accounting systems and governance subjects. We will review relevant reports as part of our audit and consider whether to place any reliance on internal audit work as evidence of the soundness of the control environment.

Accounting policies

We will report to you on significant qualitative aspects of your chosen accounting policies. We will consider the consistency and application of the policies and we will report to you where accounting policies are inconsistent with the applicable financial reporting framework for each fund, relevant accounting standards or other direction under the circumstances.

Financial statement disclosures

We will report to you on the sufficiency and content of your financial statement disclosures.

Any other matters

We will report to you on any other matters relevant to the overseeing of the financial reporting process. Where applicable this includes why we consider a significant accounting practice that is acceptable under the financial reporting framework not to be the most appropriate.

IT GENERAL CONTROLS

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IT General Controls (ITGCs) are the policies and procedures that relate to many IT applications and support the effective functioning of application controls by helping to ensure the continued proper operation of information systems. They commonly include controls over data centre and network operations; system software acquisition, change and maintenance; access security; and application system acquisition, development, and maintenance.

ITGCs are an important component in systems of internal control, and sometimes have a direct impact on the reliability of other controls.

IT assurance is embedded in our audit strategy to ensure the IT systems provide a suitable platform for the control environment and is undertaken in conjunction with our IT Assurance team. Our testing strategy, supported by our Technology Risk Assurance specialists, includes a tailored range of data analytics, system configuration and IT environment testing.

We will also obtain an understanding of the information system, including the related business processes relevant to financial reporting, to include:

- Oracle
- Paris
- iTrent
- Northgate (City Fund only)
- Capita (City Fund only)
- Altair (Pension Fund only)
- Blackbaud Grant Making (BHE only)



INDEPENDENCE

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Under ISAs (UK) and the FRC’s Ethical Standard we are required, as auditors, to confirm our independence.

We have embedded the requirements of the Standards in our methodologies, tools and internal training programmes. Our internal procedures require that audit engagement partners are made aware of any matters which may reasonably be thought to bear on the integrity, objectivity or independence of the firm, the members of the engagement team or others who are in a position to influence the outcome of the engagement.

This document considers such matters in the context of our audit for the year ending 31 March 2020.

Non-audit services

Details of services and fees other than audit, provided by us to the Corporation during the period and up to the date of this report are set out in the appendices.

Details of rotation arrangements for key members of the audit team and others involved in the engagement are set out in the appendices.

Details of other threats and safeguards applied are given in the appendices.

We have not identified any other relationships or threats that may reasonably be thought to bear on our objectivity and independence.

We confirm that the firm, the engagement team and other partners, directors, senior managers and managers conducting the audit comply with relevant ethical requirements including the FRC’s Ethical Standard and are independent of the Corporation.

We also confirm that we have obtained confirmation of independence external audit experts involved in the audit comply with relevant ethical requirements including the FRC’s Ethical Standard and are independent of the Corporation.

Should you have any comments or queries regarding any independence matters we would welcome their discussion in more detail.

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CORPORATION’S RESPONSIBILITIES

The Corporation’s responsibilities and reporting

Financial reporting

The Corporation is expected to have effective governance arrangements to deliver its objectives. To this end, the publication of the financial statements is an essential means by which the Corporation accounts for its stewardship and use of the public and charitable money at its disposal.

The form and content of the Corporation’s financial statements for each fund/entity should reflect the requirements of the relevant accounting and reporting framework in place and any applicable accounting standards or other direction under the circumstances.

Our audit of the financial statements does not relieve management nor those charged with governance of their responsibilities for the preparation of the financial statements.

City Fund and Pension Fund

The Chamberlain (as Section 151 Officer) is responsible for preparing and publishing a Statement of Accounts and financial statements which show a true and fair view in accordance with CIPFA Code of Practice on Local Authority Accounting 2019/20, applicable accounting standards or other direction under the circumstances.

The Corporation is also required to prepare schedules or returns to facilitate the preparation of consolidated accounts such as HM Treasury’s Whole of Government Accounts for the City Fund.

City’s Cash

The Corporation is responsible for preparing the annual report and financial statements for City’s Cash. The Corporation has elected to prepare the financial statements in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102).

Bridge House Estates and the Sundry Trusts

The Trustee is responsible for preparing and filing an annual report and financial statements which show a true and fair view and are prepared in accordance with the Charities Act 2011, FRS 102, the Charities SORP (2nd Edition) and the provisions of the charities’ governing documents.

Guildhall School of Music and Drama

The Trustee is responsible for preparing an Income and Expenditure report in accordance with the Further and Higher Education SORP 2015.

Use of resources - City Fund

Local authorities are required to maintain an effective system of internal control that supports the achievement of their policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at their disposal.

As part of the material published with its financial statements, the City Fund is required to bring together commentary on its governance framework and how this has operated during the period in a governance statement.

In preparing its governance statement, the Corporation will tailor the content to reflect its own individual circumstances, consistent with the requirements of the relevant accounting and reporting framework and having regard to any guidance issued in support of that framework. This includes a requirement to provide commentary on their arrangements for securing value for money from their use of resources.

CORPORATION'S RESPONSIBILITIES 2

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Corporation's responsibilities

- Maintain adequate accounting records and maintain an appropriate system of internal control for the organisation
- Prepare the annual report and the financial statements which give a true and fair view
- Safeguard the assets of the organisation and take reasonable steps for the prevention and detection of fraud and other irregularities.

To make available to us, as and when required, all the organisation's accounting records and related financial information.

To provide us with relevant committee papers on key issues including but not limited to:

- Review of business risks
- Going concern assessments
- Impairment reviews
- Any key judgments and estimates.

Having made enquiries of fellow members of the Corporation and the organisation's auditors, state that:

- So far as they are aware, there is no relevant audit information of which the organisation's auditors are unaware
- They have taken all reasonable steps they ought to have taken in order to make themselves aware of any relevant audit information and to establish that the organisation's auditors are aware of that information.

What this means

Further information regarding these responsibilities is provided in the engagement letters.

We are happy to explain these in more detail to you.

This includes information required from subsidiary companies incorporated in the UK and officers, employees or auditors of those subsidiary companies.

In addition to answering our queries, this requires proactive behaviour in order to make us aware of any relevant information. Relevant information is very broad and includes any information needed in connection with our report.

It would, for example, include (but clearly not be limited to) the details of any contracts and agreements (including side contracts and agreements), or any matters that could affect our assessment of your going concern review such as any matters that you are aware of that might affect future trading or any special arrangements with HRMC or your inclusion in a Banks 'special lending division' or equivalent.

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Audit quality

Cycle of continuous improvement

Our responsibilities and reporting - financial statements

We are responsible for performing our audit under International Standards on Auditing (UK) to form and express an opinion on the financial statements of each fund of the Corporation. We report our opinion on the financial statements to the members of the Corporation.

We read and consider the 'other information' contained in the annual report for each fund such as the additional narrative reports. We will consider whether there is a material inconsistency between the other information and the financial statements or other information and our knowledge obtained during the audit.

For statutory other information (defined by the Charities SORP) for the charities we will form an opinion on whether the information given in the other information is consistent with the financial statements and our knowledge obtained in the audit and whether the reports have been prepared in accordance with applicable legal requirements.

Our responsibilities and reporting - use of resources

We are required to satisfy ourselves that the Corporation, in respect of the activities of the City Fund, has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

This means that we have regard to relevant guidance issued by the NAO and undertake sufficient work to be able to satisfy ourselves as to whether the Council has put arrangements in place that support the achievement of value for money.

What we don't report

Our audit is not designed to identify all matters that may be relevant to the Corporation and Audit and Risk Management Committee and cannot be expected to identify all matters that may be of interest to you and, as a result, the matters reported may not be the only ones which exist.



COMMUNICATION WITH YOU

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Those charged with governance

References in this report to Those Charged With Governance are to the Corporation as a whole. For the purposes of our communication with those charged with governance you have agreed we will communicate primarily with the Audit and Risk Management Committee.

In communicating with the Corporation, we consider those charged with governance of the other entities within the scope of this report to be informed about matters relevant to their charity, company or fund. Please let us know if this is not appropriate.

Communication, Meetings and Feedback

We request feedback from you on our planning and completion report to promote two way communication throughout the audit process and to ensure that all risks are identified and considered; and at completion that the results of the audit are appropriately considered.

We will meet with management throughout the audit process. We will issue regular updates and drive the audit process with clear and timely communication, bringing in the right resource and experience to ensure efficient and timely resolution of issues.

Planning Report

The Planning Report sets out all planning matters which we want to draw to your attention including audit scope, our assessment of audit risks and materiality.

Internal Controls

We will consider internal controls relevant to the preparation of financial statements in order to design our audit procedures and complete our work. This is not for the purpose of expressing an opinion on the effectiveness of internal control.

