



Local Plans Sub (Planning and Transportation) Committee

Date: WEDNESDAY, 18 OCTOBER 2023

Time: 1.45 pm

Venue: COMMITTEE ROOM 3 - 2ND FLOOR WEST WING, GUILDHALL

Members:

Deputy Shравan Joshi (Chairman)	Deputy Alastair Moss
Graham Packham (Deputy Chairman)	Alderman Susan Pearson
Deputy Randall Anderson	Deputy Christopher Hayward, P&R (Ex- Officio Member)
John Edwards	Deputy Elizabeth King, PHES (Ex-Officio Member)
Deputy Charles Edward Lord	

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

2. **MEMBER DECLARATIONS UNDER THE CODE OF CONDUCT**

3. **MINUTES**

To agree the draft public minutes and non-public summary of the meeting held on 20 June 2023.

For Decision
(Pages 5 - 14)

4. **CITY PLAN 2040**

Report of the Interim Executive Director, Environment.

For Discussion
(Pages 15 - 36)

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

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

7. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

8. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 20 June 2023.

For Decision
(Pages 37 - 40)

9. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 20 June 2023

Minutes of the meeting of the Local Plans Sub (Planning and Transportation) Committee held at Committee Room 2 - 2nd Floor West Wing, Guildhall on Tuesday, 20 June 2023 at 9.00 am

Present

Members:

Deputy Shравan Joshi (Chairman)
Deputy Graham Packham (Deputy Chairman)
Deputy Randall Anderson
John Edwards
Deputy Alastair Moss
Elizabeth Anne King (Ex-Officio Member)

Officers:

Zoe Lewis – Town Clerk’s Department
Luke Major – Town Clerk’s Department
Ben Eley – Environment Department
Rob McNicol – Environment Department
Tom Nancollas – Environment Department
Garima Nayyar – Environment Department
Gwyn Richards – Environment Department
Michelle Rowland – Environment Department
Peter Shadbolt – Environment Department

1. **APOLOGIES**

Apologies for absence were received from Deputy Christopher Hayward and Alderwoman Susan Pearson.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT**

Deputy Alastair Moss declared an interest in specific sites referenced in the non-public discussion on Item 9 - City Plan – Tall Buildings. He left the room for the discussion relating to these sites.

3. **MINUTES**

RESOLVED – That the public minutes of the last meeting held on 23 May 2023 be approved as a correct record.

4. **CITY PLAN 2040 - OFFICES**

The Sub-Committee considered a report of the Planning and Development Director, which set out how policies in the City Plan could be updated to ensure that there would be a sufficient supply of offices to meet future demand.

An Officer stated that the National Planning Policy Framework (NPPF) emphasised the importance of planning for economic growth and productivity. Local plans such as the City Plan were expected to set out a clear economic vision which proactively encouraged sustainable economic growth. The London Plan focused on economic growth in the central activity zone of which the City was a core part. It recognised the importance of supporting the Central London office market.

Members were informed that GLA Economics had published updated employment projections in 2022 and these showed continued growth in employment in the square mile with a levelling off in the long term. To inform the updated City Plan, a study was commissioned by Arup and Knight Frank to look into the future of offices in the square mile. They considered the way in which offices were being occupied, demand, future challenges and opportunities. Andrew Tyler, one of the proprietary partners and Head of Commercial Development at Knight Frank gave a presentation. He stated that the City market extended to about 112million square feet. This equated to approximately 56million square feet in the City core, 9 million square feet in Aldgate, 18 million square feet in Clerkenwell and 20million in Midtown. Prime rents in the City for a non-tower building were £75 per square foot compared to the West End average of £125 per square foot. Take up of offices in the City in 2022 was 5.78million square feet. There were currently 7.8million square feet of development schemes under construction in the City. 2.8million square feet was already committed.

Members were informed that in relation to Grade A office space, there could be a potential shortfall of 7 million square feet by 2026. There was currently 4.59million square feet of active demand. This was a relatively stable figure. The current vacancy rate at the end of Quarter 4 2022 was 9.5%. There was a distinct flight to quality and there were now essentially only three grades of space: 1) Best in Class (Grade A+) - new or refurbished space that was above and beyond the British Council for Offices (BCO) specification with additional services added to enhance the tenant offering; 2) Grade - new and refurbished space that met the BCO specification, and 3) Grade B space - second-hand space that did not meet the Grade A specification or had previously been occupied and required substantial refurbishment.

The Sub-Committee were informed that in 2014, the take-up of second-hand Grade B space totalled 1.1million square feet which represented 14.5% of the total take-up for that year. In 2022, only 110,000 square feet of Grade B space was taken up which was 2.2% of the total demand. Demand for second hand Grade A space peaked in 2019 at 3.16million square feet which at that time was 51.9% of the demand. In 2022, second-hand Grade A space accounted for 1.52million square feet of demand which was 24.5% of the demand.

Members were advised that there had been a structural change post-pandemic with occupiers now demanding more from their office space. Office space was required to accommodate hybrid working solutions and collaboration amongst staff and many second-hand offices were not conducive to these objectives. It

was anticipated that demand for second-hand offices would continue to fall over the coming years.

Members were informed that there would be 23.5 million square feet of lease events between now and 2027 and this would provide many occupiers an opportunity to move and improve their accommodation. 20% of total office stock would have a lease event over the next four years. There would also be changes to the minimum energy efficiency standards. All properties had to have an Energy Performance Certificate (EPC) rating of C by 2027 and B by 2030. Across the whole of London there was 140 million square feet of office space with an EPC rating of C or below so 50% of total office stock would be incapable of being let in 2027. 94 million square feet of this space was outside of the City core and there was a risk that some of the buildings could not easily be upgraded to meet the minimum energy efficiency standards. There was an increased focus on the flight to quality demand for Best-in-Class offices. Growth could reduce in the next few years as existing occupiers looked to right-size their real estate footprint for hybrid working as leases expired. Best-in-class Grade A space was currently trading at a £10 a square foot premium which equated to £85 per square foot. Most occupiers surveyed remained intent on redesigning or reconfiguring their office space within the next three years with occupiers seeking to enhance the physical environment and make it a compelling place to work with each occupier having individual needs.

