



Local Plans Sub (Planning and Transportation) Committee

Date: THURSDAY, 9 OCTOBER 2025

Time: 9.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:	Deputy Tom Sleigh (Chair)	Alderwoman Elizabeth Anne King, BEM
	Deputy John Edwards	JP
	Deputy Marianne Fredericks	Deputy Alastair Moss (Ex-Officio
	Mercy Haggerty (Ex-Officio	Member)
	Member)	Hugh Selka
	Shravan Joshi MBE	Jacqui Webster

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES FOR ABSENCE**

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

3. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman in accordance with Standing Order 26(6).

For Decision

4. **MINUTES**

To agree the public minutes and summary of the meeting held on 18 October 2023.

For Decision
(Pages 5 - 20)

5. **CITY PLAN MAIN AND ADDITIONAL MODIFICATIONS**

Report of the Executive Director, Environment.

Please note that Appendix 6 (City Plan 2040 – Main and Additional Modifications (with tracked changes)) has been published as a separate document pack.

For Decision
(Pages 21 - 118)

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

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

8. **EXCLUSION OF THE PUBLIC**

MOTION: That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

For Decision

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 COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE
Wednesday, 18 October 2023

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Room 3 - 2nd Floor West Wing, Guildhall on
Wednesday, 18 October 2023 at 1.45 pm

Present

Members:

Deputy Shravan Joshi (Chairman)
Graham Packham (Deputy Chairman)
Deputy Randall Anderson
John Edwards
Deputy Alastair Moss
Alderwoman Susan Pearson
Deputy Elizabeth King (Ex-Officio Member)

Officers:

Zoe Lewis	–	Town Clerk's Department
John Harte	-	Environment Department
Rob McNicol	–	Environment Department
Tom Nancollas	–	Environment Department
Garima Nayyar	–	Environment Department
Gwyn Richards	–	Environment Department
Michelle Rowland	–	Environment Department
Lisa Russell	–	Environment Department

1. **APOLOGIES**

Apologies for absence were received from Deputy Christopher Hayward and Deputy Edward Lord.

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

There were no declarations.

3. **MINUTES**

RESOLVED – That the public minutes of the last meeting held on 20 June 2023 be approved as a correct record.

4. **CITY PLAN 2040**

The Sub-Committee considered a report of the Planning and Development Director, which set out the direction of the City Plan and summarised the main changes to policies to reflect the findings of evidence, to take into account the engagement responses received, and to align the Plan with updated corporate strategies.

An Officer outlined the City Plan timetable stating that following the Sub-Committee's consideration of the text of the Plan, on 21 November, the Planning and Transportation Committee would consider the full plan proposed for submission to the Secretary of State. This would then be submitted to the Policy and Resources Committee followed by the Court of Common Council in January 2024. If approved, there would then be a Regulation 19 Consultation on the City Plan in February and March 2024. The Plan would then be submitted to the Secretary of State along with the consultation responses and other relevant documents in Summer 2024. There was an aim to have public examination hearings towards the end of 2024, an Inspector's report in Spring 2025 and adoption in mid-2025.

Members were informed that Officers had sought to ensure that where contents overlapped, they had been combined, with less repetition. The overall spatial strategy had remained similar to that in the previous plan. The spatial parts of the policies had been separated from the more thematic parts. This work had been informed by the work of the Sub-Committee and extensive engagement carried out over the summer with various stakeholders.

The Officer outlined the substantive changes made to each section as outlined in the Officer report and Members were invited to comment.

The following comments were made in each section:

Health, Inclusion and Safety

Strategic Policy S1 – Healthy and Inclusive City

Policy HL5

In reference to the replacement facilities being equivalent to those being replaced, a Member stated that this should be the minimum requirement.

Policy HL2

A Member raised concern that the policy previously stated that developers would be expected to install non-combustion energy technology but this had been changed and developers were expected to avoid the use of diesel power generators. He stated that this could encourage gasoline power generators. The Officer advised that environmental health colleagues would be consulted on the wording to ensure the wording did not result in negative outcomes.

Policy HL5

A Member commented that there should be an impetus on developments providing public toilets and if provided externally, the developers should be responsible for maintaining them. Concern was raised that toilets were being

provided in developments with viewing galleries but these could only be used by those with tickets. The Officer stated that this policy sought to require the provision of public toilets in major retail, leisure and transport development particularly near visitor attractions, public open space etc. There were also policies around requiring major new developments to be contributing to the life of the City e.g., cultural attractions, roof terraces and viewing galleries. The Officer stated that the provision of public toilets in the right buildings in the right locations could be a valuable addition to these facilities. Officers would consider the wording of the policies to ensure this was appropriately referenced and was being secured through appropriate schemes. The Officer stated that many of the largest developments were focussed in a particular area so appropriate locations should be considered to prevent overprovision in certain areas.

Policy HL2

A Member stated that the policy should seek to drive down local sources of Nitrogen Oxides (NOx) and particulates. A Member also commented that standby generators were required to be tested monthly and each time they entered a start-up phase which resulted in higher particulate emissions. The Chairman stated that there were difficulties setting policy on areas which were difficult to implement without legislation. A Member stated that if a development was connected to two substations it would not need a back-up generator and suggested that this could be mandated. A Member suggested that the particulates of a new development could be evaluated alongside carbon.

An Officer stated that this policy required developments to be at least air quality neutral and for major developments to maximise credits for BREAM assessments related to on-site NOx emissions. The Officer stated that the largest developments were subject to an environmental impact assessment to adopt an air quality positive approach and this had changed from being 'wherever possible' to being a requirement. There was also London Plan guidance. Members were advised that Officers would look closely at this and understand how it related to aspects such as the heating of buildings and the movement of construction materials. The Officer stated that Construction Logistics Plans were also undertaken to secure improvements. Members were informed that Officers understood Members' concerns and would take these away to ensure that a high bar was being set in relation to the air quality of new developments.

Policies HL7 and HL8

A Member stated that the word 'free' should be included in the reference on page 38 of the report to the network of outdoor sporting facilities. He also stated that there could be a reference to the possibility in some cases of combining HL7 and HL8. He commented that there were successful examples in other boroughs where adult exercise facilities had been combined with children's play

areas so parents and carers could watch their children while exercising and children could learn from seeing their parents and carers from exercising. An Officer stated that some to this would be included in the design of particular sites as schemes came forward. There was also work underway in the City to look at the potential of certain sites and this could be cross referenced in the Plan.

In response to a Member's query about whether events such as Formula 1 would be classified as recreation, an Officer stated that from a strict planning perspective, this would be considered to be a leisure type which would fall within retail and leisure.

Strategic Policy S2 - Safe and Secure City

Policy SA3

A Member stated that in relation to hostile vehicle mitigation (HVM), the words 'designed to minimise the need for HVM on the public highway' should be replaced with significantly stronger wording to strongly discourage HVM on the public highway, except from where this could not be avoided. A Member stated that there was guidance on this that the building line was never at the point where the HVM started and finished but was further forward of that and therefore there could be difficulties in managing this through policy.

The Chairman stated that the Plan was looking forward to 2040 and much could change in this time. An Officer stated that incorporating HVM measures within the design of buildings was generally the preferred approach and that if it was necessary on the public realm, this should be well designed. There were also measures that could be taken to manage the potential for HVM working in partnership outside the red line boundary and with other developers as well and this was encouraged. Officers noted the concerns raised and would look at the wording to check the balance was right.

A Member commented that the amount the developer was required to contribute should be more specific and should be 100% if connected to their building, with a lower contribution if the HVM was towards the wider area. An Officer stated that this policy was working in conjunction with other policies. There was a policy on developer contributions which identified the various aspects of financial contributions that developers would need to be making in relation to a number of policy areas including this one. The language in this policy was deliberately vague because the detail of how the cost was identified was set out in the planning obligations supplementary planning document (SPD). This gave the flexibility to update and amend that when reviewed. Where a development had an impact or could have an impact in the wider public realm, these costs were offset through contributions such as 278 agreements to improve the wider public realm. Officers would ensure that security aspects were included in this.

Housing

Strategic Policy S3 – Housing

A Member raised concern that the City Plan was until 2040 but the Housing Plan was to 2029. An Officer stated that the final year of the housing requirement was 2039-40. Before then changes in the City, might mean there would need to be a review of the City Plan but it set the framework for that time frame, bearing in mind what was known now.

A Member stated that certain buildings should be able to be converted from office to residential more easily than policy would permit. A Member informed the Sub-Committee of two office to residential conversions that had recently been granted planning permission under delegated authority. The Officer stated that Policy OF2 was a lynchpin policy. In relation to residential proposals, this policy took a more flexible approach to residential proposals than the adopted Local Plan. The policy still required proposals that would result in a loss of office and conversion to residential, to undertake a 12-month marketing exercise and for it to not be considered a strategically important office site. However, within and immediately adjacent to residential areas, it did allow the conversion of offices to residential. The Officer advised that over the last 10 years, the City had been relatively successful at supporting residential schemes on particular sites, often in older historic buildings.

A Member suggested that 7.1.6 mentioned the work done outside the City and should be moved to the front of the Housing section to make it more prominent.

The Chairman stated that the Local Plan was to set a generic perspective on the policies rather than look at individual examples. The Committee could then look at individual cases.