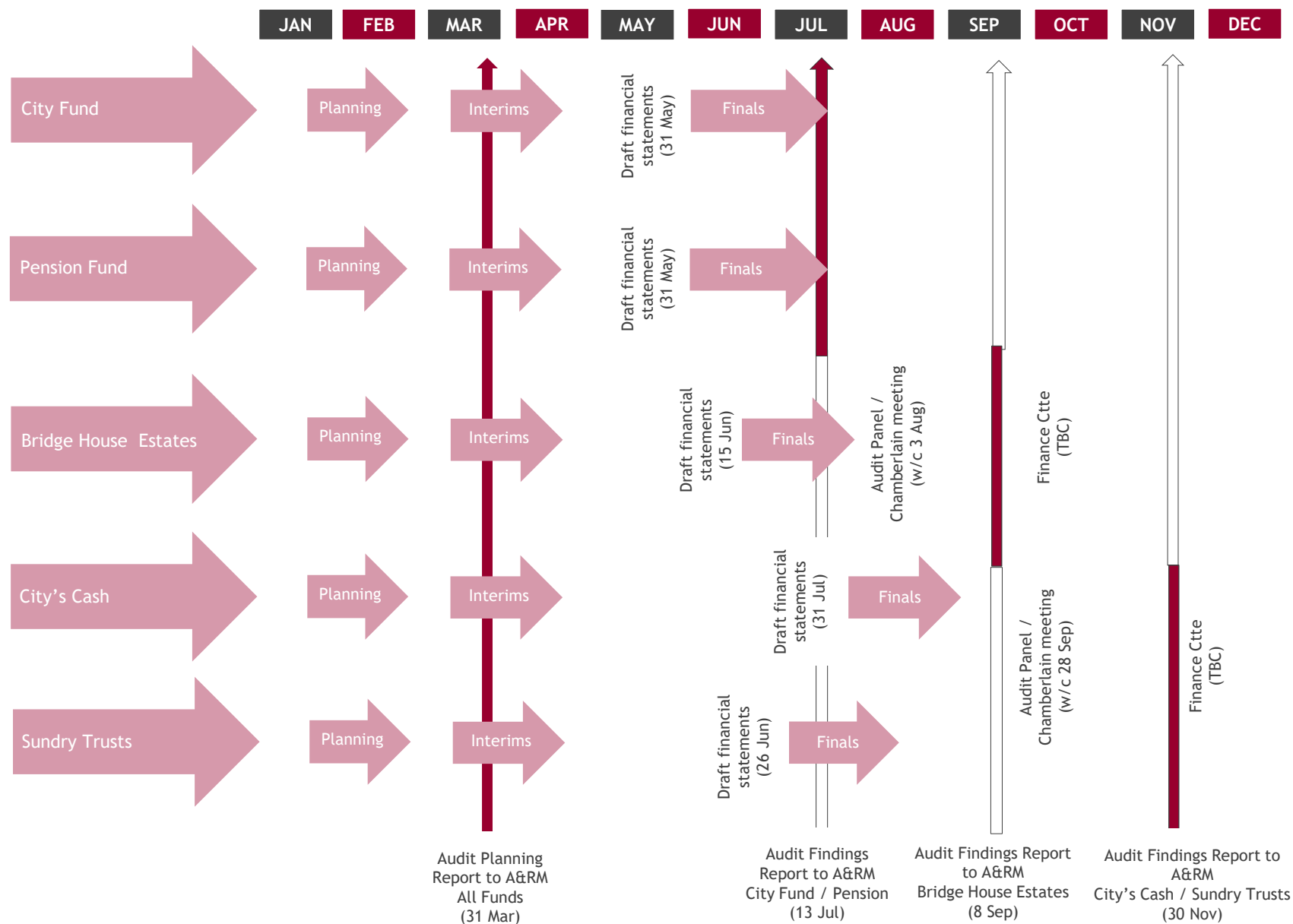
Audit Completion Report

At the conclusion of the audit, we will issue an Audit Completion Report for each fund to communicate to you key audit findings before concluding our audit opinion. We will include any significant deficiencies in internal controls which we identify as a result of performing audit procedures. We will meet with you to discuss the findings and in particular to receive your input on areas of the financial statements involving significant estimates and judgements and critical accounting policies.

Once we have discussed the contents of the Audit Completion Report with you and having resolved all outstanding matters we will issue a final version of the Report.

AUDIT TIMELINE

An overview of the key dates



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TEAM MEMBER ROTATION

These tables indicate the latest rotation periods normally permitted under the FRC’s Ethical Standards for independence.

In order to safeguard audit quality we will employ a policy of gradual rotation covering the team members below as well as other senior members of the engagement team to ensure a certain level of continuity from year to year.

Senior team members	City Fund	Pension Fund	City’s Cash	Bridge House Estates	Sundry Trusts	GSM&D	Rotation to take place before
Leigh Lloyd-Thomas - Engagement Lead	5	5					10 years (5 years if direct PSAA appointment)
Fiona Condron - Engagement Lead			2	2	2	2	10 years
Kerry Barnes - Senior Manager ⁽¹⁾	3						10 years
Peter Lewis - Senior Manager			2	2	2	2	10 years
Francesca Palmer - Audit Manager		1					10 years
James Hay - Audit Manager			2	2	2	2	10 years
Grace Emson - Audit Assistant Manager			1	1	1	1	10 years
Independence - audit quality control							
Engagement Quality Control Reviewer (EQCR)	2	2					

⁽¹⁾ Kerry Barnes was the Audit Manager for 2015/16 and 2016/17, this is Kerry’s third year overall. Francesca Palmer was the Audit Manager for the City Fund for 2017/18 and 2018/19.

City Fund and Pension Fund

Regulations prescribe that any local public body with gross income or expenditure greater than £500 million, or maintains a pension fund with gross assets greater than £1 billion or more than 20,000 members, is classified as a ‘major local audit’. A major local audit is subject to enhanced independent quality control review. It also falls within the scope of the Financial Reporting Council’s Audit Quality Review Team.

In 2018/19, the City Fund and pension fund exceeded the thresholds above and became a ‘major local audit’ as the pension fund had gross assets greater than £1 billion. The engagement therefore required the appointment of an Engagement Quality Control Review to provide an additional independent review of the audit. This is expected to continue for 2019/20, as is the fact that gross expenditure is expected to be over £500m.

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MATERIALITY: DEFINITION AND APPLICATION

Concept and definition

The concept of materiality is fundamental to the preparation of the financial statements and the audit process and applies not only to monetary misstatements but also to disclosure requirements and adherence to appropriate accounting principles and statutory requirements.

We apply the concept of materiality both in planning and performing our audit, and in evaluating the effect of misstatements. For planning, we consider materiality to be the magnitude by which misstatements, including omissions, could influence the economic decisions of reasonable users that are taken on the basis of the financial statements. In order to reduce to an appropriately low level the probability that any misstatements exceed materiality, we use a lower materiality level, performance materiality, to determine the extent of testing needed. Importantly, misstatements below these levels will not necessarily be evaluated as immaterial as we also take account of the nature of identified misstatements, and the particular circumstances of their occurrence, when evaluating their effect on the financial statements as a whole.

Materiality therefore has qualitative as well as quantitative aspects and an item may be considered material, irrespective of its size, if it has an impact on (for example):

- Narrative disclosure e.g. accounting policies, going concern
- Instances when greater precision is required (e.g. senior managers remuneration and related party transactions).

International Standards on Auditing (UK) also allow the auditor to set a lower level of materiality for particular classes of transaction, account balances or disclosures for which misstatements of lesser amounts than materiality for the financial statements as a whole could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Calculation and determination

We have determined materiality based on professional judgement in the context of our knowledge of the Corporation, including consideration of factors such as industry developments, financial stability and reporting requirements for the financial statements.

We determine materiality in order to:

- Assist in establishing the scope of our audit engagement and audit tests
- Calculate sample sizes
- Assist in evaluating the effect of known and likely misstatements on the financial statements.

Reassessment of materiality

We will reconsider materiality if, during the course of our audit engagement, we become aware of facts and circumstances that would have caused us to make a different determination of planning materiality if we had been aware.

Further, when we have performed all our tests and are ready to evaluate the results of those tests (including any misstatements we detected) we will reconsider whether materiality combined with the nature, timing and extent of our auditing procedures, provided a sufficient audit scope.

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If we conclude that our audit scope was sufficient, we will use materiality to evaluate whether uncorrected misstatements (individually or in aggregate) are material.

You should be aware that any misstatements that we identify during our audit, both corrected and uncorrected errors, might result in additional audit procedures being necessary.

Unadjusted errors

We will communicate to you all uncorrected misstatements identified during our audit, other than those which we believe are 'clearly trivial'.

Clearly trivial is defined as matters which will be of a wholly different (smaller) order of magnitude than the materiality thresholds used in the audit, and will be matters that are clearly inconsequential, whether taken individually or in aggregate.

We will obtain written representations from the Audit and Risk Management Committee confirming that in their opinion these uncorrected misstatements are immaterial, both individually and in aggregate and that, in the context of the financial statements taken as a whole, no adjustments are required.

We will request that you correct all uncorrected misstatements. In particular we would strongly recommend correction of errors whose correction would affect compliance contractual obligations or governmental regulations. Where you choose not to correct all identified misstatements we will request a written representation from you setting out your reasons for not doing so and confirming that in your view the effects of any uncorrected misstatements are immaterial, individually and in aggregate, to the financial statements as whole.

MATERIALITY: PRINCIPAL ENTITIES

The basis for setting materiality for the funds is set out in the Executive Summary. Overall financial statement materiality has been assessed against a benchmark of assets held by each entity. A lower, specific materiality, has been set with reference to income and expenditure in the performance statement.

	2019/20				2018/19		
	Materiality	Trivial	Specific materiality	Specific triviality	Materiality	Specific materiality	Trivial
City Fund	£32.3m	£646,000	£7.2m	£144,000	£32.7m	£7.2m	£654,000
Pension Fund	£10.6m	£212,000	£2.09m	£42,000	£10.6m	£2.09m	£210,000
Bridge House Estates	£31m	£625,000	£2.15m	£43,000	£14.5m	£425,000	£290,000
City's Cash	£65.5m	£1.3m	£8.34m	£167,000	£32.8m	£1.6m	£657,000

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MATERIALITY: OTHER ENTITIES

The basis for setting materiality for the sundry trusts, is expenditure for all Trusts whose deficits are funded by City of London Corporation and gross assets for all other Trusts/entities. A lower specific materiality has been set for those entities whose items of income and expenditure are significantly lower than the asset base. Specific materiality is applied to those areas of the financial statements where a misstatement would normally affect net income before investment gains and losses.

	2019/20			
	Materiality	CT	Specific materiality	Specific CT
	£	£	£	£
Ashtead Common	11,000	1,000	-	-
Preservation of the common at Ashtead				
Burnham Beeches	21,500	1,000	-	-
Preservation of the open space known as Burnham Beeches				
Epping Forest	156,000	3,000	-	-
Preservation of Epping Forest in perpetuity				
Hampstead Heath (consolidated)	1,050,000	21,000	480,000	9,000
Preservation of Hampstead Heath for the recreation and enjoyment of the public				
Highgate Wood & Queens Park Kilburn	28,000	1,000	-	-
Preservation of Hampstead Heath for the recreation and enjoyment of the public				
West Ham Park	30,000	1,000	-	-
To maintain and preserve the Open Space known as West Ham Park				

In accordance with BDO audit methodology, clearly trivial should be set at 2% of materiality for both financial statement and specific materiality. For many of the smaller charities, this results in a very small value in absolute terms.

