



## Local Plans Sub (Planning and Transportation) Committee

**Date:** WEDNESDAY, 4 NOVEMBER 2020

**Time:** 1.45 pm

**Venue:** VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

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

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<https://youtu.be/ieqhPtUG2fE>

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**John Barradell**  
Town Clerk and Chief Executive

# AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes of the meeting held virtually on 20 October 2020.

**For Decision**  
(Pages 1 - 12)

4. **CITY PLAN 2036: REVISIONS TO PRE-SUBMISSION DRAFT PLAN**

Report of the Director of the Built Environment

**For Decision**  
(Pages 13 - 30)

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

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

## LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE Tuesday, 20 October 2020

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)  
Committee held at on Tuesday, 20 October 2020 at 1.45 pm

### Present

#### Members:

Deputy Alastair Moss (Chair)  
Oliver Sells QC (Deputy Chairman)  
Randall Anderson  
Christopher Hill  
Deputy Jamie Ingham Clark  
Shravan Joshi  
Graham Packham  
William Upton QC

#### Officers:

|                     |                                       |
|---------------------|---------------------------------------|
| Gemma Stokley       | - Town Clerk's Department             |
| Christopher Rumbles | - Town Clerk's Department             |
| Sarah Phillips      | - Town Clerk's Department             |
| Shani Annand-Baron  | - Media Officer                       |
| Ellen Wentworth     | - Technology Support Officer          |
| Paul Beckett        | - Department of the Built Environment |
| Adrian Roche        | - Department of the Built Environment |
| Peter Shadbolt      | - Department of the Built Environment |
| John Harte          | - Department of the Built Environment |
| Janet Laban         | - Department of the Built Environment |
| Sunita Burke        | - Department of the Built Environment |

#### Introductions

The Town Clerk opened the meeting by introducing herself and stating that the Committee was quorate.

A roll call of Members present was undertaken.

The Town Clerk highlighted that the meeting was being recorded as well as live streamed and would be made available on the City Corporation's YouTube page for a period of time after the meeting had concluded. With this in mind, it was confirmed that participants in the meeting had all individually agreed and given their consent to being recorded and that all personal data would be processed in accordance with the Data Protection Act 2018. The Town Clerk highlighted that, for further information on this, viewers could contact the City Corporation using the details provided on the public webpages.

#### 1. **APOLOGIES**

Apologies for absence were received from Deputy Keith Bottomley.

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

There were no declarations.

3. **MINUTES**

The Sub-Committee considered the public minutes of the last meeting held on 10 February 2020 and approved them as a correct record.

4. **CITY PLAN 2036: REVISIONS TO PRE-SUBMISSION DRAFT PLAN**

The Sub-Committee considered a report of the Director of the Built Environment setting out revisions to the City Plan 2036 that were now required prior to consultation to address revisions to permitted development rights and the Use Classes Order which came into effect on 31 August 2020 and 1 September 2020; to acknowledge the short-term impacts of the Covid-19 pandemic, whilst emphasising that the medium to longer term fundamentals underpinning the City's economic success remain in place; to update the Plan to reflect the City's climate ambitions in the newly adopted Climate Action Strategy and to make minor factual updates.

Officers explained that the original intention had been for the February 2020 meeting of this Sub-Committee to oversee final adjustments to the Plan prior to its submission to the Planning and Transportation Committee and the Court of Common Council and then its publication for consultation during Summer 2020. Whilst the proposed submission Plan had been approved by the Planning and Transportation Committee and the Court of Common Council in May 2020, things were not able to progress beyond this stage as the Government had not yet changed the planning regulations to reflect the impact of COVID-19 and physical consultation on the Plan was also not possible during the height of the pandemic. As a result, this process had been delayed until Autumn 2020, at which point, the Government did announce changes to the rules such that the Plan could now go forward for consultation virtually. It was now envisaged that any further changes to the Plan agreed by this Sub Committee the Planning Committee and the Policy Committee in the coming months would go before the Court for consideration once more in January 2021 prior to consultation and, eventually, submission in Spring 2021.

A Member spoke to question whether the timing proposed would be quick enough or whether it was possible that the new legislation to implement planning reforms would be brought in before the City had concluded this process meaning that all of the work undertaken would not be worthwhile. Officers responded to state that they felt that this was unlikely as the significant changes proposed would require primary legislation. In the meantime, Officers understood that there would be transitional arrangements in place to enable those Plans that were already in train and sufficiently far advanced to continue to progress and be finalised. It was felt that the City's Plan would be able to benefit from such arrangements if Members felt that this was appropriate. Finally, Officers reported that the new MHCLG Chief Planner had very recently advised local authorities to press on with their Plans and not to treat the current uncertainties surrounding the wider planning policy context or COVID as a reason not to progress plans for the medium to longer-term.

The Member came back to question whether the internal approval of the Plan might be fast tracked by using urgency provisions meaning that it could be considered by the Court of Common Council in December 2020 as opposed to January 2021. Officers undertook to look into this possibility.

With regard to the primary legislation around the new planning regime, a Member questioned whether Officers had any insight as to when it was likely to come forward and also as to whether this would require the City Corporation to produce a Design Code. Officers reported that primary legislation was likely to come forward in 2021. They reminded Members that a Planning White Paper had already been published for consultation and that this contained various proposals which involved different mechanisms for preparing Plans and what these should contain. If this should be approved, it would clearly also have an effect in the longer term. Officers went on to comment that there was mention of things such as Design Codes within the White Paper and, should these become a requirement going forward, this would need to be discussed by Members at the appropriate time. It should not, however, be a distraction in terms of the content of the existing Plan which was intended to look forward, in a positive way, over the next 15 years, at the re-emergence of the City as a major commercial centre after the current pandemic had passed.

Members were informed that all of the proposed changes were set out within Appendix 1 to the report alongside a justification for each. When the Plan had last been considered, in early 2020, Officers had been of the view that it was sufficiently flexible and robust to accommodate reasonable unexpected occurrences and they now felt that the COVID-19 pandemic had demonstrated how sound this thinking was. It was felt that the Plan was still, fundamentally, sound and pointed the City in the right direction and would bring with it beneficial change over the next 15 years. For this reason, the Sub-Committee were asked to review the proposed Schedule of Changes only and not the entirety of the Plan once more.