Matthew Dillon, Director and Leader of the City Economic s Team in Arup advised the Committee that Arup had worked alongside Knight Frank on this project. He stated that traditional office-based jobs still dominated, with finance, insurance, public sector jobs etc making up half the office jobs in the City. These had grown more slowly over the last six years (by 25%) but emerging office-based jobs e.g. communication, technology, professional, scientific and creative industries had experienced an 80% growth over the last six years. These sectors of the office market were projected to grow fastest in the future. They tended to be smaller organisations, were more agile and wanted a more dynamic working environment, often with lower workplace densities and higher amenity offices. They often need special facilities depending on the industry they were in. Prior to the covid pandemic, office workers typically attended the office about 75-80% of the week. Currently midweek levels were about 75-80% of 2019 levels, with offices just over 50% full on Mondays and Fridays. Members were informed that there were predictions for another 60,000 office jobs in the City by 2042. A range of different scenarios had been tested and the summary was that long-term growth prospects were good with the City requiring between 6 and 20million additional square feet of office space by 2042. However, the office market might soften significantly in the next few years as existing occupiers looked to right-size their space in response to hybrid working when their leases expired. Whilst the long-term growth prospects were good, the rest of the decade for the office market would probably be difficult.

The three scenarios tested were outlined to Members. The first scenario was the return of in-person office attendance which assumed working patterns

would return to approximately 80% of pre-pandemic patterns. The second scenario called Hybrid Peak looked at workers attending the office at about two-thirds of 2019 levels with a midweek concentration. The third scenario called the New Diverse City assumed that employees would attend the office, as they were now, at about 50% of 2019 levels but with a reasonably even spread throughout the week. This meant employers would be able to downsize their office space whilst keeping the same head count and it also meant that released office space would go back on the market and could potentially be refurbished and upgraded for new entrants or become available for conversion to other types of uses. Around a 10-30% increase in additional space would be required over the next 20 years. The in-person and hybrid peak scenarios were broadly aligned with the draft City Plan in terms of the net office space development required. The New Diverse City scenario assumed that over time, new organisations would move in and large scale working from home would mean the City could accommodate almost 150,000 additional office jobs. This was almost 50% higher than today's figure. These would be people who were not coming into the City every day and were substantially based remotely but whose head office was within the City. The City would need to remain attractive to new entrants and some price softening could be required over the next decade.

Members were shown a map of the offices that were currently below the EPC C rating. Significant investment would be required to meet the energy benchmarks. It was estimated that about 32 million square feet of office space in the City was EPC C or below. Some would be converted to Grade A or Best in Class by businesses, but others would be more challenging. This would include listed buildings and historical assets. Others would be difficult to make a financial case for conversion so in some limited circumstances where Grade B offices were obsolete, could not be viably refurbished and where there were wider sustainability and planning benefits, there could be a case for demolition.

Members were informed that it was expected that over time the City would remain desirable and that more home working could allow for more office jobs to be sustained from the same footprint. However, a proportion of the existing office stock would require investment in order to meet regulation needs and market demand. It was suggested that intervention was required to allow for fewer obstacles for older stock to be updated. It was recommended that in relation to the City Plan, steps be taken to increase the supply of best-in-class spaces in site. This would mean identifying sites that could be brought forward, providing advice for site owners, and working alongside them to bring forward sites. It was recommended that the planning framework support area additions and extensions when they were linked to wider sustainability goals. It was also suggested that the City should encourage conversion of existing Grade B stock to high quality offices where it could be, with this involving promotion, sharing of case studies in a similar way to the retrofit case studies which had been shared with the industry and more broadly supporting policies that encouraged retrofit and refurbishment and improvement of EPC ratings. It was also suggested that alternative uses for Grade B stock be encouraged when conversion to higher

grade office stock was not feasible. This would mean taking a more flexible approach to planning consent for heritage and stranded assets e.g. by exploring the implications of amending the policy that required a viability assessment when considering changes of use but only where this would incentivise the recent retention and improved environmental performance of existing buildings.

Other recommendations, beyond the City Plan, were outlined to Members. It was recommended to increase the supply of higher quality sustainable office spaces by identifying opportunities within the market for investment and development, by continuing to promote and invest in amenities and the workplace experience to enable employees to attract employees back to the office and by attracting tourists. This would include investing in the public realm, attracting food, beverage and leisure offers and encouraging conversion of existing Grade B stock to higher grade office space. This would mean working with owners to continually monitor assets that might be at risk and working with owners and landowners to identify obstacles to conversion and how these might be removed.

It was suggested that a city advisory hub be formed to provide expert advice and connect developers, business owners, stakeholders and groups such as English Heritage to share skills, cost-effective methods and best-in-class approaches to updating heritage assets. It was recommended to protect some office space during the potential period of softening of demand in the short term. It was suggested that the construction industry campaign for low-cost carbon retrofit be supported. This could include supporting campaigns for VAT relief for sustainable retrofit. Alternative uses for Grade B stock could be encouraged where conversion was not feasible and so a more efficient use of office stock for long-term vacant sites should be monitored and supported back into use by promoting incentives to do so. As the demand curves were heavily dependent upon continuing to strengthen the City's role as a premium office market location, this meant encouraging growth in these emerging sectors e.g. creative industries, financial technology (fintech) industries, and industries requiring laboratory enabled offices as these emerging sectors would only be attracted to the city through marketing and having the right space, facilities and incentives available.

It was suggested that marketing should emphasise the City's role as a business hub, a place for innovation and a place where different industries became inspired by one another. This might involve promoting the City as the UK's first zero carbon office market. It was also recommended to leverage the City's Business Improvement Districts (BIDs) where possible to enhance the offer in the area and strengthen the City's role in people's working lives and leisure lives.