We therefore seek the Committee's approval to report to you individual clearly trivial items of a value greater than £1,000. Our audit procedures will however consider any items at the lower levels of clearly trivial both individually and in aggregate.

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	2019/20			
	Materiality	CT	Specific materiality	Specific CT
	£	£	£	£
West Wickham Common and Spring Park Coulsdon & Other Commons Preservation of West Wickham Common and Spring Park Coulsdon & Other Commons	28,000	1,000	-	-
Hampstead Heath Trust To meet a proportion of the maintenance cost of Hampstead Heath	665,000	13,000	67,500	1,000
Keats House Maintenance of Keats House	7,000	1,000	-	-
Sir Thomas Gresham Charity * To provide a programme of public lectures	1,000	-	-	-
Charities Administered ICW the City of London Freemen's School Promotion of education through prizes	4,000	1,000	-	-
City Educational Trust Fund Advancement of education through grants	77,000	1,500	12,500	1,000
City of London Almshouses Almshouses for poor or aged people	63,500	1,000	18,500	1,000

* Given the low volume and value of transactions a de-minimus level of £1,000 is proposed for materiality.

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		2019/20		
	Materiality	CT	Specific materiality	Specific CT
City of London Corporation Combined Education Charity Advancing education by the provision of grants and financial assistance	23,000	1,000	-	-
City of London Corporation Relief of Poverty Charity Relief of poverty for widows, widowers or children of a Freeman of the City of London	10,000	1,000	-	-
City of London Freeman's School Bursary Fund Promotion of education through bursaries	19,500	1,000	-	-
City of London School Bursary Fund Promotion of education through bursaries, scholarships and prizes	80,500	1,500	-	-
City of London School Education Trust * Advancing education	1,000	-	-	-
City of London School for Girls Bursary Fund Promotion of education through bursaries, scholarships and prizes	94,500	1,500	36,000	1,000
Corporation of London Charities Pool Investments pool for Sundry Trusts	434,000	8,500	66,000	1,000
Emmanuel Hospital Payment of pensions and financial assistance to poor persons	54,000	1,000	-	-
Guildhall Library Centenary Fund * Provision of education and training in library, archives, museum, and gallery services	1,000	-	-	-

* Given the low volume and value of transactions a de-minimus level of £1,000 is proposed for materiality.

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	2019/20			
	Materiality	CT	Specific materiality	Specific CT
King George's Field Open space for sports, games and recreation	1,000	-	-	-
Samuel Wilson's Loan Trust Granting of low interest loans to young people who have or are about to set up in business	51,000	1,000	4,000	1,000
Sir William Coxen Trust Fund Granting of assistance to eligible charitable trusts in the form of donations	53,000	1,000	-	-
Vickers Dunfee Memorial Benevolent Fund Financial assistance to distressed past and present members of the City of London Special Constabulary and their dependents	4,500	1,000	-	-
Guildhall School of Music and Drama A Higher Education Institution offering professional training in music, acting and technical theatre arts	665,000	13,000	-	-

* Given the low volume and value of transactions a de-minimus level of £1,000 is proposed for materiality.

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AQR RESULTS 2018/19

BDO performance

Overview

The FRC released their Audit Quality Review (AQR) results for the 7 largest accountancy firms in July 2019 for the review period 2018/19. A copy of all of the reports can be found on the FRC Website. We are very proud of our results in this review period where, for the second year running, 7 of the 8 files reviewed were assessed as either good or requiring only limited improvements.

Firm's results

The graphs demonstrates our performance in relation to the other 6 largest firms and our continuous improvements and maintenance of that improvement over the last 6 review periods .

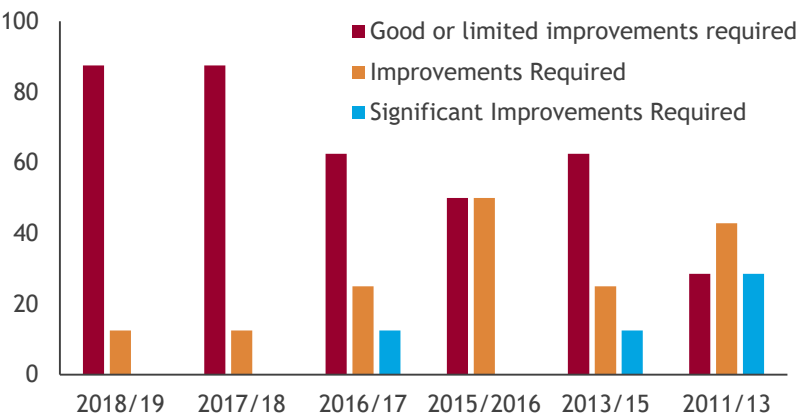
We include details of our model 'The Cycle of Continuous Improvement' on the next page. We acknowledge that the firm has performed well over the last few years however we are not complacent and need a strong process in place to maintain this high level of audit quality and deal rapidly and effectively with issues as they arise. This also highlights how our program of root cause analysis plays an important role in high audit quality.

We would encourage you to read our report which includes:

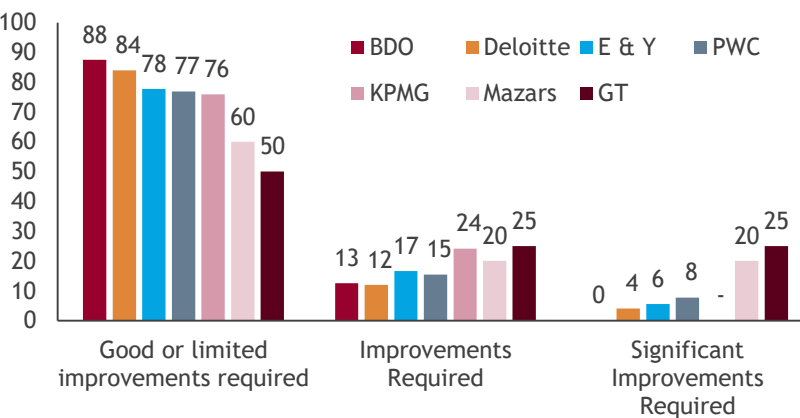
- Details of the root cause analysis we have been undertaking to address issues raised;
- The actions we have/are undertaking to address the issues raised by the AQR; and
- A number of areas of good practice the AQR review team identified whilst undertaking their review.

More details is included in our Transparency Report available on www.bdo.co.uk.

BDO AQR Results - year on year



Big 7 Firms - Results 2019



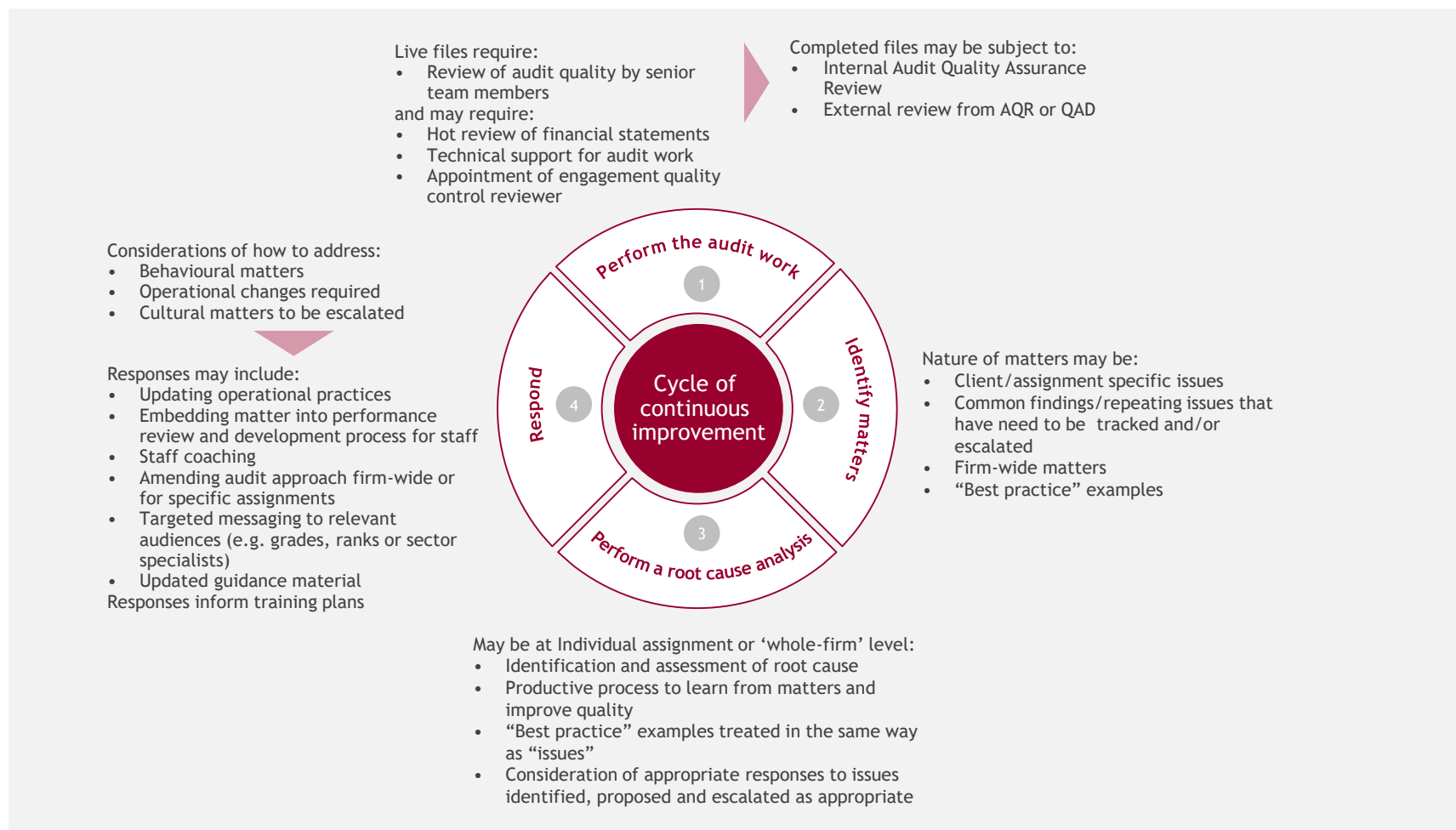
CYCLE OF CONTINUOUS IMPROVEMENT

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The matters raised in our report prepared in connection with the audit are those we believe should be brought to your attention. They do not purport to be a complete record of all matters arising. This report is prepared solely for the use of the organisation and may not be quoted nor copied without our prior written consent. No responsibility to any third party is accepted.