Officers went on to address each of the four key drivers that were behind the newly proposed revisions to the Plan. The first of these were changes to planning law which had already happened with the most directly relevant of these to this organisation being changes to the Use Classes Order which came into effect on 1 September 2020 and changed the categorisation of some of the land uses in the City and influenced what it was possible to do with certain sites without needing specific planning permission. The Government's rationale for this was to 'free-up' control over land uses within town centres to generate greater flexibility and help stimulate the economy, future growth and the vitality of town centres going forward. With this in mind, a new Use Class – 'Class E' – had been created which incorporates offices, retail and some other uses. A consequence of this was that the Plan would need to be adapted to reflect this. In this respect, there were sections of the schedule of changes which related to office uses and how this ought to be treated going forward and other sections relating to retail uses and how this ought to be handled. As this was quite a significant change, it had led to a number of proposed revisions as set out within Appendix 1.

The second driver of change was the ongoing COVID pandemic. Officers stressed that it was, nevertheless, vital for the City Corporation to continue to look forwards over the next 15 years when deliberating the content of the Plan.

A Member agreed that it was important to try not to predict what the City might look like in the shorter term as it emerged from the pandemic. Having said that, he stated that he felt that there were two quite clear impacts of the current situation – its impact on the City’s finances and also on TfL’s finances – both of which would have a short-term or perhaps even a reasonably medium-term impact on the pace of implementation of this Plan and should therefore be factored in. He reiterated that the longer-term picture was unpredictable and that it was important to be sufficiently flexible and revisit the Plan or specific elements of it on a regular basis. Officers responded by reassuring Members that the Plans were deliberately drafted to be flexible and adaptable and the Government’s latest planning reform agenda was intended to make it quicker and easier to adapt Plans in the future. It was accepted that the document would not be perfect but it was hoped that if enough of it was as good as it possibly could be, it would give a strong steer to those who wished to be involved in the City and give them confidence to invest in it with parts of the Plan capable of being revised as and when necessary and when new changes and challenges presented themselves.

Another Member made reference to a headline in the Financial Times this morning which had made reference to the City Corporation’s 5-year plan for recovery from the COVID-19 pandemic which was to be published tomorrow. This would suggest that the effects would be felt for much longer than was being suggested here and the Member expressed concerns that the Sub-Committee were considering a Plan where there was no evidence to suggest that the next 5 years were going to be as originally thought in 2019. He highlighted that retail figures were based on a study from 2017 and that he did not feel that the wording of the Plan or this accompanying report made adequate reference to the uncertainties and the evidence that would be needed to justify what the City Corporation wanted to achieve. The Member stated that he would welcome a wider discussion around this at a future meeting of this Sub-Committee and ahead of the submission of a revised Plan to the Court of Common Council in either December 2020 or January 2021.

Officers responded by confirming that they had been involved in the report referred to which had been produced by Wyman and Arup in partnership with the City Corporation and that they had had the opportunity to read and comment upon a draft of this. They felt that many of the things within the report were complementary to the broad thrust of the approach set out within the City Plan. This type of positive engagement with consultants had enabled a better understanding of how COVID was impacting the City at present and how it might continue to do so in the short, medium and longer-term. Officers stated that they thought that the report was a good news story and set out how the City could and should be a positive commercial hub going forward which was entirely in keeping with the Plan.

Another Member spoke to highlight that a lot had been made of the '15-minute City' concept, particularly in Europe. He commented, however, that he did not feel that this was suitable for the Square Mile given its mix of business and residential and suggested that it might be helpful to address the matter at this stage in the Plan to highlight that the concept had at least been considered. Secondly, he agreed with the fact that the report on the City's 5-year plan for recovery did match much of what was included within the Plan and addressed some of the potential risks which may or may not arise. He therefore felt that a similar approach should be taken with this document whereby a vision was clearly set out and risk profiles were built up in more detail so that it could be more closely aligned with what was happening on the ground.

With regard to the concept of the 15 minute City, Officers commented that this was essentially about seeking to make the most of residents living in a particular area, or those living nearby, by encouraging them to engage in that area and thereby contribute to its economic viability. The City's circumstances were slightly different in that it did not have the same level of adjacent residential populations as other areas and where it was more dependent on longer distance commuters. Officers noted that this was not necessarily a bad thing as it meant that the City had access to a very wide regional labour pool and skilled workers/expertise that you would not necessarily enjoy with a 15-minute City model.

It was agreed that it may well be worth providing an explanation of this somewhere within the Plan. With regard to the Plan itself, Officers underlined that they were of the view that there was an obligation on them as planners and also on elected Members to lead and to set out a marker as to what they would like to happen and how they would like that to happen rather than waiting on events. Planning was essentially about positive thinking for the future and not about reactive responses to past or current circumstances. It was acknowledged that, to some extent, setting things out within the Plan as well as within this newly published report involved an element of risk but it was, nevertheless, important to set out these aspirations so that anyone wanting to engage with the City were clear on its standpoint. A Member responded by stating that, if there was evidence to support the fact that the Plan was sound, he was very keen to ensure that this was widely shared and linked into the document itself. He suggested that the wording of the schedule should be revisited now that this report had been publicised to embrace the evidence that was now available as it was clear that reliance on pre-COVID evidence alone was no longer sufficient. Officers assured the Sub-Committee that further work would be undertaken between now and Christmas 2020 to 'sense check' some of the work produced pre-COVID – this would include further work and supplementary reports around areas such as retail where it was clear that behaviours had changed as a consequence of the pandemic and where Officers would want to get a sense of whether their thinking around this pre-COVID remained relevant in current circumstances and going forward. At examination, the Inspector would also expect this to be the case and to see a good evidence base.

The Chair commented at this point to underline that he also felt that it was very important to be forward looking in terms of the Plan and planning in general, working within the market place and providing an evidence base and justification for any aims but also to be saying, through various channels, where, as the local authority for the Square Mile, we see the future of the City.

Officers went on to report that another important driver for change was the City's Climate Action Strategy which had been factored into the Plan in Spring and had now been launched. It was felt that the Strategy was embedded within the Plan and with the publication of more specific aims within the Strategy, it was suggested that the Plan should be factually updated to reflect these. The continued progression of the Plan would also help to bed this into planning policy and generate delivery mechanisms for some of the objectives set out within the Climate Action Strategy.

The final driver for change was reported to be the Planning Inspectorate. Officers reported that in the Summer they had taken advantage of the hiatus in the Plan process to invite a Planning Inspector to view the Plan and provide feedback. As a consequence of this, further revisions to the Plan were now proposed. One example of this was in relation to housing where the Plan process typically assumes that you deliver all of your housing within your local authority area – for the City Corporation, however, this was not necessarily the case as a lot of its housing was provided in other parts of London, beyond the Square Mile. The Planning Inspector felt that where there were difficulties with providing housing in the City itself Officers ought to make a compensatory case stating that this was also provided outside of the City and that this narrative should be elaborated within the Plan to help the reader to understand the wider context.