The Chairman asked how the 9.4m vacancy rate compared to previous years, how the return to work compared to other comparative global cities and how long it took between a scheme obtaining planning permission and being occupied. Andrew Tyler advised that the vacancy rate was just below the

average rate of 10%. There would always be some vacancies and this was required for natural growth. When looking at the return to the office post-pandemic, the best-in-class stock had the best rate of occupancy. The return to work in New York had been low due to more lower grade office stock and limited amenities in offices, however a Grade A best-in-class development in New York had 98% occupancy. The occupancy levels in Dublin were similar to London due to Grade B buildings being turned into best-in-class buildings. On average a 100,000 square feet refurbishment took about two years from being granted planning permission to being occupied. Larger schemes could take 4-5 years.

A Member referred to employers right-sizing and asked if employers would insist on employees working in the office on Mondays and Fridays to enable this to take place. Members were advised that soft and hard measures were being used to encourage staff back into the office on Mondays and Friday and informal and formal sub-letting of space, often not involving exchanges of money, was occurring.

A Member asked about whether the change in EPC regulations could feasibly be accomplished by 2027. Andrew Tyler stated that occupiers were already trying to align their own sustainability goals to the space and this regulation change was an accelerator. Whilst if the costs of achieving the regulations exceeded a certain percentage, the work did not need to be undertaken, the change was being driven by occupiers who wanted more sustainable offices.

In response to a Member's question, Matthew Dillon stated that the current situation was a large mid-week peak in office attendance with employers encouraging people back into work. It was likely the midweek peak would soften and also that a number of new industries would make the City their home in the next few years.

A Member commented that the change in EPC requirements would also apply to homes and stated that there were 4,000-5,000 apartments in the city which were Victorian conversions and had an EPC rating of E. He stated that this had not been addressed. An Officer stated that work would be undertaken to look at the challenges around residential units meeting the EPC requirements.

A Member stated the need to reduce the cost of the planning system on energy conversion projects e.g., currently planning permission was required to replace windows in a conservation area which looked identical to the originals but were made of a different, more energy efficient material. An Officer stated that the planning permission thresholds were governed by Central Government. An Officer stated that as part of the Climate Action Strategy, Historic Buildings Sustainability Challenge work was being undertaken. This was a detailed piece of work looking at different typologies of historic buildings and the work needed for them to meet standards.

In response to a Member's question about the projections in relation to office space, Matthew Dillon stated that there was a mixed picture and whilst the long term outlook was good, there could be challenges in the next few years. The

top end of the market was likely to remain strong throughout. An Officer stated that there was a proposal to encourage buildings to be retrofitted where there was a change of use from offices to hotel use, cultural use or educational use. The proposal was that as long as the office space was not strategically important space vital for office demand, and as long as the building was being retained and upgraded to bring it up to standard, there was no need to go through the owner's viability assessment process that the planning system currently required to show that it was not financially feasible to retain the building as an office. There would however still need to be a 12-month marketing exercise to test whether there was still a requirement for that use.

In response to a Member's question about the types of amenity being provided, Andrew Tyler stated that not all buildings could offer amenity spaces within the building but could provide this in the vicinity. Amenity space could include spaces for people to go and collaborate, spaces to contribute to mental health and wellness, quiet areas and social space.

In response to a Member's question about using local food and beverages producers, Andrew Tyler stated that more occupiers of offices were using this approach and were no longer seeking to have long term leases with large chains.

In response to a Member's question about the premium of £10 per square foot for best-in-class buildings, Andrew Tyler stated that it was unlikely there would be a premium once all buildings were brought up to this level. There would, however, continue to be a premium for tall buildings due to the views.

Matthew Dillon stated that corporate social responsibility was driving people towards low carbon offices. Emerging new sectors, that would grow more quickly, were more likely to require high quality, less dense offices. More clerical, back-office functions could be undertaken in lower grade offices and these types of industries were predicted to expand much more slowly.

RESOLVED - That Officers continue to progress work on the City Plan based on Members' views on the proposed policy direction in relation to the policies on office space.

5. **CITY PLAN 2040 - TALL BUILDINGS AND HERITAGE**

The Sub-Committee considered a report of the Planning and Development Director, which set out proposed amendments to City Plan policy on tall buildings, including where they might be appropriate and inappropriate; permissible heights within areas appropriate for tall buildings; and approaches to ensure development would conserve the special historic and architectural interest of Bevis Marks Synagogue.

An Officer stated that in 2021, a Regulation 19 consultation was undertaken on the City Plan. The Mayor of London and the Greater London Authority raised an issue of non-conformity with the City plan stating that there was a need to identify appropriate areas for tall buildings within the Plan and there was a need

to consider impacts on the Tower of London world heritage site. Concerns were raised by historic England about tall buildings coming forward in areas that could be harmful. Historic Places requested that specific strategic views be taken into account as well as strategic views set out in the London view management framework. There were also responses from the London Sephardi Trust and the Spanish and Portuguese Farsi community raising concerns particularly over the impact of tall buildings on historic buildings and their setting and in particular in relation to Bevis Marks synagogue in the City.

Members were informed that in order to address these issues, an extensive piece of work had been undertaken. A three-step process had been undertaken. The first step involved identifying appropriate locations for tall buildings, determining suitable building heights within those locations and evaluating potential developments impacts. The second step used three-dimensional modelling to undertake a complex sieving exercise to identify and analyse the character areas to assess their sensitivity to tall buildings. A range of criteria was considered including character and form of those areas, the strategic townscape, heritage and views and the heritage significance of the areas. The City Cluster and Holborn and Fleet Valley were identified through the process as being sensitive rather than very sensitive to tall buildings. The work had been expert peer reviewed by Dr Nigel Barker Mills. The third step was a detailed assessment of tall building areas looking at potential impacts on strategic views working with expert consultants. This involved complex three-dimensional mapping of constraints including the London view management framework, St Paul's heights viewing points, Monument views, views from the Tower of London. Many other constraints were also taken into consideration. More localised constraints and heritage considerations would be carried out when assessing specific applications.