A Member raised concern that if the housing target was not met this could be problematic when the Plan was submitted for inspection. The Officer stated that Officers were confident about the number. It had been developed through looking at both the London Plan requirement which set out the requirement up to 2028-29 and this was 146 dwellings on average per year on average. Beyond this time period, the government's national algorithm was used for calculating housing requirements and the City was in line with this and also the GLA's housing figures which were capacity based. The London Plan stated that the City of London should be promoting office development and seeking substantial additional provision of office development. The Officer stated that if the housing target was revised upwards this could lead to a non-conformity issue with the London Plan by virtue of not providing sufficient sites for office development.

Offices

Strategic Policy 54 – Offices

Policy OF2 – A Member commented that the policy stated that the loss of office floor space would be resisted unless it could be demonstrated that the proposed development would not lead to the loss of office floorspace. He stated that this wording therefore needed amending as any alternate use other than

office would lead to the loss of floor space. An Officer stated that the wording would be considered to ensure it was clear.

Members discussed the importance of not sterilising the land and there being uses which could compromise other uses. The Chairman stated that an ecosystem of cafes, retail and other uses was important to ensure office demand did not drop away. An Officer stated that there were a number of ways that a development could compromise the potential for an office development on a site nearby e.g., there could be issues of light and overshadowing to a residential development sterilising a potentially substantial office development site. The Officer stated that the supporting text could be amended to be clearer about the bar being set and stated that the policy would not encourage the micromanagement of sites. A Member commented that the City had spent a significant sum on Elizabeth Line and the sites around the stations were attractive for Offices. Leveraging those sites for that type of activity was better value than having residential developments there. A Member commented that the policies were about the proper stewardship of space.

In response to a question from a Member about whether there should be an assessment of what a development would provide to the ecosystem of types of development included in the policy, an Officer stated that there were other parts of the plan e.g. design policies which ensured that development was contributing to the life of the city and also the inclusion of active frontages.

A Member queried whether laboratories were classified as offices. An Officer stated that certain laboratory development would be difficult to find appropriate spaces for within the square mile. These tended to be very large, secure facilities with blank frontages. There were other areas around the City that were developing sites. Whilst the City was continuing to support life sciences, there was not a focus on having laboratory developments in the City.

The Chairman stated that the inclusion of laboratory sites, would not be in line with other policies, Destination City and creating an ecosystem feeling. He commented that it was important to remain sector agnostic and although there were a lot of financial and professional services in the City, this was quite a generic area. The Chairman stated that he and the Director of Planning and Development had met with the life science industry about laboratory space. He advised that the City had a large role to play in that sector and financial support was provided out of the square mile. The Chairman also stated that there was a wide spectrum of types of laboratory sites.

Policy OF3

A Member stated the importance of temporary 'meanwhile' uses and having a policy that insisted on these to prevent the sterilisation of a site prior to the development of a site. An Officer stated that the wording of Policy OF3 had been strengthened to now state 'firm encouragement'. In addition, where a major development would affect existing ground floor or podium level active

uses, these units should be kept in active use for as long as possible prior to development taking place and cultural plans should set out how this would be achieved. Officers would push developers on this but also had to be mindful of the legislative framework.

A Member raised concern about the inclusion of cultural plan in the temporary uses without other possible temporary uses being included e.g., temporary market garden or sporting facility. The Officer stated that cultural plans could include a wide range of different uses. The word 'vibrancy' was suggested as improved terminology.

A Member suggested that the business rate change could mean business owners would cover the cost of most of the temporary use. Officers would consult the Chamberlain's Department and if appropriate would reference this as an additional incentive.

Retail

Strategic Policy S5 – Retail and active frontages

The Chairman requested that wording be included about working in partnership with the Business Improvement Districts (BIDs) to gain their perspective.

A Member queried how retail and other relevant uses would be encouraged to open at evenings and weekends particularly in areas around key attractions. The Officer stated that this could not be a requirement so would be through encouragement. He also advised that work could be undertaken with developers on their cultural plans or strategies to consider evening and weekend operation. The Officer stated that work would continue to take place with the BIDS, landowners and other partners to enrich the ground floor economy.

A Member asked whether it would be possible to discourage certain types of retail especially near St Paul's Cathedral. An Officer stated this was difficult and engagement had taken with a borough with similar issues. A range of interventions could be used, working with landowners and businesses and taking enforcement action where necessary. The Officer stated that part of the Plan was to extend the principle shopping centre frontage from Fleet Street up to the front of St Paul's Cathedral. This recognised the value these frontages played in the tourism and visitor economy. It also sent a signal to the retail industry that this was an area considered to be important locally. A Member encouraged work with the BIDs to encourage businesses to curate retail spaces. The Officer stated that any substantial owners of retail space should be thinking of curating spaces to get the right mix of retail.

In response to a Member's question about Leadenhall Market, the Officer stated that changes had been made to the principle shopping centre aspect that discussed Leadenhall Market, firmly encouraging the transformation into a

destination. Work was taking place with City Surveyors, Destination City colleagues and BIDs.

Culture and Visitors

Strategic Policy S6 – Culture and visitors

A Member stated there should be reference made to how it was expected that the demographics of the visitor mix would change. This would include more families with children. The Officer stated that Destination City colleagues were undertaking an extensive insights programme looking to secure data on who was currently visiting the City, who might visit in the future and how this could be achieved. This would be put into relevant policies at the relevant time but was not available to be put into the Plan at this time. If the work did line up with the Plan, more information could be added. The Officer added that the Plan was clear that there would be an expected increase in the amount of visitors and it was planned that this would include a wide range of people. There were a number of different policy areas, particularly the spatial ones, and a need for additional play space and visitor facilities for families had been recognised. An Officer stated that social and economic inclusivity could be woven into the Plan to reflect the City becoming a more welcoming destination for all communities.

The Chairman stated that the City Property Association (CPA) had launched their visualisation of Destination City so third parties were understanding the policies and would attract different types of people to the City. An Officer stated that the Inclusion Policy was at the front of the Plan. It was recognised that the City needed to become more inclusive. Officers would look into whether shifting demographics should be mentioned.

Infrastructure

Strategic Policy S7 – Infrastructure and Utilities

A Member suggested that new developments should be required to include a piece of tunnel under their developments so that when there were enough sites, they could be connected. An Officer stated the City Operation's Team could be consulted. There would need to be alignment with the Utility Strategy. The Member stated that the costs would be less than putting tunnels under the street.

Strategic Policy S8 – Design

The Chairman stated that many of the points raised were encompassed in this policy.

Policy DE5

A Member commented that viewing galleries were expensive for developers to install and alternative public amenities could be of value. The Officer stated that DE5 Part 3 stated that all tall buildings or major developments were required to provide free to enter publicly accessible elevated spaces which might include roof gardens, or public viewing galleries or other retail or leisure facilities to create attractive destinations for people to enjoy the City's spectacular skyline. This recognised the demand for a range of different experiences. The Officer added that the benefit of tall buildings was an opportunity for experiences at height. It did not necessarily mean the top of the building every time. This tied into the London Plan which had a requirement for viewing galleries to be considered and also the Culture policies for major developments to make a substantial contribution to culture and leisure destinations. Developers were required to look at the cultural planning of offers and look at retail and leisure facilities where appropriate.

An Officer advised that the demand was there for more viewing galleries, however it was important to have a diverse selection of offers. Often when there was a tall building next to a residential building, it was not appropriate to have a viewing gallery. An example of this was at 2-3 Finsbury Avenue had a ground floor triple height community skills training space. The Officer suggested that whilst two viewing galleries had opened in the last few months, there was a whole plethora of different elevated public areas as ground floor public realm could not be provided in the cluster due to the strategic nature of these sites.

A Member questioned whether requiring a ticket meant the viewing galleries were public amenities as they did not replace the public realm that could not be provided at ground floor level. An Officer stated that no visitors without a ticket had been turned away from the viewing galleries since they had opened. It was anticipated that when there were more viewing galleries and supply met demand, visitors to viewing galleries would not need to book.

A Member commented that the aesthetics of buildings was important and expectations should be included in the Plan. An Officer stated that the City sought the highest quality of architecture, the buildings were prominent buildings on the London skyline. Officers would look at the wording to ensure the requirement for exemplary architecture was emphasised.

A Member queried why HVM was included in the section about roof terraces. An Officer stated that HVM was only required where necessary e.g., where there was a public entrance to a roof terrace and this had the potential to turn into a busy place and create a particular vulnerability. Officers liaised with the City of London Police on this.

Policy DE8

A Member advocated the consideration of the cumulative effects of the loss of daylight and sunlight. An Officer stated that a planning advice note was being developed to cover the updated approaches to radiance and ensure that the

latest building research establishment guidance on daylight and sunlight was being reflected. Cumulative issues should be covered in this. The Officer stated that setting arbitrary time limits could result in developments delaying when they were brought forward. A Member raised concern about just having a forward-looking policy. An Officer stated that this would be included in the supplementary planning document which was likely to be presented to the Planning and Transportation Committee by the end of 2023, however work would need to be undertaken in line with BRE guidelines.

A Member commented that if public realm was lost to bollards at pavement level required for roof gardens, this was net loss to most people who moved around the area. An Officer stated that having large ground floor entrances queuing did not take place on the public highway.

Transport

Strategic Policy S9: Transport

A Member asked how the City ensured that lifts provided as part of an application were maintained and kept in use for the public to use. An Officer stated that where lifts were required as part of a planning application, they would be secured through the S106. If it was subsequently found that the lifts were not being run in accordance with this, work would be undertaken with the developer to ensure this was rectified.