With regard to the wider planning reform agenda and the issue of speed versus risk, Officers reported that they were of the view that the proposed reform was an attempt by central Government to drive improved performance in local planning authorities, to speed up the process and thereby deliver development in the right places at the right time to a greater extent. Considering the City Plan in this context, Officers felt that if this continued to be taken forward at a reasonable pace they would be in a good position to submit the document in early 2021, embed the various policies and begin to deliver them. Again, there was a degree of risk associated with this approach as it required making certain judgements whilst the picture in relation to COVID remained less than clear. However, it was felt that the benefits of proceeding outweighed the disbenefits. The alternative would be to cease work on the plan for the next 12 months and await further direction from Government. This would mean that the authority's local freedom of action might be drastically reduced and would also suggest to those outside the authority that it had no clear vision in terms of where it wanted to be in the longer-term.

A Member spoke to state that he agreed with the notion that the Plan should continue to be progressed in the coming months. He went on to speak about housing and stated that whilst he was not opposed to adding to the narrative on this in the way that the Planning Inspector had suggested to make reference to



the City Corporation's broader work it should not be expected that this gave the authority any sort of 'pass' on the need to provide more housing in the City. He added that one of the frustrations of central Government was that local authorities were not making sufficient progress on the delivery of housing. Whilst some authorities could point to the fact that they had granted a lot of permissions that were not built, others had made it difficult to gain permission to build housing and he felt that the City fell into the latter category. Fundamentally, he felt that the City Corporation were going to have to have a clear plan as to how housing was to be delivered within the City and not elsewhere, particularly as the Plan would be examined to a background of the Government trying to introduce legislation to increase the building of housing and the fact that the organisation had failed to meet expected targets on this for two consecutive years and were therefore starting on the backfoot. Officers commented that they were certainly not seeking to water down the commitment to delivering housing within the City in the Plan but just to incorporate the suggestion of the Planning Inspector and provide some wider context. Officers added that, perversely, the latest suggested Government methodology would actually give the City Corporation a slightly lower target in terms of housing than it currently had although it was not suggested that this should be adopted.

In terms of pace, a Member commented that he felt that Officers were being given strong support here to press on with the Plan. With regard to housing and perhaps being more explicit in terms of how targets were to be accomplished, he highlighted that, unless the City Corporation were proposing to build these themselves, they would have to rely on developers. What the organisation could do is to help ease the planning process and grant more permissions but, if developers did not then deliver on these, targets would fail to be met. Officers commented that this situation was not unique to the City but added that the Square Mile was an extreme example because of the volatility of the property market in the City. The Plan clearly set out where the City Corporation felt that housing should be within the City and Officers highlighted that the approach to this had been made more flexible compared with the adopted Plan and thereby provides a strong steer to the market on this. The Housing trajectory for the City suggested that targets would be met provided that developers deliver on identified sites in the medium-term. For the longer-term, things were less certain, and it may therefore be that, in subsequent reviews of the plan, Members and Officers look again at if they need to designate further sites within the City for this purpose or something similar. This had not proved to be necessary just yet. The Chair added that different types of delivery had also been considered.

Another Member spoke to refer specifically to Part 6.3.2 of the schedule attached at Appendix 1 regarding Active Travel and Healthy Streets and stressed that he felt that the City had already achieved this in that it had had a motivation to support pedestrianisation for a long time now, pre-COVID and that over 90% of journeys in the City were already made on foot. He was therefore concerned that this appeared to be the inclusion of words from the Mayor of London in the Plan and that this was heavily politicised as was the situation with TfL. He added that the risk of travel into the Square Mile using public transport ought to be reflected on as opposed to travel within the confines of it.

It was essential that public transport was able to deliver people in and out of the Square Mile for the City Corporation to then manage pedestrianisation and active travel within its boundaries. Officers agreed with the point made and the fact that a successful City was not possible without successful infrastructure with public transport being a critical element of this. Officers added that there were unchanged references elsewhere in the Plan to how crucial public transport was in terms of facilitating access to the City and its importance in terms of the City's competitiveness but undertook to look again at how these particular references might also reflect this. The Chair agreed that this would be helpful particularly given that things such as City Airport and the Waterloo and City Line were hot topics at present.

Another Member wished to return to the topic of housing delivery and stated that one of the options considered in March 2020 had been to identify smaller sites outside of the main designated residential areas in the City and present these as options to developers for residential development. He recalled that he had been in the minority in supporting this option but felt that, eventually, it might need to be revisited given that the nature of the City was going to change and a City that was mixed-use was likely to be the end result. Officers reiterated that there were parts of the City that had already been identified as being suitable for residential development without any adverse effects on the commercial City. If smaller sites were then to be identified outside of these areas, it was the view of Officers that this would create added complications that were not currently needed as housing could still be delivered in those areas identified for this purpose. Clearly this approach could be revisited in due course and viewed against performance. It was reported that the Inspector who had reviewed the Plan during the Summer had been generally supportive of the current approach on housing and the justification for this and designated residential areas. The Plan was sufficiently flexible to re-visit this and proposed housing numbers should this prove necessary in future years.

A Member questioned the primacy of housing policy and where this sat in terms of governance given that there were already various statements from the Policy and Resources Committee around the provision of things such as Social Housing. Officers reported that as a local planning authority the City Corporation and its Planning and Transportation Committee were responsible for the mix of land uses within the City and should therefore determine if they felt that housing should be provided in particular parts of the City. Separate to this, although very much inter-related, the Community and Children's Services Committee/Department were responsible for managing stock and may take a different view as to what stock they wished to manage and where they might want to see this provided.

Another Member spoke again to state that he was proposing that wording which made it explicitly clear to the development community and others that housing in or immediately adjacent to a residential area was not unfavourable should be included within the Plan. Officers stated that they would be happy to revisit this to ensure that the wording around this was as clear as possible and that the presumption was in favour of housing delivery in or near identified residential areas. Officers underlined that Policy S3 – Housing – encourages

new housing development on appropriate sites in or near identified residential areas. The Member recognised this but suggested that there was still language within the Plan around office use which would appear to be at odds with this. The Chair interjected to state that policies around the protection of office space in the City would trump the expansion of residential areas. The Member stated that he felt that a more relaxed approach should be taken with regards to development within or immediately adjacent to existing residential areas. Officers stated that they did not feel it was necessary to go so far at present given that there was evidence to suggest that housing delivery already within the pipeline would achieve the necessary targets within the medium-term. Should there be issues in terms of housing delivery in the longer-term, then this may well be an appropriate revision to consider in due course. Officers undertook to revisit the Office Protection Policy to ensure that they were satisfied that it was as clear as possible at this stage.