Officers were proposing that modifications be made to policies within the City Plan. It was proposed to designate the City Cluster and the Fleet Valley area as tall building areas, with it being considered that other areas in the City were inappropriate for tall buildings. The definition of a tall building in the City was 75m or above so substantial developments were not precluded elsewhere in the City. It was also be proposed that maximum heights be set within the tall buildings' areas. A two-dimensional map and three dimensional digital model would be made available to the public and to developers. Members were informed that tall buildings would still be subject to very detailed policy assessment looking at a whole range of local impacts and design considerations.

The Officer stated that special consideration would be given to Bevis Marks Synagogue due to its proximity to the tall building cluster. Conversations had taken place with the Rabbi and other stakeholders within the area and there were a number of recommendations for policy proposals within the City Plan. It was proposed that an immediate setting area be put in place for the synagogue. This would require any development within the area to respect the synagogue. This was considered to be an appropriate route to take for this

special building given its unique setting and its courtyard setting within the City Cluster and within its historic environment. A policy approach was also being proposed to state that development within the City Cluster should not have an unacceptable impact on daylight levels within historic places of worship including the synagogue. An assessment of a potential conservation area covering the wider Creechurch area was being undertaken and would be considered by the Planning and Transportation Committee in July. Work on conservation areas was covered by separate legislation and whilst, not part of the work of the City Plan, it was complementary to this.

RESOLVED - That Officers continue to progress work on the City Plan based on Members' views on the proposed policy direction in relation to the policies on tall buildings.

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

There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
City Plan Timetable

An Officer stated that the City Plan work programme had been reviewed. He reported that good progress had been made on a number of studies, particularly with the office piece which was a core piece of work. There had been strong steers from the Sub-Committee and public consultation was currently being undertaken, plus work was taking place with transport colleagues to align with the transport strategy. Officers wanted to ensure that this could be fully analysed and considered that the programme would benefit from a shift in timescales, submitting the City Plan to the Sub-Committee in September rather than July and to a special meeting of the Planning and Transportation Committee in mid-November 2023. It would then be submitted to Policy and Resources Committee and the Court of Common Council. Public engagement would follow in February and March 2024.

8. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

9. **CITY PLAN 2040 - TALL BUILDINGS AND HERITAGE - NON-PUBLIC REPORT**

The Sub-Committee considered a non-public report of the Planning and Development Director which included maps and images of proposed tall building areas and heights.

RESOLVED - That Officers continue to progress work on the City Plan based on Members' views on the proposed policy direction in relation to the policies on tall buildings, informed by the areas and heights presented to them.

10. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions raised in the non-public session.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There were no additional, urgent items of business for consideration in the non-public session.

The meeting ended at 11.10 am

Chairman

Contact Officer: Zoe Lewis
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Committee(s)	Dated:
Local Plans Sub (Planning and Transportation) Committee	18/10/2023
Subject: City Plan 2040	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,5,6,7,8,9,11,12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Bob Roberts, Interim Executive Director of Environment	For Discussion
Report author: Rob McNicol, Assistant Director – Planning Policy and Strategy	

Summary

The City Plan 2040 is a new local plan for the City of London, setting the policies and strategic priorities that will guide the growth of the Square Mile up to 2040. Over the last 18 months, new evidence has been produced and engagement has taken place to inform the Plan. The City Plan has been amended to reflect the findings of evidence, to take into account the engagement responses received, and to align the Plan with updated corporate strategies.

This paper sets out the direction of the Plan and summarises the main changes to policies.

Recommendation(s)

Members are asked to:

- Advise on the proposed policy changes.

Main Report

Background

1. The City Plan 2040 has been in development for a number of years and has undergone extensive public engagement over this time:
 - 2016 – an issues and options consultation took place (the ‘regulation 18’ consultation)

- 2018 – consultation on a draft local plan
 - 2021 – the first proposed submission version of the City Plan was published and consulted on (regulation 19 stage)
 - 2023 – an informal consultation has been carried out to inform updates to the Plan
2. This latest version of the City Plan 2040 is an updated submission version of the Plan, which will be considered by the Planning and Transportation Committee, Policy and Resources Committee and the Court of Common Council over the coming months, before being submitted to the Secretary of State for public examination.
 3. The plan has undergone extensive changes. However, it remains consistent in many ways with previous versions of the Plan that have been consulted on. The subject and approach of many policies remains as before, and the strategic priorities (which have been added in this version) are based on the spatial strategy from the previous version. The overall approach in the Plan is similar to earlier versions – however, the Plan has been updated to take account of recent evidence, which has broadly confirmed the direction of travel, and public consultation. Many of the changes that have been made to the Plan are to eradicate duplication and make it a more usable document. Some changes are, however, more substantive; where this is the case they have been identified in this report.
 4. The version of the Plan attached at Appendix 1 will undergo further work and minor amendments over the next month, prior to consideration by the Planning and Transportation Committee, including:
 - Further proofing and editing to ensure the language we use is clear and consistent, and to reduce the length of the document as far as possible
 - Revisions to maps and diagrams
 - Final policy changes following the completion of evidence that remains in progress
 5. There is also an opportunity for changes to be made in response to the feedback of this Local Plan sub committee. Any substantive changes will be reported to the Planning and Transportation Committee.

Chapter 1 – Introduction

6. This chapter has been deleted from the plan. It contained background information on why a local plan is being produced, the stages the plan has been taken through, the broad policy context, and summarises the structure of the plan. Some of these are important pieces of information to retain but they do not need to be at the start of the document; they are rarely looked at in the day-to-day use of a local plan. They will be revised, summarised and contained in an appendix.

Chapter 2 – The City Today

7. This chapter has been deleted from the plan. It contained a series of infographics setting out the key stats about the Square Mile, such as the amount of jobs, residents, size of open spaces, etc. Providing a static snapshot of this information, which will date rapidly, is potentially misleading. Instead, the planning department are producing new, digital approaches to monitoring that will provide better and more meaningful data about the City, updated regularly and providing historic time series wherever possible.