In response to a Member's question about the prohibition of on-street shredding, an Officer stated that this just applied to new developments as it was not possible, within the planning system to require existing buildings to do this. In response to the Chairman's suggestion that a voluntary charter could be introduced, an Officer stated that he would raise this with transport strategy colleagues.

A Member asked about wayfinding and suggested that as most people used Smartphones rather than signage to navigate around the City, engaging with providers to ensure their apps located interesting destinations in the City should be explored. An Officer stated that discussions were taking place between transport strategy colleagues and the Destination City team and providers. Offers could look at policy to see if developers could be encouraged to engage with the providers of various different apps. A Member stated that three-dimensional signage was required for multi-dimensional public spaces. An Officer stated that this was included in Strategic Policy S10: Active travel and healthy streets. The Officer stated that wayfinding measures could include design consideration of how to reveal spaces and lighting could be used.

In response to a Member's concern about anecdotal evidence that there could be safety issues around the changing on e-scooters, an Officer stated that this level of detail would not be in the City Plan but it could be raised with transport strategy colleagues to ensure any guidance issued was clear about maintaining fire safety when e-scooters were charging.

At this point, the Chairman sought approval from the Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

Active Travel and Healthy Streets

Strategic Policy S10: Active Travel and Healthy Streets

Policy AT3

In response to a Member's concerns about discarded hire bikes, an Officer stated this could not be tackled through the City Plan as it was not a planning matter.

Heritage and Tall Buildings

Strategic Policy S11: Historic Environment

The Chairman stated that it was important not to suggest that it was right to fill the tall tower cluster area of Fleet Valley area with developments and also not to suggest that developments could not take place in an area that was outside of these areas. An Officer stated that the wording would be considered to ensure it was clear. He also stated that Officers had worked to ensure a context led approach was being taken towards development. Within the key areas of change policies, more detail had been provided about how different parts of the City might reflect their heritage and the potential of the area.

Tall Buildings

Strategic Policy S12 – Tall Buildings

There were no comments on this section.

Protected Views

Strategic Policy S13 – Protected views

There were no comments on this section.

Open Spaces and Green Infrastructure

Strategic Policy S14 – Open Spaces and Green Infrastructure

Policy OS3

The Chairman stated that the provision of new honey bees, particularly where not well managed, could have an impact on biodiversity. The Officer stated that the wording should be amended to make it clear that insect hotels for solitary bees were supported.

Climate Resilience

Strategic Policy S15 – Climate resilience and flood risk

Policy CR1

In response to a Member asking for clarification on the policy, an Officer stated that where new buildings were being developed, the impact on the inside of the building and the impact on the wider world were considered. The Officer stated that urban greening could improve the cooling within the immediate vicinity, passive ventilation had an impact on the building itself and the thermal mass of buildings could help to modify some of the fluctuations in temperature. The Officer added that this would be covered in more depth within the Sustainability SPD which also covered approaches such as communal heating, joining up to wider heat networks or sharing heat.

In response to a Member's query about asking developers to ensure they had the potential to connect to heat networks in the future, an Officer stated that extensive work had been undertaken through the Local Area Energy Plan which sat outside the planning system. This set out how energy requirements would be addressed and how these would be sustainable over the longer term. The government was also introducing a requirement for heat zoning and strongly supported heat networks as a key mechanism for delivering decarbonisation nationally.

Policy CR3

A Member commented that using semi-permeable or permeable materials rather than granite sets would absorb more water into the ground. An Officer stated that the wording could be considered to ensure the policy did not preclude the most up-to-date thinking in relation to sustainable drainage. He also stated that there was guidance around the type of materials that should be used and work could take place with transport strategy colleagues and the public realm team to ensure that these were aligned in terms of sustainable drainage.

Circular Economy and Waste

Strategic Policy S16 – Circular Economy and Waste

No comments were made on this section.

The Temples and The Thames Policy Area

Policy TP1

No comments were made on this section.

Strategic Policy S17 – The Thames Policy Area

No comments were made on this section.

Strategic Policy S18 – Blackfriars and Strategic Policy S19 – Pool of London

The Chairman stated that the two ends of the river within the City were neglected and there were no BIDS which included these areas. He stated that this could be an area for future development. A Member stated that there not being any major businesses with substantial footprint was a consequence of the area being neglected and therefore it would be difficult to establish a meaningful BID but that a BID could be transformative.

In response to a request from a Member, an Officer confirmed that the wording could be amended to include 'refurbishment' first and 'redevelopment' second.

Strategic Policy S20 – Aldgate, Tower and Portsoken and Strategic Policy S21 – City Cluster

No comments were made on this section.

Strategic Policy S22 – Fleet Street and Ludgate, Strategic Policy S23 – Smithfield and Barbican and Strategic Policy S24 – Smithfield

The Chairman stated that the neighbourhood forum had been included in the Plan.

A Member queried the reference to the culture mile and an Officer stated that this should refer to the Culture Mile BID. Officers would amend the wording accordingly.

A Member stated, that in relation to ensuring retention and improvement of pedestrian permeability, this could be difficult on Golden Lane estate as it was a private estate and so costs would be added to service charges. Officers would look at the wording in relation to this.

A Member referred to 17.8.9 – The cultural offer on Fleet Street and commented that this should state a ‘potentially’ strong cultural offer. An Officer stated the wording could be updated and that the policy recognised the heritage aspects in terms of the churches and the history of printing.

A Member queried the strength of the wording in relation to the resistance of residential development. An Officer clarified that this was to be narrowly applied to the area adjacent to the current market site or the future Museum of London so that a new residential development was not proposed immediately opposite the entrance to the new Museum of London. Officers would look at the wording to ensure it was clear. Members supported the restriction on residential development on this site as it could inhibit uses for the future Museum of London site which would be part of Destination City.

An Officer stated that it was acknowledged that there were residents already living in the area and that was part of the character of the area but this policy would avoid major additions of residential development adjacent to the Museum of London site.

In response to a Member’s comments that existing residents were used to noise from the market, a Member stated that the market did not trade on a Sunday so the area was quiet but in the future, there was a cultural opportunity and as part of Destination City, the area could become much busier at weekends.

Strategic Policy S26 – Liverpool Street

No comments were made on this section.

Economic Objective, Social Objective and Environmental Objective

The Officer outlined changes made to the first three chapters of the City Plan, Economic objective, Social objective and Environmental objective.

A Member asked that ‘sport’ be added into the objective – ‘creating new and enhanced culture, leisure and visitor attractions’. An Officer stated this could be considered.

The Chairman thanked Officers for their work in producing the City Plan. He also stated that the City Plan was at the heart of policymaking for the built environment. It also fitted into the Corporate Plan and the London Plan

In response to a Member’s question about the process going forward, an Officer stated that the City Plan would be amended following the discussion at this Local Plans Sub-Committee meeting and a full version of the City Plan would be submitted to the Planning and Transportation Committee on 21 November 2023. There could also be amendments made to technical aspects

of the plan through internal consultation and Members would be provided with a track change version so the changes could be easily seen.

The Chairman requested that to try and avoid repetition in the discussion at the Planning and Transportation Committee, the draft minutes of this Local Plans Sub-Committee should be circulated to Members of the Planning and Transportation Committee, in advance of that meeting.

A Member referred to the cross-cutting nature of the City Plan and the overlap with other policies. He stated that the work in the City Plan was a major part of Destination City. An Officer stated that these cross-cutting approaches would be highlighted at the Planning and Transportation Committee meeting. Following a request, the Officer stated that page numbers would also be referenced in the presentation at that Committee meeting.

RESOLVED: - That Officers continue to progress work on the City Plan based on Members' views.

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

There were no questions.

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

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

7. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the Local Plans Sub-Committee meeting held on 20 June 2023 and approved them as a correct record.

The meeting ended at 4.25 pm

Chairman

Contact Officer: Zoe Lewis
zoe.lewis@cityoflondon.gov.uk

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Committee(s)	Dated:
Local Plans Sub Committee Planning and Transportation Committee Policy and Resources Court of Common Council	9/10/2025 21/10/2025 13/11/2025 4/12/2025
Subject: City Plan Main and Additional Modifications	Public report: For decision
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • Provides statutory duties 	This report relates to the statutory planning function
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:	Katie Stewart, Executive Director of Environment
Report author:	Gudrun Andrews, Head of Planning Policy

Summary

The City Plan was submitted for Independent Examination in August 2024. The formal examination hearings have now concluded and a list of Main and Additional Modifications to the plan has been prepared in collaboration with the Planning Inspectors. These amendments require formal consultation for a period of six weeks. This report seeks member approval to commence this consultation and provide a City Corporation response to the matters raised within the consultation. This will then be sent back to the Planning Inspectors to be considered in their Final Report. Once the Inspector's Report has been received the City Corporation will be free to commence the governance process for adoption. The City Plan will then form part of the Development Plan for decision making purposes.