Another Member suggested that wording around housing delivery needed to be carefully considered as, even some sites adjacent to existing residential developments could have unintended negative consequences if they were to be used for housing. Housing next to licensed premises was a clear issue for example.

A Member commented that whilst there would appear to be broad support on the proposed changes set out within the schedule at Appendix 1, he still felt that there was not enough information on the likely effects of the pandemic on short-term plans over the next 5 years and that more evidence around this should be provided before the Plan was recommended for approval by the Planning Committee, the Policy Committee and the wider Court. Officers reported that this Plan was focused primarily on a post-vaccine era, assuming that there would be a vaccine within the short-term. Whilst it was still expected that this era would differ from the pre-COVID era in terms of behavioural trends, some trends would likely persist just for the duration of the pandemic, some trends that were in decline prior to the pandemic could disappear entirely as a consequence of COVID and other new trends would emerge that would persist longer-term and which would need to be recognised within the document – for example remote working. It was expected that the attraction of central cities would re-emerge in a post-vaccine era given that they offered economies of scale and scope, together with vitality and innovation. There would also, however, undoubtedly be more remote working going forward which would impact upon the number of workers in the City on any particular day but not to the extent that this would dramatically reduce numbers employed in the City overall. With this in mind, it was not believed that the effects of COVID would fundamentally alter the assumptions that underpinned the existing Plan. Officers underlined once more that they were of the view that it was important to move forward with the situation as they currently understood it and to provide leadership in terms of planning. The Member responded to argue that there was currently no evidence to support the statement that had just been made and that the Planning Inspector would be looking for this. The Member added that he would be keen to test the theory presented by Officers over the next 2-3 months before the Plan was finalised. The Chair reported that Officers had made it clear to him and the Deputy Chairman that in terms of national

guidance, the context of the Plan would, to a degree, be set for us. He added that the current situation was unique in terms of assessing the soundness of the Plan and that the test for him was therefore around whether there was evidence to suggest that the aims and aspirations within the Plan were either unrealistic or undeliverable and if there was not then these aims and aspirations should be promoted and pursued. If there was evidence to the contrary, the aims should be revised. In terms of evidence on the current situation, the Chair underlined that the organisation had collected a lot of data around the effects that this was having in the form of the soon to be published Wyman and Arup report amongst other things.

Officers reported that once the Plan was approved by the relevant Committees and the Court in early 2021, it would then be the subject of public consultation ahead of submission in Spring 2021. Should the picture around COVID and its consequences become clearer during this time, the City Corporation could make it clear upon submission that this reflects the view taken six months previously and, whilst it was still felt that the Plan was generally sound, certain policies would now require finessing to demonstrate some flexibility.

Officers went on to highlight that the Plan contained an Office Floor Space target of 2 million square metres growth. They reassured Members that approximately two thirds of this had either already been delivered or was currently under construction.

Another Member commented that, by the time this Plan was submitted in 2021, major occupiers would already have begun to take decisions about how they occupy their space which would, in turn, provide further evidence either in support of or contrary to the aims set out within the document. Anything prior to this would have to be purely speculative. The Member went on to refer specifically to the proposed revisions concerning paragraph 3.4.6 and the Key Areas of Change: Smithfield and Barbican. Here he questioned the proposed removal of the word 'potentially' suggesting that there were likely to be those who would strongly oppose this with regard to the markets consolidation project. Officers reported that this was proposed to reflect the fact that, since the draft Plan had been produced, public consultation had taken place around the consolidation of the wholesale markets and principles around the re-use of Smithfield Market. The Museum of London application had also been approved by the Planning Committee, providing more certainty. The Chair suggested that the wording here might be amended to refer to the re-use of the whole or part of Smithfield Market. Officers undertook to amend this as proposed.

With regard to the wider housing context, the Member referred to the wording of paragraph 4.3.12 on Housing and the aim of delivering at least 700 new homes on City-owned land and housing estates in 2019-23 which he felt was unachievable particularly given that, once work had completed on the two sites that were currently progressing, there had been no budget identified for further works. Officers undertook to revise the wording in this context so that it more accurately reflected the numbers that were likely to be delivered in the short-term.

Another Member wished to focus on retail and Strategic Policy S5 which referenced the principal shopping centres in the City. He went on to state that he had specific concerns around Fleet Street and the viability of this and questioned whether something such as a Local Area Plan might be useful to promote this area. He added that he felt that the success of retail areas was dependent on the mix of retail on offer and questioned the planning authority's ability to influence this, if any. The Member reported that, pre-pandemic, a well-known hardware store on Fleet Street had closed with plans for another sandwich bar to replace this – something that had been met with great disappointment by local residents. Officers responded by reporting that the Use Classes Order changes introduced in September 2020 effectively took away some of the local authority's powers over change of use between different retail uses (A1/A2 and A3 for example). However, even prior to this, there had been no means by which to control which particular shop would operate from a particular retail unit and promote an ironmonger over a sandwich bar for example. On a positive note, Officers reported that earlier this morning they had held a liaison meeting with the Fleet Street Quarter Partnership as part of ongoing engagement with them and that the Partnership was looking to develop from a partnership to a bid status for the area. One of the themes brought forward had been that if all interested landowners in the area could properly engage in the process and agree that it was in the interests of them all for Fleet Street to be a vibrant 'spine' for the whole area, then it might be possible to curate the sort of retail and other uses along Fleet Street that were desired, even in the absence of the previous local authority levers around this. Officers had undertaken to revisit the Fleet Street Key Area of Change wording within the Plan to reflect that partnership, the bid and the aspirations to link the area into other parts of the City. The Chair highlighted that the Deputy Chairman was leading on this work from a planning policy perspective given that his own office was on Fleet Street, with his firm also part of the partnership mentioned, and that he may therefore be potentially conflicted.

The Member also highlighted reference within the Plan to temporary retail pop-ups and underlined that these could sometimes adversely affect local retailers occupying fixed units particularly if were in direct competition with them and had lower overheads. He added that these therefore needed to be managed carefully. Officers accepted the point but highlighted that the thinking behind these references had been an attempt to animate otherwise sterile areas and not to provide direct competition to existing retailers.

Officers thanked the Sub-Committee for a useful steer on the various issues presented and undertook to present some amended proposed revisions to their next meeting on 4 November 2020 alongside further reassurances on and evidence to support the approach being taken during the ongoing pandemic.

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

There were no questions.