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Committee:	Date:
Audit and Risk Management Committee	31 March 2020
Subject: Corporate Risk Update	Public
Report of: Chamberlain	For decision
Report Author: Paul Dudley, Corporate Risk Manager	

Summary

This report seeks the Committee's endorsement of the Summit Group's decision 19 March 2020 to approve two new risks on the corporate risk register (CR33 Major Capital Schemes and CR34 Covid-19).

The Committee were advised on 28 January 2020 that two related risks were being considered for corporate risk status, the first being the major capital schemes and the second general competence in managing City Corporation projects. Summit Group on 24 February 2020 approved the major capital schemes risk whilst the Town Clerk considered the second risk to be a departmental level risk.

Given the serious current Covid-19 pandemic, Summit Group on 19 March 2020 approved a second new risk on to the corporate risk register. This risk is in relation to the spread of COVID 19 and its impacts on the delivery of the City of London Corporation's services and on staff and communities. The City Corporation have established a senior Member COVID 19 group as well as Gold, Silver and Bronze management structure and are implementing a range of plans to manage the effects of the virus on the City Corporation staff, stakeholders and critical services. This risk is being reviewed on a daily basis by COVID Gold group.

Recommendations

The Committee is asked to:

1. Endorse the decision of the Summit Group to approve the Major Capital Scheme's risk and the COVID -19 risk on to the corporate risk register.

Background

- 1 The Committee were advised at their meeting on 28 January 2020 that two related risks, one in relation to major capital schemes and a second - general competence in City Corporation project management were being considered for corporate status. Summit Group on 24 February 2020 considered and agreed that the major capital schemes risk should be included on the corporate risk register whilst the Town Clerk indicated the general competence in project management risk should be maintained at departmental level. The major capital schemes risk is now included on the corporate risk register as CR33.
- 2 Since late January/early February 2020 it has become clear that the COVID 19 virus, that originated in China, was spreading across the world. All countries are

now taking measures to delay the spread and reduce the serious impact of virus on their citizens and economies.

- 3 The City Corporation has been following UK government and Public Health England advice as well as liaising with London Authorities through London Resilience to co-ordinate a London approach. The City Corporation have established a senior Member COVID 19 group as well as Gold, Silver and Bronze management structure and are implementing a range of plans to manage the effects of the virus on the City Corporation staff, stakeholders and critical services. This risk is being reviewed on a daily basis by COVID Gold group.
- 4 Given the potential risk to the City Corporation a COVID 19 risk (ref CR34) has been approved as a corporate risk by Summit Group on 19 March 2020. This risk is in relation the spread of COVID 19 and its impacts on the delivery of the City of London Corporation's services and on staff and communities. This risk is being kept under daily review by the City Corporation's COVID Gold.
- 5 Both these corporate risks are attached as appendix 1. The total number of corporate risks is now 19 (ten red and nine amber). The next risk management report to the Committee will take place at the May 2020 meeting

Conclusion

- 6 The Committee are requested to endorse two new risks – CR33 Major Capital Schemes and CR34 COVID 19 risk.

Appendices:

APPENDIX 1 – Corporate risk register extract – CR33 Major Capital Schemes and CR34 COVID 19

Contact: *Paul.Dudley | Paul.Dudley@cityoflondon.gov.uk | 02073321297*

CR33 Major Capital Schemes

Report Author: Paul Dudley

Generated on: 20 March 2020



Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR33 Major Capital Schemes 14-Feb-2020 Peter Lisley; Paul Wilkinson	<p>Risk owner Town Clerk & City Surveyor</p> <p>Cause: The City Corporation has set itself the ambition to deliver at least three landmark multi-million-pound capital schemes over the next decade (currently programmed to complete 2028).</p> <p>Event: there is insufficient technical and professional capability and resource to effectively deliver the schemes.</p> <p>Effects:</p> <ul style="list-style-type: none"> • Schemes not delivered on time • Inability of the organisation to move at the required pace • Potential for increased capital costs as a result of delayed decision making • Reputational impact on the Corporation vis a vis key stakeholder across London and UK Govt. • Potential revenue impact of delayed delivery to services affected (e.g. Markets, Museum of London Grant, City of London Police) • failure to deliver on corporate outcomes <p>Note - given that this risk spans several years, the</p>	<p>Likelihood</p> <p>Impact</p>	16	<p>The risk remains largely unchanged since it's introduction to the Corporate Risk Register within the past month with initial steps taken to mitigate.</p> <p>There is some concern that the Covid 19 crisis could have a further impact on capacity however checks on virtual working capability across programme teams and assistance is being offered by the MPMO.</p> <p>18 Mar 2020</p>	<p>Likelihood</p> <p>Impact</p>	12	31-Mar-2021	<p>Constant</p>

APPENDIX 1

	target risk score/date has been set to March 2021 when it is expected that, after completion of the related actions, the risk score will be reduced.						
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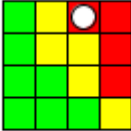


Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR33 a	Build PMO Capability utilising newly available budget.	Job Descriptions and Person Specs for a further PMO Analyst and Finance Analyst (to be approved by the Chamberlain) are being drafted following approval of the budget on 5 March 2020 – Moratorium, Job Evaluation and usual HR processes clearance is a next step.	Matthew Pitt	18-Mar-2020	31-Mar-2021
CR33 b	To Improve assurance of Major Programme Risks	Assurance of risks on each programme will take place at the monthly Major Programmes Assurance meeting chaired by the Director of Major Projects / City Surveyor with senior representation from the Chamberlain's Department, CS, TCs and Programme Directors.	Matthew Pitt	18-Mar-2020	31-Mar-2021
CR33 c	Develop Corporate Capability around Financial Modelling	To follow	Caroline Al-Beyerty		31-Mar-2021
CR33 d	Implement a standard approach to Optimism Bias Modelling	To follow	Caroline Al-Beyerty		31-Mar-2021
CR33 e	PMO to adopt a portfolio approach int management of these schemes and systematically identify and manage dependencies	A Summary Timeline of all Major Programmes has been produced and will be updated monthly (in line with the Assurance meetings above) – this clearly defines and maps dependencies and interdependencies between Programmes. A cashflow overlay onto this programme is a next step and the team will explore other tools to manage these dependencies	Matthew Pitt	18-Mar-2020	31-Mar-2021
CR33 f	To identify and monitor indicators such as climate action, apprenticeships. social benefits for each project.	A tracking document will be established to identify and monitor these areas for each programme i.e BREAM, WELL Standards, building of apprenticeships into contracts, supply chain benefits of each Programme etc. A useful precedent was set by Crossrail on these latter items.	Matthew Pitt	18-Mar-2020	31-Mar-2021
CR33 g	To regularly report progress to Summit Group for each project.	Some reporting to Summit Group took place during 2019 and that will continue into 2020 using the Major Programmes Dashboards and Timeline above. Suggested interval quarterly.	Matthew Pitt	18-Mar-2020	31-Mar-2021

CR34 COVID 19-detailed risk register INCLUDING completed actions

Report Author: Paul Dudley

Generated on: 26 March 2020

Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR34 COVID-19 Page 339 12-Mar-2020 Peter Lisley	Cause: The spread of COVID 19 has continued to escalate affecting staff, businesses, residents and visitors. Event: The spread of COVID 19 impacts on the delivery of the City of London Corporation's services and impact on our staff and communities. Effects: Through the spread of COVID 19 critical and other services are affected, information is not properly shared, proper support is not given to our staff, partners and confidence in the City of London Corporation and the City of London is damaged.	 Likelihood Impact	16	As the UK has now moved into the delay phase of the Government's COVID-19 action plan the planning assumption is that COVID-19 will become widespread. It is highly likely that reduces in staff availability could affect the City Corporation's services as will the impact and implementation of Government advice. 26 Mar 2020	 Likelihood Impact	8	Ongoing until clearer evidence virus effect is lessening.	 Constant

Action no, Title,	Action description	Latest Note		Action owner	Latest Note Date	Due Date
CR34a Plan review and updating	Review and revising emergency and business continuity plans	Plans have been and continue to be reviewed with a concentration on identifying and supporting critical services, as well as BAU as best we can in this very fluid situation. They are now being further stress-tested to ensure they are fit for a higher end assumption of		Gary Locker	26-Mar-2020	27-Mar-2020