Recommendation

Members of the Local Plans Sub-committee are asked to:

- RECOMMEND approval of a six-week consultation period on the Main and Additional Modifications to the City Plan (Appendix 1 and 2), the Sustainability Appraisal Review (Appendix 3) and the changes to the Policies Map (Appendix 4)

Members of Planning and Transportation Committee are asked to:

- APPROVE a six-week consultation period on the Main and Additional Modifications to the City Plan (Appendix 1 and 2), the Sustainability Appraisal Review (Appendix 3) and the changes to the Policies Map (Appendix 4)
- DELEGATE authority to the Director of Planning and Development, in liaison with the Chair and Deputy Chair of the Planning and Transportation Committee to provide a City Corporation response to the consultation responses received

Members of Policy and Resources Committee are asked to:

- RECOMMEND to the Court of Common Council the Main and Additional Modifications to the City Plan 2040 within Appendix 1 and 2 as amendments to City Corporation corporate strategy

Main Report

Background

1. The City Plan was last brought to Planning and Transportation Committee on 31 January 2024. This report detailed the previous rounds of consultation and engagement, background evidence and the form and content of the Regulation 19 version of the City Plan. The report sought approval to consult on the Regulation 19 'Proposed Submission' version of the City Plan 2040 and to then submit the City Plan to the Secretary of State for independent examination. It also sought authorisation of the Planning and Development Director, in liaison with the Chair and Deputy Chair of the Planning and Transportation Committee, to compile a list of further changes to the City Plan in response to public representations and submit these to the Secretary of State. This report was also taken to Policy and Resources on 22 February and Court of Common Council on 7 March 2024.
2. The Regulation 19 consultation took place between 18 April and 17 June 2024 and was submitted, in line with the proposed timetable on 29 August 2024. Following submission the plan is termed 'at examination' which includes all the process including the formal hearings until the receipt of the Inspectors' Final Report. The formal hearings concluded on 12 June 2025.

Examination progress

3. The City Corporation submitted the City Plan for examination on 29 August 2024. From this point onwards the timetable is driven by the Inspectors in line with the regulations and procedures rather than the City Corporation. The role of the appointed Planning Inspectors is to determine whether the City Plan is 'sound' and 'legally compliant'.

4. The dedicated examination page at <https://www.cityoflondon.gov.uk/services/planning/planning-policy/city-plan-2040-examination-in-public> includes all the information, submissions and correspondence relating to the City Plan examination. This includes the Inspectors' Main Matters, Issues and Questions (MIQs) which were received in February 2025 and the Matter Statements prepared by the City Corporation and other parties in response. The MIQs formed the basis of the discussions at the hearing sessions.
5. The hearing sessions initially commenced with a focus on matters of legal compliance (Matter 1). As the Inspectors can only seek to address matters of soundness, any substantial issues regarding legal compliance would have arisen at this stage, potentially leading to a pause in the examination. However, no significant matters were raised, allowing the examination to proceed to matters of 'soundness'. Subsequent hearings explored the strategic priorities and spatial strategy before detailed topic-based discussions around housing, office floorspace, retail and culture. The third week focussed on heritage and tall buildings matters which attracted the greatest number of comments and participants at the hearings. The recordings of the hearing sessions are available on the examination website.
6. A series of new documents were produced by the City Corporation during the course of the hearings at the Inspectors' requests. Most notably further Heritage Impact Assessment of the proposed amendments to the tall building contours at the southern edge and the inclusion of a new Broadgate tall building area (ED-HTB36-40). All participants were invited to submit addenda to their previous matter statements to reflect this. Other additional submissions included an updated note on housing delivery and the Corporation's opening and closing statements.
7. In September officers received confirmation of the 'Main Modifications' which the Inspectors are recommending to the City Corporation to make the plan 'sound'. These modifications need to be put out to formal consultation on behalf of the Inspectors. For completeness the 'Additional' modifications which are more minor amendments, which do not relate to soundness will also be consulted upon. Only when this has been concluded and the Inspectors' Final Report received can the City Corporation proceed to adopt its plan to replace the Local Plan 2015 as the local plan for the City, at which point it gains full weight in decision-making on planning applications.

Approach to modifications

8. As highlighted above, the Planning Inspectors only have powers to address matters of soundness through the examination and a failure in relation to legal compliance in plan preparation cannot be rectified. However, a local plan can be amended on the direction of the Inspectors, and there are opportunities to put forward some suggested changes to the Inspectors during the examination process. Each potential change then needs to be agreed by the Inspectors and 'recommended' back to the Corporation by the Inspectors in their report. The

agreement of main and additional modifications is a normal part of the examination process.

9. The City Corporation has proposed changes under examination document (LD26), through Statements of Common Ground (SOCG1A, SOCG9-24), but also through the examination hearings. At the formal hearings it was made clear that any proposed changes would be subject to later member confirmation through the main modifications and adoption processes. Throughout the examination hearings members were kept informed of topics discussed through regular briefings and actions, and the sessions were recorded for future review.
10. The Inspectors have now agreed the lists of Main and Additional Modifications. These total 178 changes to the City Plan, of which 68 are considered to relate to soundness. The Main Modifications are proposed by the Inspectors without prejudice, and will remain unconfirmed until the receipt of the Inspectors' Final Report. This report seeks authorisation for the consultation to take place.
11. As the examination hearings were officially closed by the Inspectors on 12 June and the Main Modifications agreed by the Inspectors, there is no further scope to reopen the debates through further amendments to the MMs, or to propose alternative changes. The only alternative to taking forward the modifications to consultation stage would be to withdraw the plan from examination and restart the plan-making process. Given the transition period to a new plan-making system as set out in Annex 1 of the NPPF it would not be possible to commence plan-making again until late 2026. Adoption under the new approach would take approximately 30 months so adoption would not be until mid-2029.

Main Modifications

12. The Main Modifications to the City Plan are included at Appendix 1 to this report. It makes clear, with reference to the tests of soundness (justified, effective or positively prepared) why each modification is required. The Inspectors have approved these modifications (without prejudice) and are recommending these changes back to the City Corporation. The Inspectors consider the Main Modifications to be required to make the plan 'sound', ie without these changes the City Plan would be considered 'unsound' and the City Corporation could not proceed to adoption. Therefore, at this stage this list is finite and cannot be amended by the Corporation.
13. Many of the changes relate to changes to the heritage and tall buildings chapter (MM41-56), including:
 - clarifications on the need to preserve (and where possible) enhance the Conservation Areas (MM41, 42)
 - use of the St Paul's Setting Study in assessments (MM44)
 - how the Outstanding Universal Value of the Tower of London should be utilised and interpreted
 - changes to the contours at the southeastern corner of the City Cluster and to include a new tall building site at Broadgate (MM2, MM51-53, 56)- see updated Figure 15 in Appendix C.

14. A majority of the changes in Appendix 1 are as proposed post submission, or through discussions at the examination. One exception is a change proposed within Statements of Common Ground with Historic England (examination document SOCG9A) and the Bevis Marks Synagogue (SOCG24A). The Inspectors have considered this change and have informed the City Corporation that this is not required for soundness reasons as the identified heritage assets already have legislative and policy protection. They consider that the apparent elevation of the Bevis Marks Synagogue could have unintended consequences in relation to proposals relating to other designated heritage assets, with ambiguity for the decision maker. Therefore, the whole of the proposed additional text at paragraph 11.2.1a of the City Plan is no longer being taken forward as a modification. This text had been drafted as follows:

“It should be noted that the contribution that any part of the totality of a setting makes to the significance of a designated heritage asset is afforded protection by relevant legislation, national policy and Policy HE1. This would include consideration of impacts on sky space in views, where this enables aspects of their significance to be appreciated. The identification of the immediate settings of the Monument and Bevis Marks synagogue in policy is therefore intended to further strengthen their protection.”

15. Other notable Main Modifications are:

- the articulation of a ‘Vision’ for the City Plan (MM1)
- additional information relating to the expected housing completions, including within a new Appendix to the Plan (MM10-14)
- inclusion of the minimum office requirement in GIA (in addition to NIA) (MM17, 18)
- further explanation of the cultural contributions from developments of different scales (MM21)
- infrastructure provider engagement through the development process (MM23)
- exceptional circumstances where lower long-stay on-site cycle provision may be acceptable (MM38-40)

Additional Modifications

16. Other more minor ‘Additional Modifications’ have also been proposed during the examination (see Appendix 2). These do not go to the heart of soundness and include minor amendments to text or figures, correction of typographical errors or factual update only. The Inspectors have agreed that these amendments do not relate to soundness but will be consulted upon for completeness.

Consultation and procedure

17. As set out above, following submission Main Modifications can only be made on the recommendation of the Inspectors to address soundness matters.
18. Members are asked to recommend to Court of Common Council the approval of consultation on the Main Modifications to the City Plan as at Appendix 1, the Sustainability Appraisal Review (Appendix 3) and the Habitats Regulation Assessment Matrix (Appendix 5) as part of the formal examination process into soundness and legal compliance. For completeness members are also asked to approve consultation on the Additional Amendments as at Appendix 2 and the Policies Map 'Atlas of Change' (see Appendix 4) however these do not fall within the scope of the examination process. A tracked changes version of the City Plan is included in Appendix 6. The documents will then be put out to public consultation for a period of six weeks. This presents an opportunity for all interested parties, including (but not limited to) those who took part in the examination hearings to put forward their views on the implications of the changes and whether they consider the modifications to be sound and/or legally compliant.
19. The responses will then be collated and sent back to the Inspectors with a brief City Corporation response. The Inspectors will then consider the consultation responses in drawing together conclusions within their report. If the plan is then found 'sound' and legally compliant the City Corporation is then free to commence with the governance process of adoption. At that stage members will be asked to make the decision to adopt the plan including the final modifications that will be included within the Inspector's Report.