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

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

**The meeting ended at 3.06 pm**

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Chairman

**Contact Officer: Gemma Stokley**  
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**[gemma.stokley@cityoflondon.gov.uk](mailto:gemma.stokley@cityoflondon.gov.uk)**

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|---|---------------------|
| <b>Committee(s)</b>   | <b>Dated:</b>       |
| Local Plan Sub-Committee  | 04/11/2020          |
| <b>Subject:</b><br>City Plan 2036: Revisions to pre-Submission Draft Plan                                 | <b>Public</b>       |
| <b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b> | <b>2,4,7,11,12</b>  |
| <b>Does this proposal require extra revenue and/or capital spending?</b>                                  | <b>N</b>            |
| <b>If so, how much?</b>   | <b>£0</b>           |
| <b>What is the source of Funding?</b>   | <b>N/A</b>          |
| <b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>                             | <b>N/A</b>          |
| <b>Report of:</b><br>Carolyn Dwyer, Director of the Built Environment                                     | <b>For Decision</b> |
| <b>Report author:</b><br>Peter Shadbolt, Department of the Built Environment                              |                     |

### Summary

At the meeting of the Local Plan Sub-Committee on 20<sup>th</sup> October 2020, Members considered a schedule of proposed changes to the draft Local Plan, asked for clarification on some of the proposed changes and asked for further changes to be considered. This report responds to the questions and further clarification sought by the Sub-Committee and a revised schedule of changes is attached.

### Recommendation(s)

Members are asked to:

- Agree the suggested approach outlined in this report and the schedule of proposed changes, for onward consideration by Planning & Transportation Committee.

### Main Report

#### Background

1. This paper sets out the key issues raised at the Local Plan Sub-Committee meeting on 20<sup>th</sup> October and suggests an approach to further changes in the draft Local Plan to address these issues. The further changes are not detailed in this paper but if Members are content with the suggested approach then the detailed changes will be included in the papers being prepared for consideration on 17<sup>th</sup> November Planning and Transportation Committee. The detailed changes are being prepared and a schedule of changes will be laid around the table on the day to inform the Sub-Committee discussion.

### **Local Plan Timetable**

2. Members asked whether the timetable to progress the Local Plan through to consultation could be speeded up by targeting Court of Common Council in December 2020 rather than January 2021. Legal advice is that material changes to the Plan at this stage need to be considered at Planning & Transportation and Policy & Resources Committees and Court of Common Council. To meet the 3<sup>rd</sup> December Court of Common Council date, the changes to the Local Plan would need to be considered by Planning & Transportation Committee on 17<sup>th</sup> November (as currently planned) and by Policy & Resources Committee on 19<sup>th</sup> November.
3. In the past, Committee approval has sometimes been obtained in the same committee cycle but that was when substantive debate and further changes were not expected at Planning & Transportation Committee. This approach is not advised on this occasion as there is already some disquiet among some Planning & Transportation Committee Members regarding approval of the draft Plan in March which was by Chairman's action following consideration at an informal virtual meeting. Given all that has happened since Planning & Transportation Committee in March when the Grand Committee last considered the Plan, it is considered appropriate to allow time for proper consideration by Committee Members at a formal meeting in November with time then allowed for suggested changes to be included in the draft Plan before consideration by Policy & Resources Committee in December.
4. Officers would also advise against starting formal public consultation on the Plan changes immediately prior to the Christmas holiday period, so seeking Court approval in December would not speed up the process in a substantive way. Officers, therefore, advise that the current approval timetable be retained.

### **Financial Impacts of Covid**

5. Members raised concerns about the financial impacts of Covid on the City Corporation and TfL, in particular, and whether these shorter-term financial impacts could have longer term consequences that should be reflected in the Local Plan.
6. As set out at the previous meeting of the Sub-Committee, officers consider that the draft Plan is flexible and adaptable to rapidly changing circumstances, including potential financial impacts. This could be better expressed in the Plan, with further brief references added to the Plan's Introduction and Monitoring sections addressing the need for flexibility, including a recognition that Covid is having short term financial and other implications which may impact on, or delay, implementation of some policy aspirations. This could also address the short term financial impacts on TfL, highlighting the importance of good regional, local and global transport links to the City's future.



## London Recharged Report

7. The London Recharged Report, produced by the City Corporation in partnership with Oliver Wyman and Arup, was published on 20<sup>th</sup> October 2020. Press reports portrayed this as a 5 year plan for the City of London to recover from Covid. The report is intended, not as a plan, but as a series of recommendations to assist London as a whole in its recovery from the pandemic. The report makes recommendations for the ways that businesses operate in London, the role of local and central government and the need to deliver a more diverse and representative workforce that makes the best use of London's talents. Amongst the key recommendations are a number that specifically relate to the work of the Planning & Transportation Committee, including:
  - Create spaces to innovate, akin to start-up incubators. The incubators should provide work spaces with experts from government, academia and business to coalesce and innovate on specific priority themes.
  - Pilot transformation of London's office stock to support new uses, including the development of 'hyper flexible spaces'.
  - Motivate SMEs and artists to re-enter the city centre by providing 'hives' of affordable work space and access to basic infrastructure.
  - Explore ways to innovate London's transport network considering new consumer/ commuter behaviours and the network's financial difficulties. Options could include the creation of 'flexible working' season tickets.
  
8. The Local Plan aligns closely with a number of these recommendations and officers participated in the steering groups informing its production. A more detailed analysis of the relationship between the Local Plan and London Recharged will be reported verbally at the Sub-Committee meeting on 4<sup>th</sup> November 2020, but in summary the Local Plan does:
  - Encourage flexible and adaptable workspaces, including the need for incubator space and space for innovation and start-ups.
  - Encourage active and vibrant uses at ground floor, to animate City spaces and provide an environment which is attractive to investors and workers.
  - Highlight the importance of culture and cultural enterprises in the City's attractiveness, including a new requirement for major developments to provide cultural plans and to consider the provision of creative spaces.
  - Place greater emphasis on transport within and to the City of London, increasing opportunities for active travel and emphasising the importance of the City as a sustainable business hub.
  
9. It is significant that the London Recharged Report has been prepared during the Covid pandemic and was informed by interviews with many senior figures to gauge their latest views on the short term and long term implications of the pandemic for London. The close alignment between the Local Plan and the recommendations in the London Recharged Report provide some reassurance that the Plan is sufficiently flexible to still be relevant in current circumstances.

## **15 Minute City**

10. Members asked about the concept of the 15 Minute City and its relevance to the City of London. As was explained at the meeting, this concept is more relevant to cities with a high local residential population and the opportunity to minimise travel to work, providing all necessary facilities within a 15 minute walk of residential homes. This concept is of less relevance to the City where the local residential population is much lower, but officers have suggested changes in the schedule to address the concept and explain its relevance to the City. More emphasis is put on the role of the City as being at the centre of a sustainable transport hub, which enables talented businesses and workers to come together in a central location to deliver sustainable economic growth.