Chapter 3 – Vision, Strategy and Spatial Objectives

8. This chapter has been reformatted and revised extensively. The previous version used the framing of the City Corporation's corporate plan 2018-2023, which is in the process of being replaced. For each of the three corporate plan aims, there was a vision for the Square Mile and a strategic objective. A vision was also set out for each Key Area of Change. A spatial strategy set out a series of 11 further objectives for the Plan.
9. In the refreshed version, this approach has been simplified and revised, and updated to comply with the Planning and Compulsory Purchase Act 2004 (as amended by the Neighbourhood Planning Act 2017), which requires local planning authorities to identify the strategic priorities for the development and use of land in the authority's area. A series of strategic priorities have been set out, grouped together under the three sustainable development objectives set out in the National Planning Policy Framework (NPPF). These strategic priorities have been informed by the objectives set out in the spatial strategy of the first proposed submission version of the plan, as well as other corporate strategies such as the Transport Strategy, and (like everything in the revised Plan) have been informed by evidence and stakeholder engagement.
10. A new spatial strategy has been added. This focuses on those aspects of the plan that have a spatial dimension, such as where tall buildings should be located and where new housing will be focussed.

Policy Changes

11. Almost all policies have been amended, however many amendments are relatively minor in scope. The amendments are summarised for each policy below.

Health, Inclusion and Safety

Strategic Policy S1: Healthy and Inclusive City

12. This is a strategic policy setting out how the City and development in the Square Mile should contribute to improving health and inclusion. References have been added to enabling communities to access opportunities for employment as well

as sports provision (alongside other opportunities). A requirement has been added for development to take inclusive approaches to design. The 'how the policy works' section and context section before the policy have been removed as these are largely repetitive of, or have been incorporated into, other text in the Plan.

Policy HL1: Inclusive buildings and spaces

13. The main changes are amendments to fully reflect all of the protected characteristics, in line with the Equality Act; a requirement for major development to submit an equality impact assessment; and a requirement for development to promote the achievement of equity, diversity and social inclusion.
14. Supporting text has been updated to reflect these changes and to highlight how inclusive design can take neurodiversity into consideration.

Policy HL2: Air quality

15. The main changes are requiring development to avoid the use of diesel powered generators where possible, and to comply with the London Low Emission Zone for non road mobile machinery.

Policy HL3: Noise

16. This policy previously covered both noise and light pollution. A separate design policy (DE9) covered lighting. In order to simplify the plan, and to reflect the increased emphasis on lighting as a result of the City Corporation's lighting charter and Lighting SPD, the lighting aspects of HL3 have been merged into policy DE9.
17. The policy wording regarding noise has been clarified to distinguish between new noise-generating uses and the potential impacts of existing noise-generating uses on proposed development, with reference to the 'agent of change' principle added in relation to the latter. A requirement has been added for developers to explore opportunities to enhance the acoustic environment.

Policy HL4: Contaminated land and water quality

18. No changes have been made to the policy.

Policy HL5: Location and protection of social and community facilities

19. The policy has been amended to ensure that any replacement facilities are equivalent to those being replaced. The requirement for new facilities to not

prejudice the business city has been removed from this policy, as it is adequately addressed under policy OF2.

Policy HL6: Public toilets

20. The policy has been amended to ensure facilities are provided for different types of users, including the provision of 'changing places' facilities.

Policy HL7: Sport and recreation

21. The policy has been amended to reflect the City Corporation's aims to support a greater sport and recreation offer, and the creation of a network of facilities across the Square Mile.

Policy HL8: Play areas and facilities

22. The policy has been amended to seek additional play facilities in appropriate locations, and to ensure play facilities are designed inclusively.

Policy HL9: Health impact assessments (HIA)

23. The requirements of the policy have been tightened to ensure that all major development undertakes an HIA. Previously, this only applied to some, with other forms able to carry out a checklist; in practice, developers are already complying with the requirement for rapid or full HIAs.

Strategic Policy S2: Safe and Secure City

24. The policy has been amended to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

Policy SA1: Publicly accessible locations

25. The name of the policy has been amended from 'crowded places', to reflect more up to date terminology.
26. to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

Policy SA2: Dispersal routes

27. No substantial changes to the policy.

Policy SA3: Designing in security

28. The policy has been amended to mention 'secured by design' principles and to give further advice on how hostile vehicle mitigation should be designed.

Housing

Strategic Policy S3: Housing

29. The housing requirement for the Plan has been updated to reflect both the London Plan (up to 2029) and the requirement for housing beyond this period set out in national policy.

30. An additional clause has been added that seeks to prioritise specific forms of housing in residential areas, as these reflect the majority of the City's housing need, as identified in the Strategic Housing Market Assessment.

Policy HS1: Location of new housing

31. The relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to support a mix of cultural and community uses in residential areas (amongst other uses).

Policy HS2: Loss of housing

32. The supporting text has been amended to provide guidance on those situations where amalgamation of housing units might be acceptable.

Policy HS3: Residential environment

33. Reference to the lighting policy (DE9) has been added.

34. Reference to the agent of change principle has been removed from this policy, as it isn't directly applicable and is covered more clearly elsewhere in the plan.

Policy HS4: Housing quality standards

35. The relationship of the policy to London Plan residential standards has been clarified.

Policy HS5: Short term residential letting

36. No substantive changes to the policy.

Policy HS6: Student accommodation and hostels

37. The policy has been amended to require high design and amenity standards and good connections to educational institutions. Supporting text has been amended to refer to GLA guidance on accessible accommodation, and to advise developers to liaise with local residents and businesses.

Policy HS7: The Temples

38. The policy has been moved to chapter XX (see below).

Policy HS7: Older persons housing

39. The housing target for older persons housing has been amended, in line with the requirements of the SHMA.

Policy HS8: Self and custom build housing

40. No changes to the policy.

Offices

Strategic Policy S4: Offices

41. The target for office floorspace has been amended to reflect the recent evidence in the City Corporation's future of offices study, with an aim to provide a minimum of 1.2m square metres of additional office floorspace over the lifetime of the City Plan.