Additional appraisals

20. A Sustainability Appraisal of the Regulation 19 City Plan was undertaken as part of the preparation process. The Main Modifications have also been subject to additional Sustainability Appraisal screening and assessment to determine whether they have any significant or cumulative effects. This assessment is also included in Appendix 3 and will be subject to the six-week consultation. It concludes that the changes to the City Plan are likely to have uncertain or positive impacts. The mitigation measures included within the City Plan policies remain.
21. The City Plan is also accompanied by Habitats Regulations Assessment (HRA), which assessed the impact of policies in the City Plan on the identified European sites at Epping Forest, Lee Valley, Richmond Park and Wimbledon Common. This concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites. The main modifications propose only limited changes to the scope of the policies which are identified as having an impact upon the sites, and the mitigation measures contained within the policies as identified remain unchanged. This HRA Review Matrix is included in Appendix 5 and will be subject to the six-week consultation.

22. An Equalities Impact Assessment was also undertaken to support the City Plan. This found the impacts to be broadly positive. This is discussed in more detail below, however, it is not considered that the Main Modifications amend these positive conclusions.

Next steps

23. Following approval, the Main and Additional Modifications will be consulted upon for 6 weeks, to be concluded by the end of January 2026. The responses will be collated and sent back to the Inspectors in February 2026. The next stages will be the receipt of the Inspectors' Fact Check Report anticipated in April 2026, followed by the Final Report in May 2026.
24. Following receipt of the report the City Plan 2040 will be brought back to Planning and Transportation Committee, Policy and Resources and Court of Common Council to seek approval for adoption. Once adopted it will form part of the Development Plan for the Square Mile and will have full weight in planning decisions.

Corporate & Strategic implications

25. The preparation of the City Plan will contribute to the implementation of the Corporate Plan (2024-2029). It 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 adopted 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

26. The City Plan is a statutory function that the Corporation are required to deliver. While the many of the costs of drafting and consulting on the City Plan are met through existing budgets, additional reserve funds were made available to cover the costs of the examination hearings. As we now progress to the latter stages of plan-preparation these can again be covered through existing budgets, including the costs of the main modifications consultation. There are no immediate unfunded financial barriers to continuing the process toward plan adoption.

Resource implications

27. All work associated with the main modifications consultation 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

28. The City Plan has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. It has also been supported by additional assessments required or informed by other legislation, including the Habitats Regulations, Environment Assessment of Plans and Programmes, 2004, and the Equality Act 2010.
29. Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
30. The City Plan 2040 is a material consideration to be taken into account in determining planning applications within the Square Mile. The weight to be given to the plan will increase as it advances through main modifications consultation, Report and adoption stages. On adoption the City Plan will have full weight in decision-making in accordance with paragraph 48 of the NPPF.

Risk implications

31. Officers continually review and report on the risk assessment process associated with the preparation of the City Plan 2040. The risks of not adopting the City Plan according to this timetable would be that the City Corporation would need to continue to determine proposals in accordance with the Local Plan 2015 and the 2021 London Plan for the foreseeable future. The amount of weight to be given to these policies would depend on the degree of consistency with the National Planning Policy Framework and would likely diminish over time.

Equalities implications

32. The City Corporation has had due regard to the Public Sector Equality Duty (PSED) in its plan-preparation processes. Several policy amendments were included within the Regulation 19 version of the City Plan to take account of the impacts on protected groups and were assessed as positive within the Equality Impact Assessment (EQIA). This assessment demonstrated that the effects of the plan as a whole will be broadly positive. There are no major negative impacts as a result of the City Plan.
33. The City Corporation has undertaken a review of the Main Modifications to the policies against the conclusions of the appraisal as set out in Part 4 of the Assessment. As set out in the Sustainability Appraisal review at Appendix 3, the only significant changes to policies relate to AT3 and cycle parking and the

amendments to the tall buildings contours. These changes do not result in any change to conclusions within the EQIA.

34. The PSED is a continuing and ongoing duty. The broadly positive outcomes of the policies contained within the City Plan also apply to decision-making points in the processes to adoption.

Climate implications

35. The City Plan is one of the key mechanisms for achieving the targets in the Climate Action Strategy that relate to the Square Mile, in particular the net zero target for the Square Mile by 2040, and tackling climate resilience. Many policies in the Plan seek to address climate issues, particularly policies on sustainable development and the retention of existing buildings, including for offices.

Security implications

36. Policies in the City Plan seek to ensure the Square Mile remains resilient to security requirements, especially as new developments come forward in the City.

Conclusion

37. The report seeks authorisation for formal consultation on the Main Modifications to the City Plan 2040, as agreed with the Planning Inspectorate. It also seeks consultation on the Sustainability Appraisal Review of the Main Modifications, the Additional Modifications, and the changes to the Policies Map. The City Plan will be brought back to all committees in Summer 2026 to seek approval for adoption.

Appendices

- Appendix 1- Main Modifications
- Appendix 2- Additional Modifications
- Appendix 3- Sustainability Appraisal Review
- Appendix 4- Policies Map 'Atlas of Change'
- Appendix 5- HRA Review matrix
- Appendix 6- Tracked Changes version of the City Plan

Report author

Gudrun Andrews
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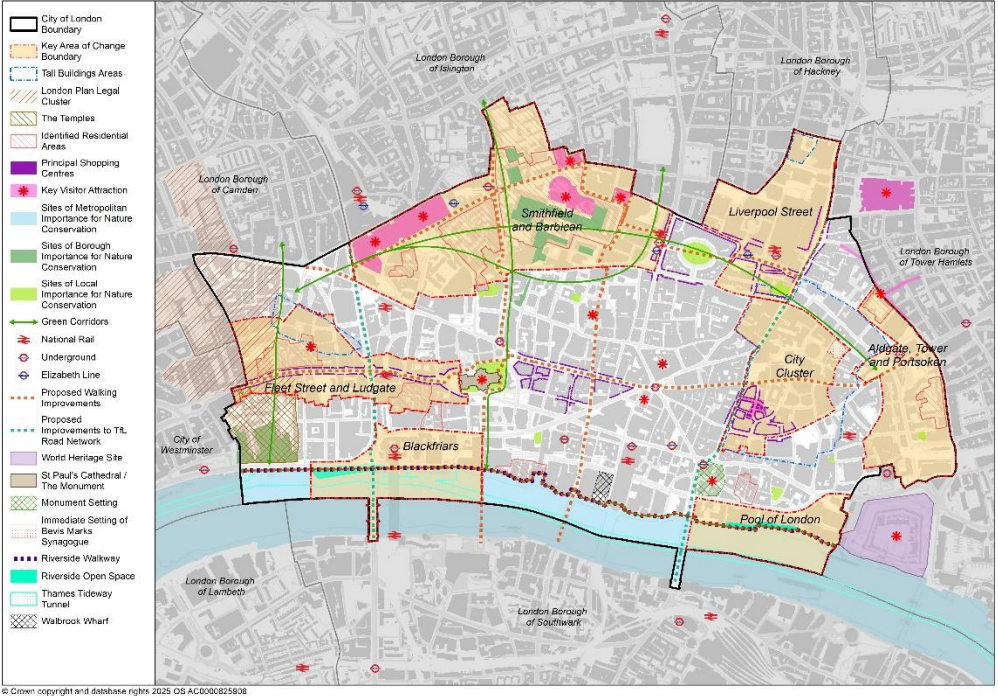
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Appendix 1 Main Modifications

Table 1: Main modifications

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	<p><u>By 2040 the City of London will have become:</u></p> <ol style="list-style-type: none">1. <u>A stronger, more vibrant and competitive economy.</u> The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business.2. <u>A 7-day-a-week destination.</u> The city’s world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn.3. <u>A more sustainable city-</u> The city has achieved its net zero aspirations and continues to lead in London’s climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors.4. <u>A more inclusive and healthier city-</u> the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all.5. <u>A place where heritage and positive change are celebrated-</u>the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	<p><i>Change to include new Broadgate Tall Building Site on Key Diagram</i></p> 
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, <u>and the Fleet Valley and the Broadgate tall building site</u> , which are identified as areas suitable for tall buildings.
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	Effective	HL2 (1) Developers will be required to effectively manage the their proposal's <u>their proposals</u> impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for <u>which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).</u>
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	Effective	HL7 (2) Existing public sport and recreational facilities will be protected in situ, unless:
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	Effective	3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	Effective	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phrase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets. <u>For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.</u>

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	Positively prepared	<p>2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City’s housing need and contributing to London’s wider housing needs by:</p> <p>a. ensuring the delivery of <u>applying the Mayor’s threshold approach of a minimum of 35% affordable housing and</u> a minimum of 50% affordable housing on public sector land;</p> <p>b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation’s satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and</p> <p>c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.</p> <p>3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.</p>
Chapter 4 Housing	4.1.12	MM9	Effective	<p>4.1.12- The City Corporation’s Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through ‘windfall’ development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</p>