APPENDIX 1

		<p>staff absence caused by sickness and caring responsibilities.</p> <p>The pan London business continuity plans are also embedded and linked to the London Local Authority Co-ordination Centre LLACC and London local Authority Gold LLAG.</p> <p>All department plans being reviewed and are implemented, currently critical services are being delivered as normal at present. There is no end date so fluidity in planning continues, with daily reviews.</p>			
CR34b Command and Control	Establishment of Gold and Silver command and communication structure within the CoLC	<p>Complete. A Gold Group has been established with a nominated Gold Commander and resilience. This met for the first time on 10/3/20. A Gold Strategy has been approved and continues to be reviewed.</p> <p>Corporate Risk Strategy in place, that is fed by the Silver local risk strategies.</p>	Peter Lisley	23-Mar-2020	13-Mar-2020
CR34c Tactical planning	Prepare and implement tactical plans that will be deployed based upon the continuing /evolving situation.	<p>Complete- Silver Groups have been established under the Gold group and silver leads are developing their tactical plans to deliver against the strategy. All Silver Groups have met at least once.</p> <p>Silver activities are being continual reviewed through the Gold Group.</p>	Peter Lisley	23-Mar-2020	20-Mar-2020
CR34d Localities	Prepare and implement tactical plans to ensure the ability of CoLC to deal with excess deaths caused by Covid 19, including emergency mortuaries and the coronial service.	<p>Bronze Group has been established under the Gold group and silver leads who are developing their tactical plans to deliver against the strategy.</p> <p>This will also run parallel with the London Plan for accelerated and excess deaths group.</p> <p>There is now an excess death multi agency working group, that covers both City and Pan London work. Both COL and COLP sit on both.</p> <p>COL has agreed and offered the Market site at Barking and Dagenham to the pan London work streams for emergency mortuary site if needed. At this time, it is not being utilised.</p> <p>There is current dialogue around Manor Flats land, in London Borough of Newham owned by COL. This is intended to be utilised for the temporary mortuary, being directly opposite Epping Crematorium. Proximity to the mass hospital being created at the Excel Centre.</p>	Jon Avern	26-Mar-2020	27-Mar-2020
CR34e Technology - solutions	Prepare and deploy, upgraded technology solutions and IT support including additional laptops for staff as required	<p>IT Division is collating data for both COL and COLP staff who do not have Corporate Laptops, prioritisation is in place where this may be required.</p> <p>There is an IT plan to procure additional engineering resource required to build and deploy these laptops over 2-3 weeks. Additional resource is on board, with more to come for COLP, subject to expedited clearance (in progress.)</p> <p>IT technical support for home workers and critical staff resilience in place.</p>	Matt Gosden	26-Mar-2020	27-Mar-2020

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		<p>Significant shortage of Power supplies for laptops due to supply chain issues and staff historically not returning them. Plans to address are being developed. Issue closed.</p> <p>COLP IT systems are not coping with working from home and firewall. This is being worked on, considering repair current system or replace new system.</p>			
CR34f Communication	Prepare and implement effective regular staff and member situational awareness and communications.	<p>Director of Communications has implemented effective communication strategies and is coordinating external and internal communications.</p> <p>The audience being, Staff, Members, Residents, visitors, stakeholders across the political and financial city footprint.</p> <p>There is a clear Bronze structure in place behind this.</p> <p>Gold provides daily Chief Officer briefing notes.</p> <p>There is a COVID 19 Sounding group of members and there is a briefing to members planned for Friday 27th March 2020, including Gold, chair of Policy and Lord Mayor.</p>	Bob Roberts	26-Mar-2020	27-Mar-2020
CR34g Financial impact audit	Ensure accurate audit of the financial impact of the COVID-19	<p>Assistant Director of Economic Development has implemented effective command and control across the COL portfolios.</p> <p>There is a clear Bronze structure in place.</p> <p>Financial impact considering current actuals and future impacts.</p> <p>Actual include investment and revenue, covering, rentals of Investment property and Barbican. Department of Built Environment enforcement and charges, Lord Mayors, Mansion House and Remembrancers, hosted and city events as well as Business usage. Commodities, Services and Products, as well as tourist and visitor attractions.</p>	Giles French	26-Mar-2020	27-Mar-2020
CR34h Safeguarding of property during shutdown	<p>Assistant Director of Facilities Management has implemented effective command and control across the COL portfolios, feeding into Silver Public Services</p> <p>There is a clear Bronze structure in place, covering Security, Fire, FM.</p> <p>As the City of London is rapidly, changing to a working from home, work force. Our buildings become, locked down or reduced capacity. As such this is now a new Silver command.</p>	<p>Assistant Director of Facilities Management has implemented effective command and control across the COL portfolios, feeding into Silver Public Services.</p> <p>There is a clear Bronze structure in place, covering Security, Fire, FM.</p> <p>As the City of London is rapidly, changing to a working from home, work force. Our buildings become, locked down or reduced capacity. As such this is now a new Silver command.</p> <p>Focus of work on Business Continuity FM. Statutory Building requirements.as buildings close and ability to meet statutory requirements as we reopen.</p> <p>Contingencies relating to decontamination if required</p>	Alison Bunn	26-Mar-2020	27-Mar-2020

APPENDIX 1

	Focus of work on Business Continuity FM. Statutory Building requirements.as buildings close and ability to meet statutory requirements as we reopen. Contingencies relating to decontamination if required.				
CR34i Supporting critical workers	As pressures build on partners, with reductions on public transport, we are providing free parking across our estate to priority partners. For example, 100 spaces across our estate for NHS at Barts Hospital.	As pressures build on partners, with reductions on public transport, we are providing free parking across our estate to priority partners. For example, 100 spaces across our estate for NHS at Barts Hospital. This ongoing work will feed into Silver public Services. There is now agreed prioritisation of key workers, for example blue light services, social care with support to city business where possible.	Kay English	26-Mar-2020	27-Mar-2020
CR34k Shield Plan	Prepare and implement contingency plans for the 'shield plan', for vulnerable residents	As vulnerable residents receive their letters advising on 12 week self-isolation. The Government is looking to provide food parcels to those who need them, with local authorities tasked to implement. Guildhall is being set up as a hub for the delivery of the first wave of ambient food support, so that distribution can be done across the city.	Andrew Carter	26-Mar-2020	27-Mar-2020

Committee(s): Audit and Risk Management Committee – For decision	Date(s): 31/03/2020
Subject: Internal Audit Charter	Public
Report of: Head of Audit and Risk Management	For Decision
Report author: Matt Lock, Head of Audit and Risk Management	

Summary

Under the Public Sector Internal Audit Standards (PSIAS), all internal audit services operating within the public sector are required to produce an Internal Audit Charter. This Charter sets out the purpose, authority and responsibility of the organisation's Internal Audit function, in accordance with the UK Public Sector Internal Audit Standards (2017) and the CIPFA Local Government Application Note (LGAN).

The Charter is reviewed annually and presented to the Audit and Risk Management Committee for approval, this year's review has resulted no material amendments.

Recommendation(s)

Members are asked to approve the updated City of London Internal Audit Charter 2019.

Main Report

Background

1. The Public Sector Internal Audit Standards (PSIAS) require all Internal Audit services operating within the public sector to produce an Internal Audit Charter. The Charter should be reviewed annually and presented to the Audit and Risk Management Committee for approval.

Current Position

2. The Internal Audit Charter has been reviewed against the criteria specified in the latest version of the PSIAS and current operational practice. The review resulted in a small number of minor amendments and some presentational improvements. A marked-up copy of the Internal Audit Charter is included as Appendix 1 to this report, the changes made are summarised as follows:

- Updated reference to the 2017 Public Sector Internal Audit Standards
- Removal of reference to Business Support Director – post deleted 2015

- Removal of reference to the Internal Audit Strategy as no separate document exists, resourcing now covered in an inserted paragraph
- Capitalisation of titles throughout
- Updates to reflect current terminology (e.g. Corporate Risk Register rather than Strategic Risk Register)
- Replaced “&” with “and” to ensure consistency
- Approval and review date updated

Conclusion

3. The Internal Audit Charter has been reviewed in accordance with the PSIAS. The review resulted in no material amendments, the Charter is now presented to Members for approval.

Appendices

- Appendix 1 – Internal Audit Charter (with tracked changes)

Matt Lock

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CITY OF LONDON CORPORATION INTERNAL AUDIT Audit Charter

1. This Charter sets out the purpose, authority, and responsibility of the City Corporation's Internal Audit function, in accordance with the UK Public Sector Internal Audit Standards (2016~~7~~) and the CIPFA Local Government Application Note (LGAN).

The Charter will be reviewed annually and presented to the Audit and Risk Management Committee for approval.

The Internal Audit, Risk Management and Anti-Fraud functions at the City of London Corporation are provided to a number of bodies, including the City of London Police, the Barbican Centre, the Guildhall School of Music and Drama, and the City Corporation's Independent Schools. Where reference is made to the City Corporation, these bodies will be deemed to be included in the objectives and requirements of this Charter.

Internal Audit Standards

2. Public Sector Internal Audit Standards (PSIAS), which came into effect on 1 April 2013 and most recently revised in 20162017 are mandatory and underpin the Internal Audit arrangements within the City of London Corporation. These requirements include the definition of internal auditing, Code of Ethics and the Standards themselves. The Head of Audit and Risk Management will report on conformance with the PSIAS in his annual report. An independent peer review will be undertaken at least every five years to assess the ~~i~~Internal ~~a~~Audit function's compliance with these standards.

Definition of Internal Audit

3. The ~~Public Sector Internal Audit Standard~~PSIAS mandatory definition of internal auditing, as specified by the Institute of Internal Auditors' International Professional Practices Framework (IPPF), has been adopted by the City of London Corporation as follows:

"Internal auditing is an independent, objective assurance and consulting (advisory) activity designed to add value and improve an organisation's operations. It helps the organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes."

Mission and Core Principles

4. The IPPF's overarching "Mission" for Internal Audit ~~services~~ is:

~~...t~~To enhance and protect organisational value by providing risk-based and objective assurance, advice and insight"

The “Core Principles” that underpin delivery of the IPPF mission require internal audit functions to:

- Demonstrate integrity;
- Be objective and free from undue influence (independent);
- Align with the strategies, objectives and risks of the organisation;
- Be appropriately positioned and adequately resourced;
- Demonstrate quality and continuous improvement;
- Communicate effectively;
- Provide risk-based assurance;
- Be insightful, proactive, and future-focused; and
- Promote organisational improvement.

Authority

5. The Internal Audit function has unrestricted access to all Corporation records and information, both manual and computerised, cash, stores and other Corporation property or assets it considers necessary to fulfil its responsibilities. Audit may enter Corporation property and has unrestricted access to all locations and officers where necessary on demand and without prior notice. Right of access to other bodies funded by the Corporation should be set out in the conditions of funding.
6. The Internal Audit function will consider all requests from the external auditors for access to any information, files or working papers obtained or prepared during audit work that has been finalised, which External Audit would need to discharge their responsibilities.