42. The policy has been amended to promote the retrofitting and upgrading of existing office buildings.

Policy OF1: Office development

43. The policy has been amended to promote retrofitting, wellbeing and circular economy design approaches. Supporting text has been updated to provide guidance on the functioning and design of office lobbies as places that can contribute to the life of the City.

Policy OF2: Protection of existing office floorspace

44. The policy has been substantially amended, to provide clarity on the situations in which the loss of office floorspace would be acceptable. The first part of the policy sets conditions that all such applications would need to meet. The second part sets out four routes for development, provided they meet the first part of the policy. These routes include the 'retrofit fast track'. The other three routes were already set out in the previous version of the policy but have been reworded for clarity.

Policy OF3: Temporary 'meanwhile' uses

45. The policy has been amended to encourage meanwhile uses, and to require major development that would affect existing retail units to set out how they would maintain active uses in these units prior to redevelopment.

Retail

Policy S5: Retail and active frontages

46. A clearer strategic direction to diversity and make retail areas more vibrant, including through partnership working, has been added to the policy.
47. The 'retail links' have been removed from the plan, with greater support for the retention and encouragement of a broader range of 'active frontage' uses across the Square Mile.
48. The policy now encourages the opening of retail and other uses in the evenings and weekends.

Policy RE1: Principal Shopping Centres

49. No substantive changes to the policy. The wording of policy has been clarified.
50. The sections setting out the strategic approach for each of the four PSCs has been amended in response to recent evidence and engagement.

Policy RE2: Retail links

51. This policy has been deleted, with a more consistent and clear approach to active frontage uses set out in policy RE3.

Policy RE2: Active frontages

52. This policy was previously titled 'Ground floor retail provision elsewhere in the City'. The policy has been amended to encourage a broader range of retail and related uses across the City, and to resist the loss of active frontages.

Policy RE3: Specialist retail uses and clusters

53. This policy has been expanded in response to recent evidence, seeking to ensure that retail provision in different parts of the City responds to its context and character.

Policy RE4: Markets

54. This policy has been amended to more positively support markets, recognising that they have the capacity to enhance existing retail areas, not simply have an adverse impact on them.

Culture and visitors

Strategic Policy S6: Culture and Visitors

55. This policy has been substantially amended, in response to the City Corporations Destination City vision and the strategic priority to transform the Square Mile as a leading leisure and cultural destination.

Policy CV1: Protection of existing visitor, arts and cultural facilities

56. No substantive changes to the policy.

Policy CV2: Provision of Arts, Culture and Leisure Facilities

57. This is a new policy, reflecting the City's vision for culture and leisure in the Square Mile. It seeks to encourage new provision of arts, culture and leisure facilities by requiring on-site facilities from very large scale development and provision (either on site, off site, or through contributions) from all major development.
58. This approach will be informed by the new cultural planning framework, which will set out focal areas for cultural provision across the Square Mile.

Policy CV3: Provision of visitor facilities

59. No substantive changes to the policy.

Policy CV4: Hotels

60. The policy relationship between this policy and the loss of offices policy has been clarified.
61. The policy has been amended to require provision of active uses at ground floor level in new hotel development, and to ensure hotels come forward in suitable locations.
62. Supporting text has been updated to reflect the hotel demand identified in recent evidence.

Policy CV5: Evening and night time economy

63. The policy has been amended to refer to the agent of change principle.

Policy CV6: Public art

64. No substantive changes to the policy. Wording has been amended to ensure inclusive terms are used in reference to disabled people.

Infrastructure

Policy S7: Infrastructure and utilities

65. This policy has been amended to refer to the importance of infrastructure in planning for a net zero City. The City Corporation's Utility Infrastructure Strategy has been referenced in supporting text.

Policy IN1: Infrastructure provision and connection

66. Minor changes have been made to policy to allow more flexible approaches to applications and to encourage innovative solutions to facilitate network connections.

Policy IN2: Infrastructure Capacity

67. No substantive changes have been made.

Policy IN3: Pipe subways

68. No substantive changes have been made.

Design

Strategic Policy S8: Design

69. This policy has been extensively revised, clarifying approaches to sustainable design, site capacity and vibrancy. Biodiversity has been added to the policy, as has consideration of health for design approaches. The need for stakeholder engagement has been highlighted.

Policy DE1: Sustainable design

70. This policy has been extensively revised, setting out the new 'retrofit first' approach and the need to follow the City Corporation's Carbon Options Guidance.
71. Parts of policy CE1 (Zero waste design) that relate to circular economy design approaches have been moved into this policy, as they are more relevant in this location.

Policy DE2: Design quality

72. The policy has been amended to ensure new development provides inclusive spaces, active frontages, and greening, and the need for community engagement. Supporting text has been updated.

Policy DE3: Public realm

73. The policy has been extensively amended to reflect numerous aspects of how public realm can contribute to the built and natural environment, including green infrastructure, public art, seating, and other features. The need for inclusive and accessible public realm has been emphasised in the policy and expanded.
74. Supporting text has been updated in line with the refreshed policy approach.

Policy DE4: Pedestrian permeability

75. The policy has been merged with policy AT1, to avoid repetition and improve clarity. The policy has been deleted from this location.

Policy DE5: Terraces and viewing galleries

76. The functioning of policy requirements for roof terraces and viewing galleries has been strengthened, with additional reference to complementary cultural and leisure facilities to create a mixture of destinations.

Policy DE6: Shopfronts

77. Minor amendments to the policy have been made to emphasise the need to create active frontages and consider the use of awnings.

Policy DE7: Advertisements

78. Minor changes to the policy have been made to support flags and banners where appropriate for cultural institutions, and the use of advertisements associated with one-off events in the City.

Policy DE8: Daylight and sunlight

79. The policy has been amended to refer to a broader range of sensitive receptors that could be impacted by loss of daylight or sunlight, and to refer to daylight and sunlight levels in historic interiors.

Policy DE9: Lighting

80. The broad thrust of the policy remains, however it has been amended in line with the approach set out in the City Corporation's Lighting SPD and best practice.