Chapter	Paragraph	MM number	Main modification reason	Amended text																																				
Chapter 4 Housing	New paragraph	MM10	Effective	<i>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</i>																																				
				<u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u>																																				
				<u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u>																																				
				<u>Table 1- Housing Delivery (Source City Corporation Monitoring data)</u>																																				
				<table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr><tr><td><u>2022/23</u></td><td><u>96</u></td><td><u>Completions</u></td></tr><tr><td><u>2023/24</u></td><td><u>0</u></td><td><u>Completions</u></td></tr><tr><td><u>2024/25</u></td><td><u>29</u></td><td><u>Completions</u></td></tr><tr><td><u>2025/26</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td></td><td><u>2,116</u></td><td></td></tr></table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>	<u>2022/23</u>	<u>96</u>	<u>Completions</u>	<u>2023/24</u>	<u>0</u>	<u>Completions</u>	<u>2024/25</u>	<u>29</u>	<u>Completions</u>	<u>2025/26</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>342</u>	<u>Completions (projected)</u>		<u>2,116</u>	
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Appendix 2	New appendix	MM11	Effective	<p>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr><tr><td><u>2025/26</u></td><td><u>146</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>146</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>146</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>146</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2029/30</u></td><td><u>102</u></td><td><u>0</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2030/31</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2031/32</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2032/33</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2033/34</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2034/35</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2035/36</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2036/37</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2037/38</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2038/39</u></td><td><u>102</u></td><td><u>190</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td><u>2039/40</u></td><td><u>102</u></td><td><u>220</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td><u>Total</u></td><td><u>1,706</u></td><td><u>2,430</u></td><td></td></tr></table>	Year	Target* per annum	Units	Status	<u>2025/26</u>	<u>146</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>146</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>146</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>146</u>	<u>342</u>	<u>Completions (projected)</u>	<u>2029/30</u>	<u>102</u>	<u>0</u>	<u>Completions (projected)</u>	<u>2030/31</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2031/32</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2032/33</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2033/34</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2034/35</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2035/36</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2036/37</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2037/38</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2038/39</u>	<u>102</u>	<u>190</u>	<u>Completions (windfalls and capacity)</u>	<u>2039/40</u>	<u>102</u>	<u>220</u>	<u>Completions (windfalls and capacity)</u>	<u>Total</u>	<u>1,706</u>	<u>2,430</u>	
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Chapter 4 Housing	4.1.8	MM12	Positively prepared	4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>																																																																				
Chapter 4 Housing	4.1.10	MM13	Effective	4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (<u>an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year</u>) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...																																																																				
Chapter 4 Housing	4.1.11	MM14	Effective	4.1.11 The City Corporation’s housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.																																																																				
Chapter 4 Housing	4.1.15	MM15	Effective	4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.																																																																				

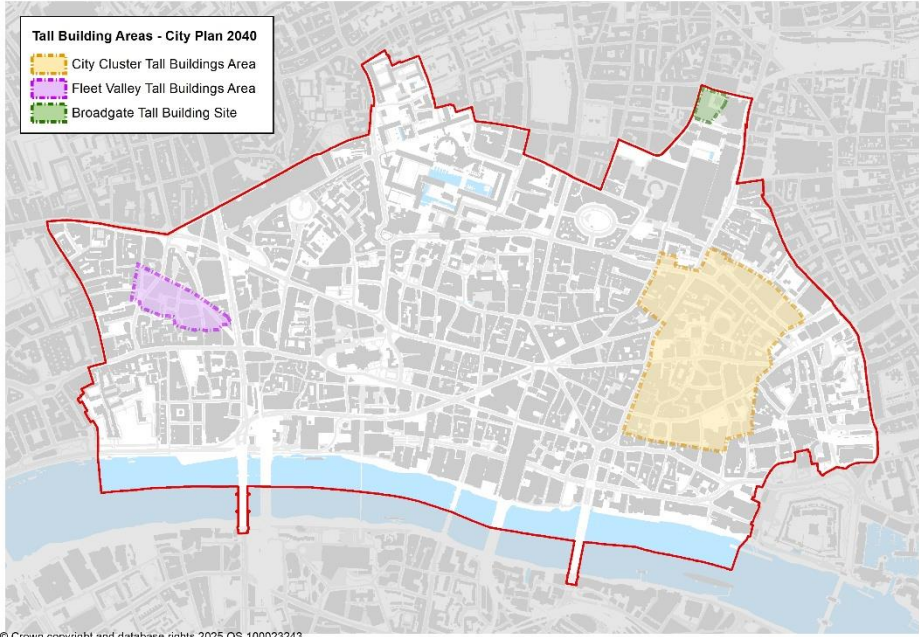
Chapter	Paragraph	MM number	Main modification reason	Amended text									
Chapter 4 Housing	HS6 (2)	MM16	Effective	HS6 (2) Proposals for PBSA should be supported by <u>and secured through a nominations agreement with an</u> identified further or higher educational institutions operating in the City of London or the CAZ.									
Chapter 5 Offices	S4 (1)	MM17	Effective	Increasing the City’s office floorspace stock by a minimum of 1,200,000 m2 <u>NIA (1,600,000 m2 GIA)</u> net during the period 2021 to 2040, phased as follows: <ul style="list-style-type: none">• 2021 – 2026 500,000m2 <u>NIA (666,666m2 GIA)</u>• 2026 – 2031 400,000m2 <u>NIA (533,333m2 GIA)</u>• 2031 – 2036 200,000m2 <u>NIA (266,666m2 GIA)</u>• 2036 – 2040 100,000m2 <u>NIA (133,333m2 GIA)</u>									
Chapter 5 Offices	5.1.1	MM18	Effective	The <u>minimum requirement of overall office floorspace target of 1,200,000m2 net internal area (or 1,600,000m2 GIA)</u> is derived from the estimated growth in office employment between 2021 and 2040...									
Chapter 5 Offices	5.3.9	MM19	Effective	5.3.9...Where a change in <u>of</u> use is proposed from office floorspace to another use,... It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area.</u>									
Chapter 7 Culture and Visitors	7.1.5	MM20	Effective	7.1.5 The City Corporation’s Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. <u>When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</u>									
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	MM21	Effective	<div><i>New paragraph 7.3.4</i></div> <div><u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u></div> <table><tr><td></td><td><u>On Site</u></td><td><u>Off Site</u></td></tr><tr><td><u>> 10,000sqm gross floorspace</u></td><td><u>Yes. Provision will be commensurate with the scale of development</u></td><td><u>Not acceptable</u></td></tr><tr><td><u>< 10,000sqm gross floorspace</u></td><td><u>Preferred. Provision will be commensurate with the scale of development</u></td><td><u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u></td></tr></table>		<u>On Site</u>	<u>Off Site</u>	<u>> 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>	<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>
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Chapter 7 Culture and Visitors	CV4 (2)	MM22	Effective	CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts									

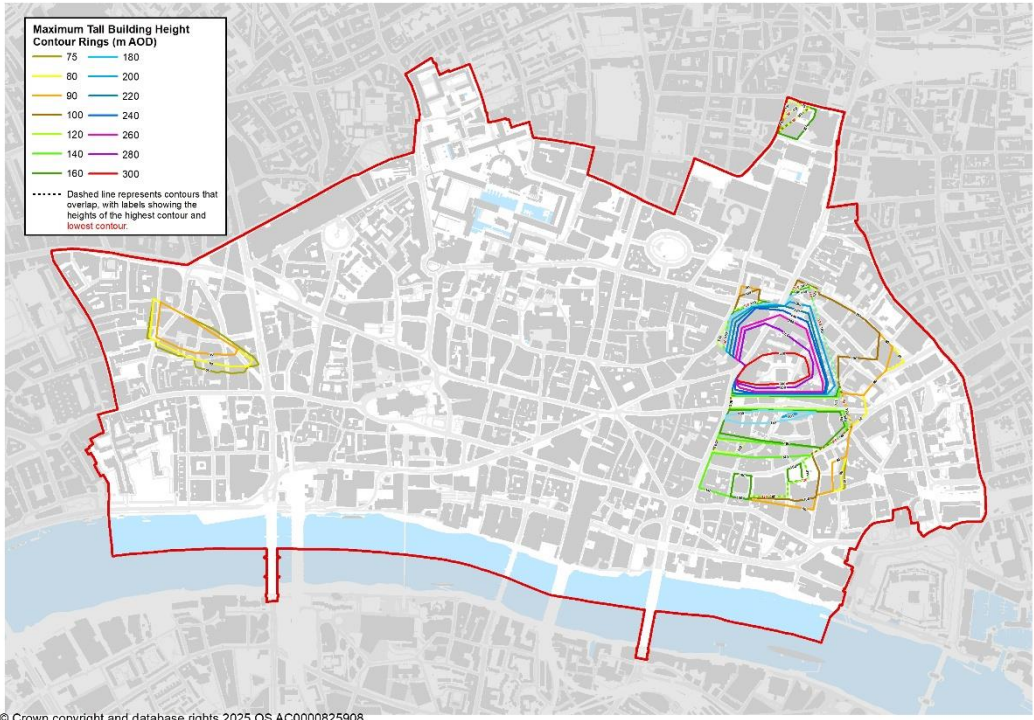
Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 8 Infrastructure	IN2	MM23	Effective	<p>1. Development must not lead to capacity or reliability issues in the surrounding area and <u>should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers</u> capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.</p> <p>2. Developers are required to demonstrate, through effective engagement with <u>provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption.</u> New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.</p> <p>3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, which may require the provision of and have explored and (where feasible) <u>provided</u> space within new developments for on-site infrastructure or off-site infrastructure upgrades.</p> <p><i>Policy clauses 2 and 3 renumbered.</i></p>
Chapter 9 Design	9.1.0	MM24	Effective	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.
Chapter 9 Design	9.1.3	MM25	Effective	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits <u>for the site, its context and the whole City</u> before considering the many wider other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.
Chapter 9 Design	9.1.5	MM27	Effective	<u>9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.</u>
Chapter 9 Design	DE1 (1)	MM28	Effective	DE1 (1) Development proposals should follow <u>adopt</u> a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting. At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.
Chapter 9 Design	DE1 (3)	MM29	Effective	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>
Chapter 9 Design	DE1 (7)	MM30	Effective	<p>7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through:</p> <ul style="list-style-type: none"> a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. <u>Retention, refurbishment, retrofit and reuse</u> Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 9 Design	DE1 (8)	MM31	Effective	<p>DE1 (8) Proposals for major development will be required to:</p> <p>a. Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). Climate resilience credit should be achieved for the waste category. <u>The adaption to climate change credit Wst 05 must be achieved in the waste category;</u></p> <p>b. Commit to achieving a minimum NABERS UK rating of 5 stars; <u>Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only);</u></p> <p>c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.</p>
Chapter 9 Design	9.2.0	MM32	Effective	<p>9.2.0 Materials – retaining <u>reducing</u> embodied carbon <u>emissions from new build construction through retrofit and in existing buildings and materials, and improving</u> resource efficiency.</p>
Chapter 9 Design	9.2.9	MM33	Effective	<p>9.2.9 For major development (<u>where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more</u>) the following information should be provided:</p> <ul style="list-style-type: none"> - A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City’s priority credits and identify any performance gaps between design and completed development. - <u>A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.</u> - An energy assessment in line with the Mayor of London’s Energy Planning Guidance - An options appraisal following the City Corporation’s Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits - An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality <u>be at least Air Quality Neutral</u>, in line with the City of London Air Quality SPD. - Details of collective infrastructure <u>and other environmental sustainability improvements for the site, its context or the City as a whole.</u> which has been incorporated to address environmental challenges. - Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan. - <u>Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation’s Carbon Options...</u>
Chapter 9 Design	9.2.9	MM34	Effective	<p>9.2.9 Extensions</p> <ul style="list-style-type: none"> • If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements. <p>For minor development</p> <ul style="list-style-type: none"> • Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice. • <u>For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.</u>
Chapter 9 Design	DE4 (3)	MM35	Effective	<p>3. Requiring all tall buildings or major developments to provide free to enter....</p>
Chapter 10 Transport	VT3 (4)	MM36	Effective	<p>4. All off-street <u>non-residential bays for</u> car parking facilities must be equipped with <u>active</u> electric vehicle charging points <u>usable from the outset.</u></p>
Chapter 10 Transport	AT1 (c)	MM37	Effective	<p><u>AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.</u></p>