Responsibility and Accountability

7. Within the City of London Corporation, the Audit and Risk Management Committee will fulfil the functions of the “board”, as defined in the Public Sector Internal Audit Standard with the following exceptions:
 - approving decisions regarding the appointment and removal of the Head of Audit, and
 - approving the Internal Audit budget and resource plan.
8. The Chamberlain as Section 151 Officer is responsible under statute for the proper administration of the financial affairs of the City of London including compliance with the statutory requirements for accounting and internal audit.

The CIPFA Statement on the Role of the Chief Financial Officer in Local Government states that the Chief Finance Officer must:

- ensure an effective internal audit function is resourced and maintained;
- ensure that the authority has put in place effective arrangements for internal audit of the control environment;
- support the authority’s internal audit arrangements; and

- ensure that the ~~A~~udit ~~e~~Committee receives the necessary advice and information, so that both functions can operate effectively.
9. The Head of Audit and Risk Management is the person designated by the Corporation to fulfil the role of the Chief Audit Executive (as required by the PSIAS) and is required to provide an annual opinion to the Corporation and to the Chamberlain (Chief Financial Officer), through the Audit and Risk Management Committee, on the adequacy and effectiveness of the internal control system for the whole Corporation and not limited to financial controls. In order to achieve this, the Internal Audit function has the following objectives:
- Provide a quality, independent and objective audit service that effectively meets the Corporation's needs, adds value, improves operations and helps protect public resources;
 - Provide assurance to management that the Corporation's operations are being conducted in accordance with external regulations, legislation, internal policies and procedures;
 - Provide a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, internal control and governance processes;
 - Provide assurance that significant risks to the Corporation's objectives are being managed. This is achieved by annually assessing the adequacy and effectiveness of the risk management process;
 - Provide advice and support to management to enable an effective control environment to be maintained;
 - Promote an anti-fraud, anti-bribery and anti-corruption culture within the Corporation to aid the prevention and detection of fraud. To achieve this, all Corporation workers have a responsibility to notify the Head of Audit ~~&~~and Risk Management of all instances of suspected and detected fraud or impropriety as this may inform the annual Head of Internal Audit Opinion and the Internal Audit Plan
 - Investigate allegations of fraud, bribery and corruption.
10. Even sound systems of internal control can only provide reasonable and not absolute, assurance, and may not prevent collusive fraud. Internal Audit procedures are designed to focus on areas identified by the organisation as being of greatest risk and significance and rely on management to provide full access to accounting records and transactions for the purposes of audit work and to ensure the authenticity of these documents.
11. The remit of Internal Audit covers the entire control environment of the Organisation. Where appropriate, Internal Audit will undertake audit or consulting work for the benefit of the Corporation in organisations wholly or partly owned by the Corporation. Internal Audit may also provide assurance to the Corporation on third party operations (such as contractors and partners) where this has been provided for as part of the contract.

Reporting

12. The UK PSIAS requires the Head of Audit and Risk Management to report at the top of the organisation and this is done in the following ways:

- The Internal Audit ~~Strategy and~~ Charter and any amendments to ~~them~~ this are reported to the Audit and Risk Management Committee.
- The annual Internal Audit Plan is compiled by the Head of Audit and Risk Management, taking account of the Corporation's risk framework and after input from members of the Senior Management. It is then presented to the Audit and Risk Management Committee annually for noting and comment.
- The adequacy, or otherwise, of the level of ~~i~~Internal ~~a~~Audit resources, as determined by the Head of Audit and Risk Management, and the independence of ~~i~~Internal ~~a~~Audit will be reported annually to the Audit and Risk Management Committee. ~~The approach to providing resource is set out in the Internal Audit Strategy.~~
- Performance against the Internal Audit Plan and any significant risk exposures and control issues arising from audit work are reported to the Audit and Risk Management Committee on a quarterly basis.
- Any significant consulting activity not already included in the audit plan and which might affect the level of assurance work undertaken will be reported to the Audit and Risk Management Committee.
- Results from ~~i~~Internal ~~a~~Audit's Quality Assurance and Improvement Programme will be reported to the Audit and Risk Management Committee.
- Any instances of non-conformance with the PSIAS must be reported to the Audit and ~~Governance Risk Management~~ Committee, and will be included in the annual report from the Head of Audit and Risk Management. If there is significant non-conformance this may be included in the Corporation's Annual Governance Statement.

Independence

13. The Head of Audit and Risk Management has free and unfettered access to the following:

- The Chief Financial Officer (Chamberlain);
- Chief Executive (Town Clerk);
- Chairman of the Audit and Risk Management Committee, together with the Chairmen of the Audit ~~and~~ Risk Management Committees (or equivalent) for those bodies under the remit of the Corporation;
- The Monitoring Officer, ~~and~~
- Any other member of the Chief Officers Group.

14. Although line-managed by the Chamberlain, the Head of Audit and Risk Management has direct access to the Town Clerk, Comptroller and City Solicitor, and the Audit and Risk Management Committee Chairman. ~~Additional professional and managerial support is provided by the Chamberlain's Business Support Director.~~

15. In addition to reporting formally to ~~m~~Members at Audit and Risk Management Committee meetings, the Head of Audit ~~&~~ and Risk Management has access to all ~~M~~members of City of London Committees in the reporting and discussion of ~~i~~Internal ~~a~~Audit work and will meet quarterly with the Chairman and Deputy Chairmen of the Audit ~~&~~ and Risk Management Committee.

16. The Chamberlain, as line manager for the Head of Audit & Risk Management, is responsible for undertaking the performance appraisal of the Head of Audit. The independence of the Head of Audit and Risk Management is safeguarded by ensuring that those subject to audit do not inappropriately influence the annual appraisal of the post holder. This PSIAS requirement will be achieved through the Town Clerk contributing feedback to the performance appraisal of the Head of Audit and Risk Management and that feedback is also sought from the Chairman of the Audit and Risk Management Committee.
17. The Audit and Risk Management Committee would be consulted through the Chairman of the Committee in the appointment and removal of the Head of Audit and Risk Management. The Internal Audit section budget is approved as part of the Finance Committee's consideration of the overall Chamberlain's Departmental Budget. The Audit and Risk Management Committee is provided regular updates on the availability and utilisation of Internal Audit resources and seeks assurances as to their adequacy.
18. All Corporation and contractor staff in the Internal Audit, Risk Management and Anti-Fraud team are required to make an annual declaration of interest to ensure that auditors' objectivity is not impaired and that any potential conflicts of interest are appropriately managed.
19. In addition, both the City Corporation and the Audit contractor staff have stringent procedures in place relating to the acceptance of gifts and hospitality and the prevention of bribery.

Provision of Consultancy through Advice and Guidance

20. The Team provides advice and guidance to management on governance, risk and control. In particular, it may engages with the City's Corporate and Departmental change projects providing expert independent and objective advice on the design of internal controls. The extent and nature of this involvement is controlled, so that the independence of future Internal Audit assurance work is not compromised. The extent of Internal Audit advice and guidance is specified within the forward audit plans of the section, which are agreed annually by the Audit and Risk Management Committee. Any significant variations to this activity will be reported to the Audit and Risk Management Committee for agreement.

Provision of Assurance to outside Bodies

21. The City of London Corporation Internal Audit function provides Internal Audit services under a service level agreement to London Councils and the Museum of London. Both these organisations utilise other City of London Corporation services in addition to the Internal Audit function (e.g. payroll). As part of providing an efficient Internal Audit service to these bodies, Internal Audit may report on the outcomes of audit work on City of London Corporation systems utilised by those outside bodies, once findings and outcomes have been agreed with the relevant Chief Officer. In addition, Internal Audit will occasionally provide assurance to Central Government on the appropriate use of ring-fenced grants or performance returns where required by grant conditions.

Resourcing

22. The Internal Audit resource requirement is met through a combination of directly employed staff and a flexible co-sourcing arrangement with a third-party provider. The co-sourcing arrangement enables the Head of Audit and Risk Management to draw in more specialist skills and experience and to vary the overall level of Internal Audit resource to meet requirements within each year, subject to budgetary constraints.

Non-Audit Areas:

22.23. The Internal Audit Section is also responsible for the following non-audit areas:

Risk Management - Providing risk management support to the City of London by promoting the consistent use of risk management and ownership of risk at all levels within the City. This will be achieved through the development and review of the risk management framework, including facilitation of the City of London Strategic Corporate Risk Register.

Fraud and Corruption - Promoting fraud awareness and maintaining an effective anti-fraud and corruption function, acting as a central function for the investigation of irregularities and, where criminal investigation is considered appropriate, to liaise directly with the Police and advise departments on such matters. The Section plays a specific anti-fraud and investigation role in relation to Housing Tenancy Fraud and the investigation of serious whistleblowing concerns raised through the City of London Whistleblowing policy.

23.24. Where the Head of Audit and Risk Management has non-audit responsibilities, independent assurance as to the adequacy and effectiveness of these arrangements will be provided to senior management and the Audit ~~& and~~ Risk Management Committee through periodic external assessment. The findings from these assessments will be reported independently of the Head of Audit and Risk Management to the ~~Business Support Director and~~ Chamberlain initially prior to reporting to Committee.

24.25. Internal audit procedures prohibits ~~Internal~~ ~~a~~Auditors from assessing specific operations for which they were previously responsible. Objectivity is presumed to be impaired if an ~~Internal~~ ~~a~~Auditor provides assurance services for an activity for which the ~~Internal~~ ~~a~~Auditor had responsibility within the previous year.

Due Professional Care

25.26. The Internal Audit function is bound by the following standards:

- Chartered Institute of Internal Auditor's International Code of Ethics and the core principles for ~~Internal~~ ~~a~~Audit;

- The relevant Codes of Ethics for the professional bodies that members of the Internal ~~a~~Audit service are members of (i.e. the Chartered Institute of Internal Auditors and the accountancy professions that constitute the CCAB);
- Seven Principles of Public Life (Nolan Principles);
- UK Public Sector Internal Audit Standards;
- The CIPFA Local Government Application Note (LGAN);
- All Corporation Policies and Procedures;
- All relevant legislation.