Transport

Strategic Policy S9: Transport and servicing

81. Minor changes have been made to the policy to reflect current approaches on the restriction of on-street parking.

Policy VT1: The impacts of development on transport

82. This policy has been revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

Policy VT2: Freight and Servicing

83. Minor changes have been made to the policy, including reference to the use of servicing lifts in appropriate locations.
84. Wording in the policy has been clarified around servicing hours and sustainable deliveries.

85. revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

Policy VT3: Vehicle servicing and parking

86. Reference to the use of under utilised car parks as last mile delivery hubs has been removed, however support for their alternative transport uses has been retained.

Policy VT4: River transport

87. This policy has been amended to give greater emphasis to river-based transport of people and freight, and to resist permanent moorings of vessels, in line with the aim to create a more inclusive, welcoming and vibrant riverfront.

Policy VT5: Aviation Landing Facilities

88. No changes have been made to this policy.

Strategic Policy S10: Active Travel and Healthy Streets

89. The policy has been amended to reflect the recently updated Transport Strategy, including placing increased emphasis on inclusion and prioritising the needs of people walking and wheeling. Explicit reference to the healthy streets approach has also been added to the policy.

Policy AT1: Pedestrian Movement, Permeability and Wayfinding

90. This policy has been amended to reflect the requirements of policy DE4, which set out closely related policy requirements.
91. An addition to the policy has been made in relation to the need to improve wayfinding through a variety of means.

Policy AT2: Active Travel including Cycling

92. A reference has been added to the London cycling design standards. Supporting text advises that accessible shower and changing facilities should be provided in appropriate new development.

Policy AT3: Cycle Parking

93. This policy has been amended to require cycle parking to be conveniently located, easily accessible, safe and secure. Supporting text has been amended to advise that a proportion of cycle parking spaces should flexibly provide storage and charging for e-bicycles and mobility scooters.

Heritage and Tall Buildings

Policy S11: Historic Environment

94. This policy has been extensively altered. Additional emphasis has been placed on the need to celebrate the City's heritage and promote public enjoyment of historic spaces and buildings in ways that are inclusive and accessible. The policy encourages heritage-led placemaking, the retrofit of historic buildings and collaboration between heritage sites and other adjacent developments.

Policy HE1: Managing Change to the Historic Environment

95. The policy has been amended to require submission of statements of significance and heritage impact assessments. Specific wording has been added to reflect the wording of national policy in relation to heritage harm.
96. An additional requirement has been set out in policy for developments in the immediate setting of historic places of worship to conserve and enhance their significance. This policy addition mentions Bevis Marks Synagogue and St Paul's Cathedral as examples – two of the City's most important religious buildings.
97. Supporting text has been extensively revised to reflect these changes and best practice in conservation.

Policy HE2: Ancient Monuments and Archaeology

98. The policy has been amended to require artefacts or deposits to be preserved in-situ.

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

99. The policy has been amended to reflect requirements for heritage impact assessments, and for development in the area to contribute to pedestrian and cycle routes, including through wayfinding improvements.

Strategic Policy S12: Tall Buildings

100. The policy has been extensively amended, reflecting the approach required to comply with the London Plan and recent evidence in relation to character areas and tall building areas.
101. The first part of the policy gives a definition for tall buildings in the City. The next few sections give design guidance. The latter part of the policy sets out where tall buildings would be appropriate, and how developments should identify appropriate heights for tall buildings. Supporting text has been updated accordingly.

Strategic Policy S13: Protected Views

102. A minor amendment to the policy has been made to require development to have regard to views of the City that have been designated by other local planning authorities.
103. Extensive additions have been made to the supporting text to reflect the operation of St Paul's Heights as set out in the Protected Views SPD.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure

104. A minor amendment has been made to the policy to reference the green corridors that have been identified to link up the City's Sites of Importance for Nature Conservation (SINC).
105. Supporting text has been revised to more clearly set out the importance of open spaces and green infrastructure in the Square Mile.

Policy OS1: Protection and provision of open spaces

106. The broad approach in the policy remains as previously but wording has been revised to provide additional clarity and to emphasise the need for inclusive, accessible public open spaces. Supporting text has been revised to more clearly set out the importance of inclusive and welcoming open space.

Policy OS2: Urban greening

107. Minor changes have been made to the policy to emphasise the need for maintenance of green features. Supporting text has been shortened and clarified, with reference to new London Plan guidance on urban greening added.

Policy OS3: Biodiversity

108. Minor changes have been made to the policy to recognise that green walls may not be appropriate ways to increase biodiversity in all cases. Supporting text has been revised to reference the City Corporation's Biodiversity Action Plan.

Policy OS4: Biodiversity Net Gain

109. This is a new policy, reflecting the imminent requirement set out in legislation for development to provide net gains in biodiversity. Because of the existing low levels of biodiversity in the City, a more relevant approach seeking absolute increases (rather than a percentage uplift) has been set out in policy, supported by recent evidence.

Policy OS5: Trees

110. A minor amendment has been made to refer to the green routes that have been identified to link up the City's SINC's.

Climate Resilience

Strategic Policy S15: Climate resilience and flood risk

111. A requirement has been added for development to contribute to wider climate resilience measures. The timeline for raising flood defences has been brought forward, in line with recent evidence.

Policy CR1: Overheating and Urban Heat Island Effect

112. No amendments have been made to the policy.

Policy CR2: Flood risk

113. No amendments have been made to the policy (other than typographical changes).

Policy CR3: Sustainable Drainage Systems (SuDS)

114. No amendments have been made to the policy (other than typographical changes).

Policy CR4: Flood protection and flood defences

115. No amendments have been made to the policy. In supporting text, the timeline for raising flood defences has been brought forward, in line with recent evidence.

Circular Economy and Waste

Strategic Policy S16: Circular Economy and Waste

116. No amendments have been made to the policy (other than typographical changes). The London Plan apportionments have been updated in supporting text to most recent London Plan.

Policy CE1: Zero Waste City

117. The policy has been split and merged into policy DE1 (Sustainable Design) and policy CE2 (renumbered CE1 - Sustainable Waste Facilities and Transport).