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 10 Transport	AT3 (2)	MM38	Effective	AT3 (2) <u>In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations.</u> All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
Chapter 10 Transport	10.10.1	MM39	Effective	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. <u>A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints.</u> <u>This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.</u>
Chapter 10 Transport	10.10.2	MM40	Effective	<u>10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.</u> <i>Existing wording in 10.10.2 to move to 10.10.3, etc.</i>
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	Effective	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting . The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered <u>sought where appropriate</u> ;
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u> , townscape and skyline, <u>including their cumulative effects.</u>
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study <u>and the Setting Study (where appropriate)</u> to understand their site's significance and the key attributes of significance they should consider
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	Effective	11.3.8 On sites where significant archaeological artefacts <u>or features</u> are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	Effective	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted.</u>

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	Effective	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 (<u>City Cluster, Fleet Valley and Broadgate site</u>) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects both heritage significance and</u> townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and their immediate and wider settings.
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	<u>For the purposes of Policy D9 of the London Plan, the</u> The tall buildings areas identified <u>as being appropriate locations for tall buildings</u> are the City Cluster, and Fleet Valley <u>and Broadgate Tall Building Site</u> areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new</u> tall buildings, <u>particularly on sites where there is no tall building currently</u> , would be likely to <u>have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	11.5.6 The heights of the buildings in the City Cluster, and Fleet Valley <u>and Broadgate Tall Building site</u> areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both These areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	<p><i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i></p>  <p>© Crown copyright and database rights 2025 OS 100023243.</p>
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	<p>11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u>, townscape and skyline, <u>including their cumulative effects</u>.</p>
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	<p><i>New paragraph after 11.5.12 (and renumber after)</i></p> <p><u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u></p>

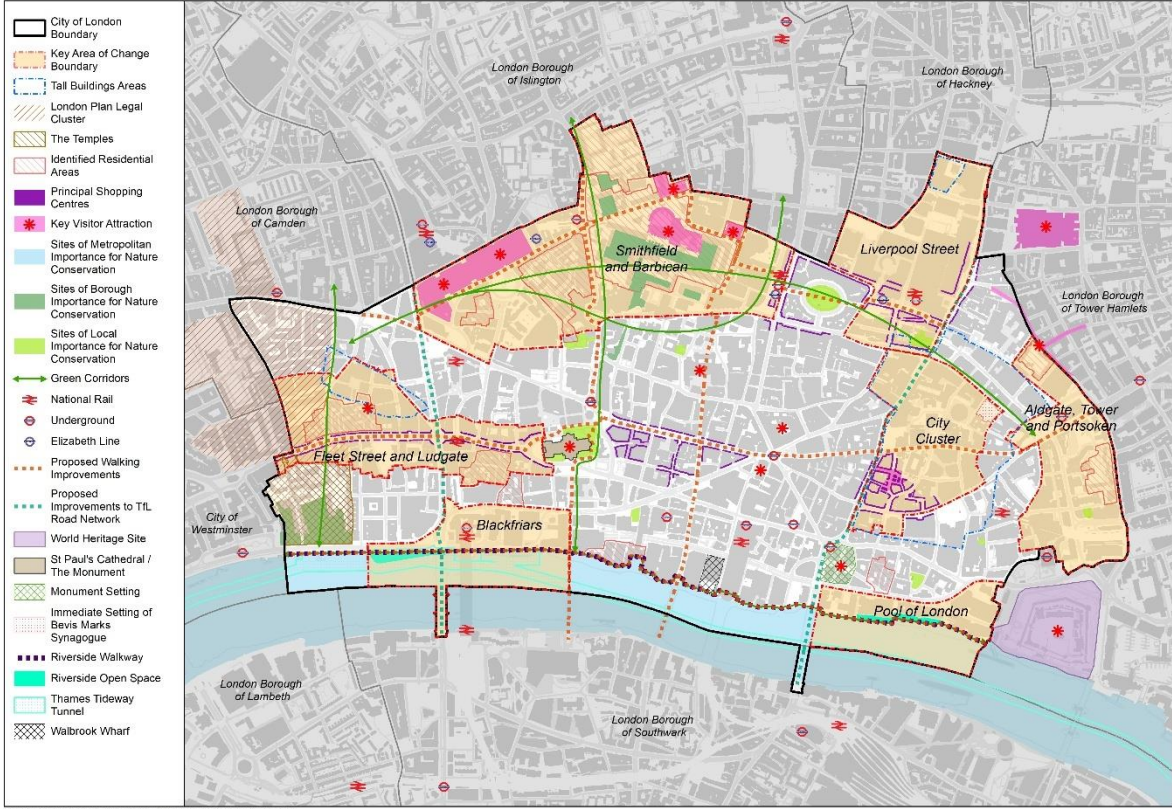
Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	<p><i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i></p> 
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	<p>2. Protecting and enhancing significant local views of St. Paul’s Cathedral, through the City Corporation’s St. Paul’s Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;</p>
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	<p>12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems. This can</u> Can take many forms and require careful design, installation and regular maintenance.</p>
Chapter 13 Climate Resilience	S15	MM59	Effective	<p><u>Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.</u></p> <ol style="list-style-type: none"> 1. <u>Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;</u> 2. <u>Development must address the impacts of the urban heat island effect;</u> 2- <u>3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;</u> 3- <u>4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and</u> 4- <u>5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.</u>
Chapter 13 Climate Resilience	13.1.2-3	MM60	Effective	<p><u>13.1.4 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u></p> <p><u>13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u></p>

Chapter	Paragraph	MM number	Main modification reason	Amended text
Chapter 13 Climate Resilience	CR1	MM61	Effective	2. Building designs should minimise any contribution to the urban heat island effect. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.
Chapter 13 Climate Resilience	13.2.2	MM62	Effective	13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted. 13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures. <u>13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.</u>
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	Effective	6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map).
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	Effective	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	Effective	9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	Effective	<u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u>
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	Effective	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u>
Chapter 15 Implementation	Policy S26	MM68	Effective	<u>(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.</u> <i>Renumber parts 2 and 3.</i>

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Appendix 2 LD33 Additional Modifications

Table 1: Additional Modifications


Chapter	Paragraph	AM Number	Amended text
Chapter 1 Strategic Priorities	1.1.0	AM1	1 <u>Vision and Strategic Priorities</u> 1.1.0 The City Plan sets out the City Corporation’s strategic priorities for planning the Square Mile,. The strategic priorities form the Vision for the City over the plan period to 2040 and set a framework for the Strategic Policies and other policies under each chapter. Together with policies that they will guide decisions on planning applications.
Chapter 1 Strategic Priorities	1.1.1	AM2	1.1.1 To help realise our vision for the Square Mile, the City Plan 2040 sets out strategic priorities that underpin the policies in the Plan. These priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners.
Chapter 1 Strategic Priorities	1.1.2	AM3	1.1.2- As set out in <u>paragraph 8 of the National Planning Policy Framework (NPPF)</u> <i>Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies</i>
Chapter 1 Strategic Priorities	1.2 Economic Objective	AM4	Delivering sustainable economic growth, including a minimum of 1.2 million sqm <u>NIA (1.6 million GIA)</u> net additional office floorspace by 2040
Chapter 2 Spatial Strategy	2	AM5	<i>Page 12- corrections to numbering to follow sequentially, eg 2.1, 2.2</i>
Chapter 2 Spatial Strategy	Figure 1	AM6	<i>Amendment to Figure 1 Key Diagram as follows:</i> <u>Green Corridors Links.</u> <i>Add reference to LB Hackney and Islington.</i> 
Chapter 3 Health, Inclusion and Safety	3.3.0	AM7	3.3.0...Due to its location at the heart of London and the density of development, the City of London <u>has historically experienced</u> high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the