~~26.~~27. Internal Audit is subject to a Quality Assurance and Improvement Programme that covers all aspects of ~~i~~Internal ~~a~~Audit activity. This consists of an annual self-assessment of the service and its compliance with the UK PSIAS; ongoing performance monitoring; and an external assessment at least once every five years by a suitably qualified, independent assessor.

~~27.~~28. A programme of Continuous Professional Development (CPD) is maintained for all staff working on audit engagements to ensure that auditors maintain and enhance their knowledge, skills and audit competencies. The Head of Audit and Risk Management is required to hold a relevant professional qualification (CCAB or CMIIA) or be suitably experienced. The Head of Audit and Risk Management will ensure that the ~~i~~Internal ~~a~~Audit service has access to an appropriate range of knowledge, skills, personal attributes, qualifications, experience and competencies required to perform and deliver its responsibilities.

Approved by the Audit and Risk Management Committee on ~~7~~31 March 20~~19~~20.
Due for revision and annual approval March 202~~1~~0.

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Committee(s) General Purposes Committee of Aldermen Court of Aldermen	Date(s): <i>To be submitted to meetings of the General Purposes Committee of Aldermen and the Court of Aldermen on dates TBC</i>
Subject: Report of Action Taken: Waiver for Livery Companies and Guilds – 5 April 2020	Public
Report of: Town Clerk	For Information
Report author: Lorraine Brook, Town Clerk's Department	

Summary

This report advises Members of action taken by the Town Clerk, in consultation with the Chairman of the General Purposes Committee of Aldermen and the Chairman of the Court of Aldermen, in accordance with Standing Order No. 36 (Court of Aldermen).

Recommendation: That Members note the report.

Main Report

Urgent Decision – Waiver for Liveries and Guilds during COVID-19

Background

- (i) In light of the situation arising from COVID-19, and in an effort to reduce the transmission of COVID-19, the Government has issued guidance in respect of social distancing, attendance at social gatherings and general advice for persons, as far as possible, to remain at home and avoid any face-to-face interactions with any persons outside of the family home.
- (ii) Ordinarily, the general expectation of the Court of Aldermen, as outlined in the guidance issued on the formation of new guilds or companies, would be that all Guild or Company business should be conducted within the City boundaries. However, given the Government's advice on social distancing, a number of Livery Company and Guild clerks have sought guidance from the Clerk of the Chamberlain's Court about how to conduct Company business, including court meetings and the binding of apprentices, in the present extraordinary circumstances. Specifically, guidance was sought as to whether business conducted virtually would be considered valid.

- (iii) In response, the City Remembrancer researched the Court of Aldermen's powers in respect of being able to issue such a waiver and the assessment confirmed that the Court of Aldermen could allow Livery Companies and Guilds to proceed in a different manner on a temporary basis, until such time that the COVID-19 crisis is over.

Reason for Urgency

- (iv) In light of the situation arising from COVID-19 the special meetings of the General Purposes Committee of Aldermen and the Court of Aldermen, which were scheduled to take place on 2 April 2020, were cancelled. Therefore, in response to the large number of queries that were received about the possibility of a waiver being introduced by the Court of Aldermen to allow Livery Companies and Guilds to continue with their day-to-day operation in other ways (i.e. virtually or on a postponed basis for ceremonies) until such time that the COVID-19 crisis was over, the matter was formally considered in accordance with Standing Order No.36 on 5 April 2020.
- (v) The formal approval process followed an informal discussion by the Court of Aldermen at a virtual (informal meeting) on 2 April 2020, at which there was unanimous support for the introduction of the waiver.

Action Taken

- (vi) On 5 April 2020, following consultation with the Chairman of the General Purposes Committee of Aldermen and the Chairman of the Court of Aldermen, the Town Clerk approved the introduction of a waiver in respect of the conduct of Livery Company and Guild practices (which would usually take place within City boundaries) and instructed that the following guidance be made available to Livery Companies and Guilds.

Guidance to Livery Companies and Guilds in light of COVID-19

In light of the current unprecedented situation in relation to COVID-19, the General Purposes Committee of Aldermen and the Court of Aldermen have agreed new guidance to Livery Companies and Guilds. The guidance has received input from The City Remembrancer and has been agreed by the Town Clerk under established urgency procedures.

The Court of Aldermen, being mindful that that the current unprecedented situation imposes restrictions upon the decision-making processes of a number of Companies (With or Without Livery) and Guilds, has agreed, as of 5 April 2020, to allow reasonable variation to the provisions contained in the Ordinances or By-Laws of such Companies or Guilds. The variation will be determined by the Company or Guild concerned and valid only during the period of restrictions on meetings in person applied by the Government.

The clerks of guilds and livery companies who enquire about the conduct of their business during the current extraordinary circumstances are advised:

- That, insofar as the Ordinances or By-Laws of any Company with Livery, Company without Livery or Guild contain restrictive or prescriptive provisions as to the location and timing of any meeting, election, installation or admission of any members or officers, the Court of Aldermen agrees to allow any reasonable variation to such provisions, to be determined by the guild or company concerned and to be valid only during the period of restrictions on meetings in person applied by the Government;
- That, owing to these restrictions, arrangements for business to take place virtually will, in consequence, be permissible; and
- That, in particular, procedures adopted on the occasion of the binding of apprentices may be conducted virtually, subject to the requirement for the indentures to be entered as soon as is reasonable practicable (and within 1 year) in the Books of the Chamberlain of London.

Conclusion

- (vii) Members of the General Purposes Committee of Aldermen and the Court of Aldermen are asked to note the action taken in respect of the introduction of a waiver for Livery Companies and Guilds during the COVID-19 outbreak.

Contact:

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Committee:	Date:
Community & Children's Services Committee	31 March 2020
Subject: Report of Action Taken – Decisions taken under Urgency procedures since the last meeting of the Committee	Public
Report of: Town Clerk	For Information
Report author: Julie Mayer, Town Clerk's Department	

Summary

This report advises Members of an urgent decision taken by the Town Clerk, in consultation with the Chairman and Deputy Chairman, since the last meeting of the Committee, in accordance with Standing Order No. 41(a)

Recommendation

Members are asked to note the report.

SUBJECT: Taxicard and Coronavirus / Covid-19

Background:

This urgent decision was taken in respect of a report from London Councils, seeking agreement from participating authorities to authorise a temporary change to the Taxicard Travel Scheme. This would allow vulnerable members of the scheme to use the subsidy to get drivers to pick up and deliver essential supplies, or allow friends and family to travel with the card to do so on their behalf, until 30th August 2020. All scheme members have a qualifying disability and it is likely that many have been required to self-isolate. The Director of Community and Children's Services was consulted on the proposals and content with the recommendations.

Reason for urgency:

The proposed temporary amendment was developed in consultation with the London (Resilience) Strategic Co-ordination Group and Local Authority 'Gold' Group. As part of its initial response to the COVID-19 emergency measures, City of London Corporation Committee meetings were cancelled during April. The decision was presented for consideration under urgency provisions, as there was a need to act swiftly in order to assist our most vulnerable Taxi-card members.

Financial and legal implications

The scheme will be funded from the contribution received from Transport for London, however, participating authorities will be required to fund the cost of the administration of the scheme. London Councils confirmed that robust monitoring arrangements will be put in place, so that if the volume of Taxicard trips accelerate to the extent that participating authorities may need to make additional financial contributions, members would be alerted at the earliest opportunity.

The consent of each participating authority was required, in accordance with their own constitutions and governance frameworks. London Councils considered that such a variation was permissible, both within the current terms of the contract and line with recent Cabinet Office guidelines. The City of London Corporation's City Solicitor was consulted on the report and content with the proposals.

Action Taken:

- a. To Amend the Taxicard scheme as it operates, within the City of London Corporation's Taxicard service, for the collection of groceries and medicines by a driver or a person, nominated by the Taxicard member, without travelling themselves, for a temporary period until the 30th August 2020 (being an initial period of approximately 24 weeks, subject to review); and
- b. To implement the above resolution by completing and returning the notice provided at Appendix 1 to the report, for the amendments to formally take effect and thereby permit London Councils, under its existing delegations, to implement the changes to the service with Taxicard service providers.

Julie Mayer
Committee and Member Services Officer
Town Clerk's Department
Julie.Mayer@cityoflondon.gov.uk

London Councils' Transport and Environment Committee

Taxicard and Coronavirus / Covid-19 Item No: Urgent

Report by: Stephen Boon **Job title:** Chief Contracts Officer
Date: 26 March 2020
Contact Officer: Stephen Boon
Telephone: 020 7934 9951 **Email:** Stephen.boon@londoncouncils.gov.uk

Summary:

Following consultation with the London (Resilience) Strategic Co-ordination Group and Local Authority 'Gold' this report seeks approval to recommend to the participating authorities that they authorise a temporary change to the Taxicard travel scheme until 30th August 2020 (being an initial period of approximately 24 weeks, subject to review) to assist with efforts to get groceries and medicines to shielded and vulnerable Taxicard members affected by social distancing measures introduced to combat Covid-19. The change will permit Taxicard members to use the service without the individuals travelling themselves. This requires each authority to authorise an amendment to its discretionary scheme conditions. As a consequence of these amendments, if approved, London Councils on behalf of the participating authorities under the powers already delegated to the joint committee to manage and administer the Taxicard scheme as stated in the Governing Agreement, will agree relevant variations to the existing contracts with Taxicard service providers.

Recommendations: It is recommended that each participating authority resolves to:

- a. amend the Taxicard scheme as it operates within their area to allow scheme members to use the Taxicard service for the collection of groceries and medicines by a driver or a person nominated by the Taxicard member without travelling themselves for a temporary period until the 30th August 2020 (being an initial period of approximately 24 weeks, subject to review), AND

- b. implement the above resolution by completing and returning the notice provided at Appendix 1, which will be sent to all participating authority Chief Executives following LCTEC's agreement, for the amendments to formally take effect (and thus to permit London Councils under its existing delegations to implement the changes to the service with Taxicard service providers).