Policy CE1: Sustainable Waste Facilities and Transport

118. No amendments have been made to the policy. Part of previous policy CE1 (Zero Waste City) and relevant supporting text have been incorporated into this policy.

Policy CE3: New waste management sites

119. A minor clarification has been made to the policy to be clear that the relevant part applies to waste facilities that generate energy from waste.

The Temples, the Thames Policy Area, and the Key Areas of Change

Policy TP1: The Temples

120. This is a new policy, replacing the previous Temples policy (HS7). It better reflects and seeks to support the functioning of the Temples as places of learning, training and collegiate facilities alongside housing and workspaces for barristers and students. The previous policy sought to retain a balance between housing and workspaces in the area; this approach no longer reflects the optimal functioning of the area as a place to support the legal profession.

121. The policy also recognises the important historic character of the Temples, encourages sensitive adaptation and accessibility improvements, and seeks opportunities to encourage improvements to the public realm and open spaces.

Strategic Policy S17: Thames Policy Area

122. The policy has been amended to emphasise the need for additional inclusive public space along the riverfront. Clarification has been given in respect of moored vessels. Supporting text has been shortened and repetition removed.

Strategic Policy S18: Blackfriars

123. The policy has been amended to support the provision of an eastern entrance to Blackfriars Station, providing access to the riverfront. Encouragement has also been given to provision of sport, leisure or recreation facilities for the area below the Blackfriars undercroft.

Strategic Policy S19: Pool of London

124. The updated policy aims to make the most of opportunities to provide ample public open spaces along the Thames riverfront, enhance pedestrian access, and optimize the use of heritage assets, with the aim of transforming riverfront into a lively and attractive destination.

Strategic Policy S20: Aldgate, Tower and Portsoken

125. The updated policy emphasises the need to deliver a more diverse mix of developments in the area and support the revitalisation of the Mansell Street Estate.

Strategic Policy S21: City Cluster

126. This policy has been extensively amended. City Cluster has been identified as one of the areas appropriate for tall building development. The revised policy emphasises the need to transform Leadenhall Market into a vibrant destination and encourages to enhance its leisure and retail offer. The policy strengthens the requirement for providing free to enter and publicly accessible elevated spaces. Policy further emphasises the need to respect the immediate setting of Bevis Marks Synagogue.

Strategic Policy S22: Fleet Street and Ludgate

127. The policy has been amended to identify Fleet Street as an area appropriate for tall buildings and emphasis the need to strengthen the retail provision along the principle shopping centre. It also highlights the need to diversify the offer by providing cultural and leisure facilities.

Strategic Policy S23: Smithfield and Barbican

128. The policy has been updated to provide greater support to the provision of hotels in appropriate locations along with leisure and retail uses. In addition, it encourages the provision of spaces suitable for other complementary uses such as start-ups, creative industries and meanwhile uses.

Strategic Policy S24: Culture Mile Implementation

129. The policy has been removed, following the wrapping up of the Culture Mile initiative.

Policy SB1: Culture Mile Impacts

130. The policy has been removed, following the wrapping up of the Culture Mile initiative. Other policies address the need to mitigate impacts of cultural, night time economy and other uses.

Strategic Policy S24: Smithfield

131. This policy has been revised to encourage the growth of the area's retail and leisure economy with a particular focus on establishing Smithfield as a leisure destination.

Strategic Policy S26: Liverpool Street Key Area of Change

132. This policy has been revised to set out area based priorities for placemaking, aiming to enhance the overall visitor experience by public realm enhancements and improving wayfinding; and connectivity to nearby local destinations.

Implementing the City Plan

Strategic Policy S27: Planning Contributions

133. This policy has been updated to include the requirement for securing contributions for cultural provision, highway and public realm enhancements.

Corporate & Strategic implications

134. The preparation of the City Plan is informed by and will contribute to the implementation of the Corporate Plan (2018-23). The City Plan will support the delivery of key Corporate priorities, along with proposals to ensure a sufficient supply of business space and complementary uses to meet future needs. Preparation of the revised City Plan is being undertaken alongside the review of

the Transport Strategy and the revised end date of the City Plan (2040) will align with the key net zero target in the Climate Action Strategy.

Financial implications

135. None.

Staff Resource implications

136. Preparation of the revised pre-submission Regulation 19 City Plan is being carried out in-house by the Development Plans Team, working alongside and supported by Development and Design colleagues in the planning service and by other services as appropriate.

Legal implications

137. There are no specific legal requirements, other than the ongoing requirement to ensure that all relevant statutory processes are complied with during production of the City Plan.

Equalities implications

138. Preparation of the City Plan has been informed by an Integrated Impact Assessment. A separate Equality Assessment is also being undertaken. Any material changes to the Plan will be subject to further Equality Assessment.

Risk implications

139. The December 2021 report to the Grand Committee identified the risks associating with preparing a revised pre-submission Regulation 19 City Plan as compared to submitting the current version for examination. The Grand Committee agreed to revise the City Plan and officers will continue to monitor and report back on any changes to the risk assessment as the project progresses.

Climate implications

140. The City Plan is one of the key mechanisms for achieving those targets in the Climate Action Strategy which relate to the Square Mile rather than the City Corporation's own operations, in particular the net zero target for the Square Mile by 2040. The inclusion of policies that seek to prioritise and incentivise the retention of existing buildings, including for offices, will further strengthen alignment with the Climate Action Strategy.

Security implications

141. There are no direct security implications.

Conclusion

142. The report sets out the significant changes proposed to policies in the City Plan 2040, taking into account recent evidence, corporate strategies and public engagement. The revised Plan sets out a sustainable approach to development in the City, with changes addressing the key issues raised during previous consultations and arising from recent evidence.

Background Papers

- None

Appendices

- Appendix 1 –City Plan 2040 (proposed submission – policy text)
[Note: Technical issues with the production of the Appendix mean it was not completed in time for publication and is therefore not incorporated within the agenda pack at this point in time.]

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