## **Development Pipeline**

11. Members sought reassurance that the pipeline of commercial development in the City was robust in the face of Covid.
12. The Plan's employment growth projections and the related office space growth target pre-date Covid and its health, behavioural and economic effects. Employment growth may be slower in the short to medium term than previously projected due to economic disruption and behavioural changes such as more remote and occasional working. However, lower levels of employment growth do not translate directly into lower demand, and need, for office floorspace overall. Covid restrictions have significantly reduced current office occupancy capacity and as we come out of the pandemic, it is likely that we will see a renewed emphasis on providing more social and collaborative space in buildings, with lower office occupation densities overall. In the short to medium term, reductions in employees commuting daily into the City may be offset by this trend for lower occupation density and more social space. Some firms may reduce their total space requirements but that may provide opportunities for other firms who previously did not have much presence in the City to take up the newly available space in what is an excellent, accessible business location. The net result of these emerging trends will be monitored carefully to ensure that the Plan policy implementation remains appropriate to the evolving picture.
13. The draft Plan provides for an uplift in office floorspace of 2 million square metres over the period 2016 to 2036. As at March 2020, there had already been a net gain in office stock of 0.58 million square metres (29% of the target) with a further 0.76 million square metres (38% of target) under construction. Therefore 67% of the target is likely to have been completed by the end of 2021. Additional information on the planning pipeline will be tabled at the meeting, highlighting the continued developer and investor interest in the City as a business location. The Covid pandemic may alter the character of the office floorspace provided in the City to address changing occupier needs but that does not mean that the overall target is unrealistic or inappropriate this stage. The overall office floorspace target is therefore considered to be achievable and is consistent with our wider aspirations for the City as a commercial centre of innovation and creativity.

## **Mix of Uses**

14. Members asked officers to look at the balance of office and residential development to see whether the Plan had the balance right between encouraging office development and housing in appropriate locations. This was related to the current significant reduction in workers coming into the City and the growth in remote working.
15. Local Plan Policy S3: Housing encourages additional housing on appropriate sites within or near to the identified residential areas, except where such development would prejudice the City's primary business function. The wording of the policy has been changed from the current adopted Plan, and earlier draft Plans, which referred to 'providing' new housing and 'guiding' new housing, to provide a more positive encouragement, particularly of new and innovative forms of housing such as co-living or build to rent.
16. Local Plan Policy OF2: Protection of Existing Office Accommodation, resists the loss of suitable and viable office accommodation, but does allow for the loss of office accommodation within and near residential areas where the proposed development would not compromise the potential for office development in the vicinity and would have demonstrable wider benefits for other Plan objectives.
17. The draft Plan is already considered to be more positive towards residential development than the adopted Local Plan, with a specific focus on new and innovative forms of housing. Further change is not considered necessary at present, but the flexible and adaptable nature of the Plan does allow changing circumstances to be reflected.

## **Retail Development**

18. Members sought reassurance on the approach to retail development in the draft Plan in light of the significant retail downturn as a result of Covid and the growth of online shopping, exacerbated in the City of London by the substantial reduction in the footfall of City workers as companies switched to remote working.
19. Officers previously explained that the overall retail trends and the areas for retail growth in the City continued to be relevant in a long term 15-year plan, but that specific targets should either be deleted or used as aspirational monitoring targets. A particular concern was the reliance on a 2017 study to justify retail growth and the need to update it.
20. Since the meeting on 20<sup>th</sup> October, officers have liaised with the City's retail consultant on a potential update or supplementary commentary to the 2017 retail report to take account of current circumstances and provide a robust basis for the retail policies in the version of the Plan that will be submitted for examination. A verbal update will be provided at the Sub-Committee meeting.

### **Fleet Street**

21. Members raised concerns about the mix of retail provision on Fleet Street and the specific difficulties that this area faced. Officers reported on a meeting with the Fleet Street Quarter Partnership and the potential for a Business Improvement District (BID) going forward and have suggested wording in the schedule of changes to highlight this joint working in the Fleet Street area.
22. The draft Plan already reflects the joint working taking place through the Aldgate Partnership and the emerging proposals for a BID in the City Cluster area in the relevant Key Areas of Change policies. Since Cheapside is not within a proposed Key Area of Change, there are only passing references to the Cheapside BID in the Plan and an additional reference will be added to the retail section of the Plan to highlight the work being undertaken by the Cheapside BID to promote this area as the City's 'High Street'.

### **Detailed Comments**

23. Officers agreed to look further at a number of detailed comments, which are addressed in the revised schedule of changes:
  - Smithfield and Barbican – ensuring that the policy and textual wording reflects the current position on the Markets Consolidation Programme, and the potential for re-use of the whole or part of Smithfield Market.
  - Air Quality – wording is amended to 'strongly' resist in part 2 of Policy HL2.
  - Housing outside the City – the Housing Strategy 2019-23 target dates are removed so that the target of 700 new social homes better reflects the Corporation's current housing programme.
  - Temporary retail pop-ups – wording is adjusted to recognise the potential for adverse impacts arising from 'permanent' pop-ups which compete with established retail.

### **Corporate & Strategic Implications**

24. Strategic implications – The review of the Local Plan is informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The Proposed Submission draft Plan provides a spatial planning framework to support the Climate Action Strategy and key corporate capital projects, along with proposals to ensure a sufficient supply of business space to meet future needs. It also aligns with the adopted Transport Strategy.
25. There are no financial, resource, legal, risk or security implications arising from this report.
26. Equalities implications – the Local Plan has been informed by an Integrated Impact Assessment which incorporates an Equalities Impact Assessment.

## **Conclusion**

27. This report responds to the questions and further clarification on changes to the draft Local Plan sought by the Sub-Committee at its meeting on 20<sup>th</sup> October 2020. A revised schedule of changes is attached.