Background

1. The Coronavirus / Covid-19 outbreak is leading to significant reductions in use of the Taxicard scheme which operates across all 33 London local authority areas. The London (Resilience) Strategic Co-ordination Group and Local Authority 'Gold' established under the Civil Contingencies Act 2004 are coordinating efforts to address challenges presented by social distancing in response to the measures implemented by HM Government, and has agreed that temporary changes to the Taxicard scheme could be used to help shielded and other vulnerable groups who are Taxicard members to receive supplies of groceries and medicine.

Taxicard

2. The Taxicard scheme provides subsidised taxi journeys to scheme members who must themselves travel in the taxi. All scheme members have a qualifying disability and it is likely that many have been required to self-isolate. The average age of Taxicard members is 74. For these people, obtaining groceries and medicines will be more difficult while social distancing and self-isolation measures are in place.
3. There has been a significant reduction (40%) in the number of Taxicard journeys undertaken since social distancing measures were first introduced. Over the past three days there have been a combined total of 1,000 jobs undertaken. The normal average for three days would be >6,000. Therefore, this week there has been a reduction of 83%.
4. Following consultation with London Resilience partners and after an evaluation of the needs of Taxicard members, London Councils is recommending that the discretionary conditions of the Taxicard scheme are amended to allow members to use the Taxicard scheme for the delivery of vital supplies of food and medicine delivered, without the need to travel themselves. It is proposed that this change is implemented for a temporary period until 30th August 2020 (being an initial period of approximately 24 weeks, subject to review). This is considered to be a proportionate response insofar as the operation of the Taxicard scheme is concerned in response to the needs of Taxicard members and the underlying purpose of the scheme.
5. Allowing this flexibility would mean that Taxicard members can continue using their subsidy entitlements for journeys they are not currently taking but would have otherwise used, whilst achieving the ultimate objective of the scheme, which is to provide a taxi service for disabled Londoners who find it difficult or impossible to use bus, underground or railway services to travel around London or in the vicinity of London in the context of the Government's current social distancing measures. Officers do not consider that this measure will increase the cost of the Taxicard scheme.
6. The Agreement provides *inter alia* that London Councils has the authority to procure Taxicard services from taxi operators to deliver the Taxicard scheme and to manage the day-to-day operation and budget of the scheme so as to comply with eligibility, membership, budgetary provision and trip allocation requirements specified by the participating authorities. No amendments are proposed to these provisions.

Financial Implications for London Councils

7. The Director of Corporate Resources reports that the forecast position for the current financial year (2019/20) for the funding of the Taxicard scheme is that the trips element of the scheme will be funded entirely from the contribution received from TfL.

The participating authorities, therefore, will make no contribution to the costs of Taxicard trips taken by members, but participating authorities will fund the majority of the costs in the current year of London Councils administering the scheme on their behalf.

8. Given that the 2020/21 financial year starts in less than 6 days, officers forecast that the funding pattern experienced in the current year is likely to repeat itself in 2020/21. On the basis of that assumption, officers will need to ensure that robust monitoring arrangements are put in place to ensure that clear evidence exists that this position continues to hold and that the position is reported on a monthly basis. This will ensure that if the volume of Taxicard trips accelerate to the extent that participating authorities may need to resume financial contributions, members can be alerted at the earliest opportunity.

Legal Implications for London Councils

9. The 33 London local authorities participating in the Taxicard scheme have delegated the joint discharge of the functions of the management and administration of the London Taxicard scheme to the LCTEC, which is a joint committee. These functions, and the arrangements for their exercise as jointly agreed by all the authorities, are set out in the LCTEC Governing Agreement, dated 13 December 2001 (as amended). LCTEC has certain general obligations under that Agreement including to act in good faith and in the interests of all authorities collectively.
10. Insofar as Taxicard is concerned, the joint committee is constrained by the terms of the Governing Agreement and is required to act in accordance with the general and discretionary conditions of the scheme which each of the authorities have set. LCTEC has, in administering the scheme, the duty to tender for the Taxicard services and the power to enter into contracts with taxi operators on behalf of the participating authorities for delivery of the scheme. Each participating authority retains the power to set the rules of the scheme, whether general conditions which are common to all the authorities, or discretionary elements for their own local authority area.
11. Thus the joint committee's authority does not extend to varying the general or discretionary conditions and restrictions of the scheme. Currently, there is a general requirement that Taxicard members must be present in the vehicle when a journey is undertaken. The approval being sought is to introduce a temporary additional discretionary permission to allow Taxicard members to use the scheme in the manner outlined above. Therefore, the consent of each participating authority in accordance with their own constitution and governance framework is required, both to amend the discretionary conditions of the scheme as proposed, to give effect to the change.
12. It should be noted that London Councils will have to receive notice from participating authorities that they have agreed the variation to their discretionary conditions, and to expedite this, London Councils recommends that the notice is provided by each authority in the form set out in Appendix 1. This Notice must be received by London Councils from each authority before the change to the scheme can be formally implemented with its own Taxicard members. Subject to LCTEC's agreement, the notice will be sent to each authority Chief Executive. TfL as funder and Taxi operators have agreed to this change.
13. It is noted that having regard to the social and health impacts of undue delay, LCTEC officers will implement the variation on an authority by authority basis where we have received notice of their decision to vary the scheme. London Councils is required to

act in the interests of all the participating authorities, and therefore whilst this action would be taken at risk, should a challenge to this decision arise on the basis that it is in conflict with the general conditions of the scheme, LCTEC officers consider this risk to be low, and the action justified in these extreme circumstances. In taking this decision, regard will be had to (a) the support to the proposed scheme variation provided by the London Resilience Group, TfL as funder of the service, and the taxi operators themselves; (b) the variation being implemented for a proportionate period (which will remain under review); and (c) the significant public interest in prompt action to support these vulnerable individuals.

14. London Councils will put in place a contract variation with its supplier to allow the change to take effect. Officers consider that such a variation is permissible both within the current terms of the contract and is also in line with recent Cabinet Office guidelines issued in *Procurement Policy Note – Responding to Covid-19*.

Equalities Implications for London Councils

None

Recommendations

It is recommended that each participating authority resolves to:

- a. amend the Taxicard scheme as it operates within their area to allow scheme members to use the Taxicard service for the collection of groceries and medicines by a driver or a person nominated by the Taxicard member without travelling themselves for a temporary period until the 30th August 2020 (being an initial period of approximately 24 weeks, subject to review), AND
- b. implement the above resolution by completing and returning the notice provided at Appendix 1, which will be sent to all participating authority Chief Executives following LCTEC's agreement, for the amendments to formally take effect (and thus to permit London Councils under its existing delegations to implement the changes to the service with Taxicard service providers).

Appendix 1 – Notice from Taxicard participating Authority to allow scheme members to use the Taxicard service for the collection of groceries and medicines by a driver or a person nominated by the Taxicard member without travelling themselves for a temporary period until the 30th August 2020 (being an initial period of approximately 24 weeks, subject to review).

To: stephen.boon@londoncouncils

Stephen Boon, Chief Contracts Officer, London Councils

I.....[name and position of authorised person]

on behalf of..... [name of authority]

hereby give notice that my authority has resolved to:

vary the discretionary conditions in the Taxicard scheme as follows:

“For a temporary period until 30th August 2020 (being an initial period of approximately 24 weeks, subject to on-going review, and extended or withdrawn as appropriate) that the discretionary conditions of the Taxicard scheme will be varied to allow Taxicard members to use their Taxicard without travelling themselves. This relaxation will allow:

- a) Taxicard members to nominate someone to travel on their behalf to collect groceries and/or medicine; and/or*
- b) To allow taxi and PHV drivers associated with the scheme to collect pre-ordered groceries and/or medicine on the member’s behalf.”*

Signed

.....

Date

.....

Committee City of London Police Authority Board	Date: Delegated
Subject: City of London Policing Plan 2020-2023 [30 March 2020]	Public
Report of: Town Clerk	Information
Report author: Alistair MacLellan, Town Clerk's Department	

Background

The Police Authority Board considered a draft of the Policing Plan 2020-23 at its January 2020 meeting, with further feedback from Members being invited over email during January and February. The Board then delegated authority to the Town Clerk at its 27 February 2020 meeting to approve the Plan pending any final comments from Members.

The delegation was approved on the proviso that the final draft plan be circulated to the whole Board electronically for final comment in advance of its being submitted to the Town Clerk for approval, which was done on 17 March 2020, with no further comments being received.

Pending approval, the Plan will be published on 1 April 2020 and submitted to the Court of Common Council for information thereafter.

Action Taken

The Town Clerk, in consultation with the Chairman and Deputy Chairman, approved the City of London Policing Plan 2020-2023.

Alistair MacLellan

Town Clerk's Department

Alistair.maclellan@cityoflondon.gov.uk

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Committee Capital Buildings Committee	Date: Delegated
Subject: Funding of Further Works to the General Market [30 March 2020]	Public
Report of: Town Clerk	Information
Report author: Alistair MacLellan, Town Clerk's Department	

Public Summary

MAIN REPORTS NOT FOR PUBLICATION

These reports are exempt by virtue of the paragraphs 3 and 7 of Part 1 of Schedule 12A of the Local Government Act 1972. Specifically, the report contains sensitive information which may be exempted under the Act, and as this cannot be presented to Members as a separate appendix this report needs to be considered in closed session. It is considered that information falling under the following paragraphs outweighs the public interest in disclosing information:

3)	Information relating to the financial or business affairs of any particular person or body (including the authority holding that information).
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Background

Investigations into the General Market building have identified a range of unforeseen works that require an additional budget for delivery. Whilst the budget for the works was approved by the Capital Buildings Committee in December 2019, authority was delegated to the Town Clerk at that meeting to determine how those works should be funded in practice and kept separate from the existing grant funding. This report sets out the review process undertaken by officers, and the recommended option(s).

Action Taken

The Town Clerk, in consultation with the Chairmen and Deputy Chair, approved

- that the further works be procured and undertaken by a named party and funded from within the City's Cash provision for landlord works for the Museum Project; the way in which the works would be procured, identified and managed; and the basis on which the grant be paid.

Alistair MacLellan

Town Clerk's Department

Alistair.maclellan@cityoflondon.gov.uk

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