## **Appendices**

Appendix 1: Schedule of further proposed amendments to the Proposed Submission version of the City of London Local Plan

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| Schedule of proposed changes to the version of City Plan 2036 approved by Court of Common Council in May 2020 |  |  |
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| Policy/paragraph  | Proposed change  | Reason for change  |
| Introduction:<br>Policy context<br>Paragraphs 1.3.5 –<br>1.3.6  | <p>Policy context</p> <p><b><u>1.3.5. This Plan is being prepared in an era of significant and rapid change and has been deliberately drafted to provide a flexible policy framework. Within this wider framework, the Local Plan can provide an environment</u></b> which encourages appropriate development and is responsive and adaptable to change.</p> <p><b><u>1.3.6 In particular, the Plan seeks to provide a flexible, resilient policy framework which responds to three fundamental health and well-being, environmental and economic influences: Covid-19, climate change, and the UK's departure from the European Union.</u></b></p> <p><u>Climate change</u></p> <p><b><u>1.3.7 The threat from climate change is one of the most serious threats we face today. It extends beyond environmental challenges and has the potential to affect economic prosperity, social justice and global stability. Wide ranging responses are essential, encompassing individual local actions, local, strategic and national government programmes, business and community scale initiatives and global agreements. Scientific evidence indicates that the climate is already changing, and that action is needed to limit global warming to 1.5 degrees.</u></b></p> <p><b><u>1.3.8 The City Corporation has long been a champion of clean air, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal well-being. It has in 2020 adopted a Climate Action Strategy which sets out a pathway to achieving net zero emissions for both the City</u></b></p> | To reflect impacts arising from the publication of the City Corporation's Climate Action Strategy, the Covid-19 pandemic and updated trading relationships |

Corporation's activities and the wider activities of businesses and residents in the City of London. The Strategy and, more importantly, the actions outlined will ensure the Square Mile and City Corporation achieve net zero carbon by 2040 and make a positive contribution to tackling climate change, are resilient to the risks of climate change and seize the opportunities presented by the transition to a low-carbon economy.

#### Covid-19 pandemic

1.3.9 Much of this Plan was drafted prior to the outbreak of the Covid-19 pandemic, which has had significant health, well-being, environmental and economic impacts locally and globally. As medical treatments are discovered and rolled out, including potential vaccines, the severity of these health impacts is expected to reduce and communities will recover in the medium term. However, the pandemic is also leading to behavioural changes; some are temporary, but some are likely to become established as part of the 'new normal'. The acceleration of existing trends and the creation of new trends both need to be taken into account when planning for the medium and longer term. Therefore, the Plan is looking beyond the current pandemic to a period when a probable vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation which harnesses the potential of existing and new trends.

1.3.10 Throughout its long history the City of London has been a centre for creative innovation and collaboration, bringing business and people together. The Covid-19 pandemic has in the short term shifted much of the City's business online with many City workers using modern technology to work from home, and consequently significant reductions in journeys into the City and footfall within it. Whilst the use of digital technology and remote working will remain important to the success of many City businesses in the future, reliance solely on remote working can have longer term drawbacks as it can limit the scope of the creative innovation, collaboration and informal business relationships that the City thrives upon. Therefore, it is expected that the City will remain an attractive base for a wide range of existing and new businesses,



operating more flexibly with a blended approach of in-office and remote working, to meet the changing business environment, space needs and lifestyle expectations of their workforce. The return of City workers will bring vitality to provide a boost to businesses that rely on high footfall, including retail, food and beverage and support services to the City's offices, that have been particularly affected by Covid-19.

1.3.11 Although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.

1.3.xx The City Corporation will work closely with national, regional and local government, landowners and investors, businesses and residents to ensure that the City of London remains successful. It is acknowledged that the pandemic will have short and perhaps medium term financial implications for the City Corporation and for Transport for London, which may impact on, or delay, implementation of some policy aspirations and will need to be closely monitored. Nonetheless, this Plan will provide a framework to give confidence to those who wish to be involved in and to invest in the City and it has been written to be adaptable to new changes and challenges as they present themselves.

#### UK trading relationships

1.3.12 As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on the international and national economic considerations and other external policies, particularly the United Kingdom's future

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|   | <p><del>trading relationship with the European Union and the rest of the world.</del> <u>context including future trading relationships. The UK's departure from the European Union is leading to new trading relationships and patterns. The City's reputation for expertise and innovation will be particularly important as it adapts its existing strengths in financial and professional services, and develops new strengths, to suit changing global circumstances.</u></p> <p>1.3.613. 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.</p>  |   |
| Vision, Strategic Objectives and Spatial Strategy:<br>3.2 Support a Thriving Economy<br>Paragraph 3.2.3                   | <p>3.2.3. The City will be open to new business, new ideas <b>and innovations</b> and new ways of working, <b>building upon the experience and lessons learned through the Covid-19 pandemic. New reflected in business</b> floorspace <del>that is</del> <b>will be</b> flexible and adaptable to meet the demands of different types of business occupiers <b>and their workforces</b>, 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.</p>   | To reflect impacts arising from the Covid-19 pandemic                   |
| Vision, Strategic Objectives and Spatial Strategy:<br>3.4 Key Areas of Change: Smithfield and Barbican<br>Paragraph 3.4.6 | <p>... Consolidation of the City Corporation's wholesale markets onto a single site outside of the City will <del>potentially</del> allow the re-use of Smithfield Market <b>in whole or in part</b> 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.</p> <p><b><u>Additional greening, new open spaces and pedestrian and cycling priority in appropriate locations will reduce Tt</u></b> the potential for conflict between vehicular access to commercial and residential uses, <b>and allowing for more effective management of</b> the increased numbers of pedestrians <del>will be effectively managed.</del></p> | Factual update to reflect progress on Smithfield Public Realm proposals |
| Policy HL2 - Air Quality  | Policy HL2: Air Quality   | To reflect advice from a Planning Inspector                             |

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|   | <p>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.</p> <p>2. Development that would result in a worsening of the City’s nitrogen dioxide or PM10 and PM2.5 pollution levels will be <b>strongly resisted-refused</b>.</p> <p>...</p>   | <p>during an advisory visit, in which he commented that the current wording may not be realistic and that elsewhere in the Plan, the term ‘resisted’ is used</p>   |
| <p>Strategic Policy S3 - Housing:<br/>New paragraphs following paragraph 4.3.12</p> | <p>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.</p> <p><i>[moved from current paragraph 4.3.8]</i></p> <p><b><u>4.3.xx. The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London.</u></b> The City Corporation provides over 1,500 social housing units on 11 estates <b><u>that it owns and manages</u></b> outside of the City of London in <b><u>the six London boroughs of</u></b> Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City.</p> <p><b><u>4.3.xx. The City Corporation has committed to play a leading role in tackling the housing shortage in London with a pledge to build hundreds of new social homes and thousands of additional mixed tenure homes.</u></b> The City Corporation’s <b>Housing Strategy 2019-23</b> aims to deliver at least 700 new <b>social</b> homes on City-owned land and housing <b>estates with potential for renewal and expansion</b>. 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 <del>address</del> both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a further</p> | <p>To reflect advice from a Planning Inspector during an advisory visit, in which he commented that the Plan could provide a clearer narrative on how the City Corporation is meeting housing needs on land outside the City of London</p> |

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|   | <p>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.</p> <p><b><u>4.3.xx. The City Corporation’s plans to build new homes have encouraged both public and private sector partners to propose development opportunities and potential joint ventures. Options to increase the supply of new homes beyond the City Corporation’s own sites are being explored. The planned consolidation of the City Corporation owned and managed wholesale markets (Smithfield Meat Market, Billingsgate Fish Market and New Spitalfields Fruit and Vegetable Market) onto one site in Dagenham would provide an opportunity for mixed use redevelopment which could include housing. Billingsgate is a 5-hectare site next to Canary Wharf and New Spitalfields is a 13-hectare site in Leyton.</u></b></p>  |  |
| <p>Strategic Policy S4 - Offices:<br/>New paragraph after paragraph 5.1.7</p> | <p>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 2,000,000m<sup>2</sup> is derived from the estimated growth in office employment between 2016 and 2036 and represents a 23% increase in floorspace.</p> <p><b><u>5.1.xx. Notwithstanding the short term impacts of the Covid-19 pandemic on occupier demand and construction activity, the City has a robust development pipeline. In March 2020, approximately two-thirds of the total office floorspace target had either been completed since the baseline date of 2016 or was under construction. While the long term impacts of the pandemic on the office market are uncertain, it seems likely that many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be counteracted by a shift towards lower occupation densities and the provision of more breakout space within offices. The overall impact on floorspace demand may therefore be broadly neutral.</u></b></p> | <p>To reflect impacts arising from the Covid-19 pandemic</p> |

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| Retailing – context:<br>Paragraph 5.2.3                      | 5.2.3 The ways in which people shop and use retail facilities <del>is-are</del> 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. <b><u>The Covid-19 pandemic has significantly reduced footfall in town centres and retail centres nationally and hastened the growth of online retailing, having short-term impacts on the vitality and viability of many retail and leisure facilities.</u></b> Retail centres that provide a diverse range of <b><u>town centre uses, including</u></b> shops, services and leisure activities are likely to be in a better position to respond to changing retail demand <b><u>and recover from the impacts of Covid-19.</u></b> In the City, as elsewhere, there has been an expansion of <b><u>experiential retail</u></b> , leisure, <del>and</del> entertainment <b><u>and mixed</u></b> 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.  | To reflect impacts arising from the Covid-19 pandemic  |
| Policy RE1 – Principal Shopping Centres:<br>Paragraph 5.2.15 | <b>Cheapside</b><br>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 <b><u>A1-retail</u></b> 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. <b><u>The City Corporation will work with the Cheapside Business Alliance to promote Cheapside as a shopping, business and visitor destination and to support its evolution into a seven day a week destination.</u></b> 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. | To reflect changes to the Use Classes Order introduced in September 2020 and the importance of partnership working |

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| <p>Policy RE5 – Markets:<br/>Paragraph 5.2.27</p> | <p>Policy RE5: Markets</p> <p>Proposals for markets and temporary retail pop-ups will be <del>permitted</del> <b><u>encouraged</u></b> where they:</p> <ul style="list-style-type: none"> <li>• are of an appropriate scale and frequency for their location;</li> <li>• would not have a significant adverse impact on the vitality and viability of existing retail centres within or outside the City;</li> <li>• would not have a significant adverse impact on the amenity of nearby residents or business occupiers;</li> <li>• would not unduly obstruct pedestrian and vehicular movement; and</li> <li>• would not involve the permanent loss of open space or harm the character of that space.</li> </ul> <p>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. <b><u>Pop-up and meanwhile uses can minimise vacancies of retail premises while a long-term occupier is sought, and may be used to animate areas where construction works are taking place.</u></b></p> <p>...</p> <p>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 <b><u>permanent</u></b> markets and <b><u>opportunities for</u></b> pop-ups, the City Corporation will consider the potential for significant adverse impacts on <b><u>existing retail centres the trade of retailers occupying fixed units</u></b> within the vicinity together with impacts on the amenity of nearby residents or business occupiers, on pedestrian and vehicular movement or on open spaces.</p> | <p>To reflect impacts arising from the Covid-19 pandemic</p> |
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| <p>Vehicular Transport and Servicing – context:<br/>New paragraph after paragraph 6.2.1</p> | <p>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.</p> <p><b><u>6.2.x. The City has access to a very wide regional labour pool with many of its businesses drawing their workforces from destinations across London and the wider South East. The provision of safe, convenient, sustainable and effective public transport services and facilities is critical to the City’s international competitiveness and its ability to continue to attract highly skilled workers. Given the unique nature of the City, with its comparatively low residential population and its dependence on inward commuting, the widely publicised ‘15-minute cities’ concept is not directly relevant to the City’s circumstances, albeit that this Plan seeks to facilitate ease of access to jobs and services by walking and cycling for those who are able to do so.</u></b></p> | <p>To reflect impacts arising from the Covid-19 pandemic</p> |
| <p>Active Travel and Healthy Streets – context:<br/>Paragraph 6.3.2</p>                     | <p>6.3.2 The City’s workforce is expected to increase significantly over the course of the Plan period to 2036, <b><u>albeit that increased remote working means that actual footfall is unlikely to rise in proportion to total employment, while</u></b> visitor numbers are also anticipated to rise. This will result in significant <del>and increasing</del> 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. <b><u>This forecast was produced before the Covid-19 pandemic and it is uncertain to what extent the pandemic may affect medium and longer term pedestrian movement in the City. The pandemic has, however, emphasised the importance of facilitating safe and convenient</u></b></p>   | <p>To reflect impacts arising from the Covid-19 pandemic</p> |

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|   | <p><b><u>public transport services into and out of the City together with measures to ensure active travel and pedestrian comfort within the City's boundaries.</u></b></p>  |   |
| <p>Strategic Policy S22 - Fleet Street and Ludgate:<br/>Paragraph 7.7.9</p> | <p>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. Several major occupiers have vacated office buildings on Fleet Street in recent years, providing opportunities for beneficial change though 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.</p> <p><i>[moved to new paragraph]</i></p> <p><b><u>7.7.xx</u></b> There may be potential for partnership working between occupiers in the area to deliver improvements and more flexible use of some buildings whilst retaining a predominance of commercial uses which complement the City's business focus. <b><u>To assist with the development of a coherent vision for the area, the City Corporation will support the work of the Fleet Street Quarter Partnership in the process to become a Business Improvement District. The Partnership is keen to explore ways in which Fleet Street can act as a vibrant spine for the area, while improving its links with other parts of the City including the area up to High Holborn and access to the riverside.</u></b></p> | <p>To reflect the importance of partnership working</p> |