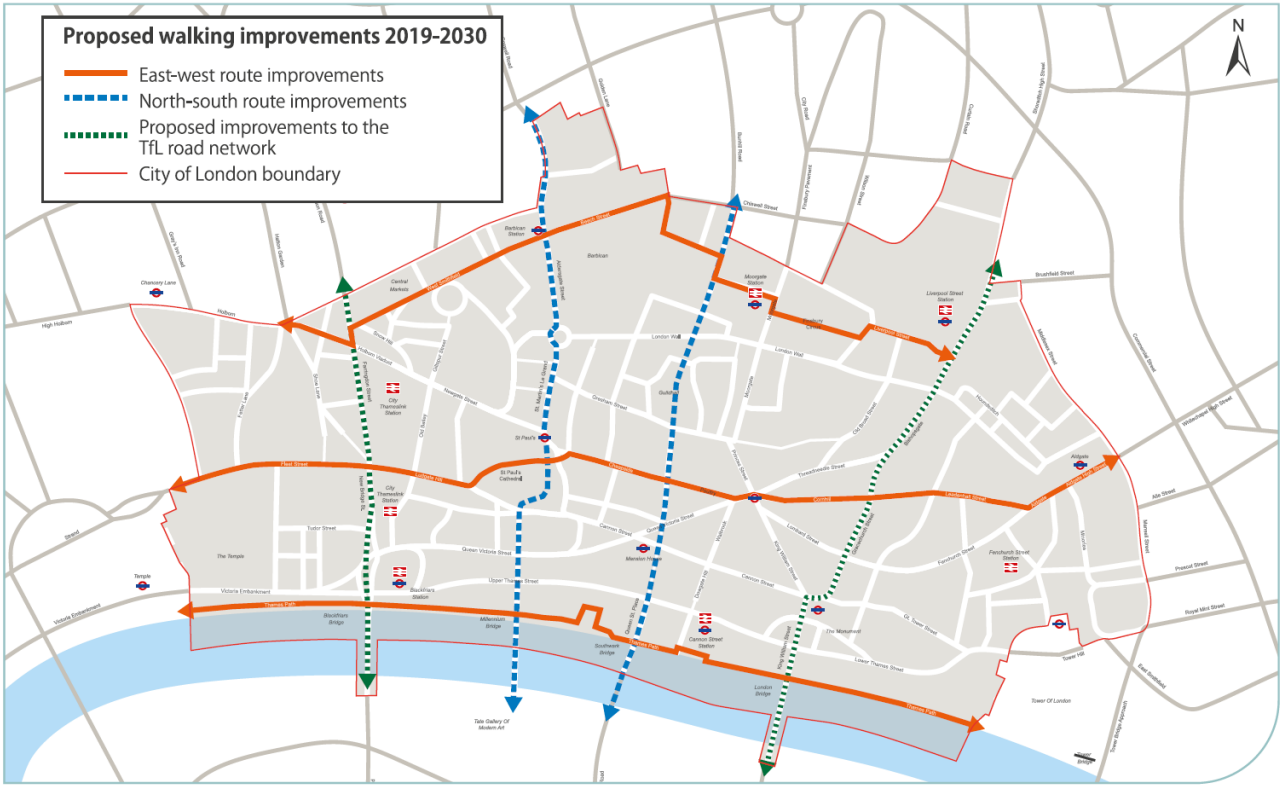
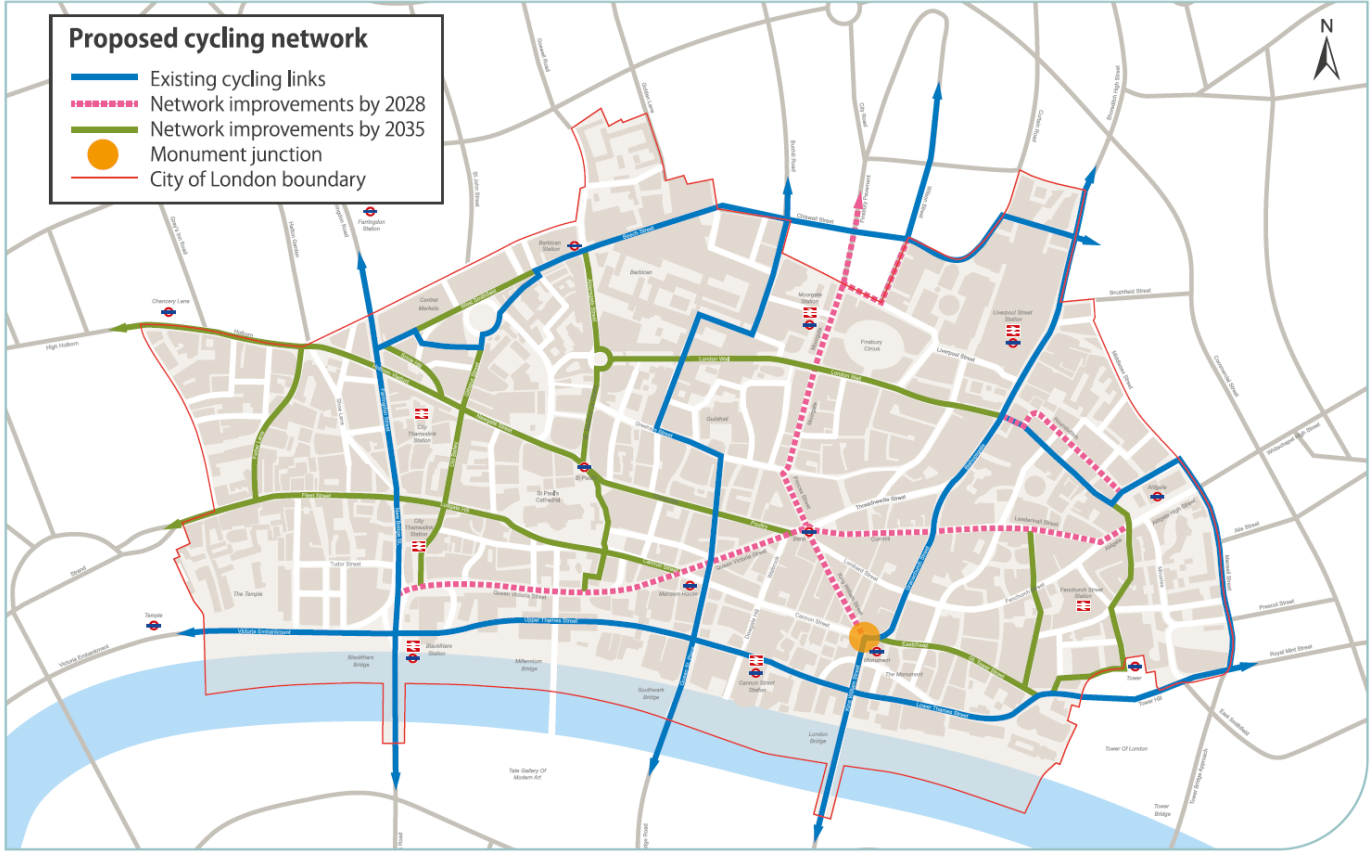
Chapter	Paragraph	AM Number	Amended text
			incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area <u>and has been implementing actions to improve air quality through its Air Quality Strategies.</u>
Chapter 3 Health, Inclusion and Safety	3.3.1	AM8	3.3.1...The City Corporation's Draft Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets <u>an annual average of 30µg/m³ NO₂ by 2030, the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO₂ by the beginning of 2025. Limits set for particulate matter (PM₁₀) are generally met, although the national target for PM_{2.5} is not met anywhere in the City. The Air Quality Strategy aims to support the Mayor of London to meet the tighter (WHO) Guidelines for PM₁₀ and PM_{2.5} by 2030".</u> The City Corporation works with a wide range of organisations to improve air quality. Although air quality has been improving, it remains at a level that still impacts on health. The City Corporation's 2025 to 2030 Air Quality Strategy sets a pathway to achieving the 2021 World Health Organisation Air Quality Guidelines for nitrogen dioxide(NO2), and particulate matter PM10 and PM2.5.
Chapter 3 Health, Inclusion and Safety	Infographic, page 23	AM9	90% of the Square Mile to meet an annual average of 30µg/m ³ for NO ₂ by 2030. 90% of the Square Mile to meet WHO air quality guidelines for NO₂ by 2025.
Chapter 3 Health, Inclusion and Safety	HL3 (1)	AM10	HL3 (1) - A noise assessment will be required where <u>noise sensitive uses may be impacted</u> there may be an impact on noise sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses such as housing, hospitals, schools, nurseries, <u>places of worship,</u> and quiet open spaces, <u>including churchyards.</u>
Chapter 3 Health, Inclusion and Safety	3.1.3	AM11	3.1.3... The City Corporation will work with the City and Hackney <u>North East London</u> Integrated Care Board and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.
Chapter 3 Health, Inclusion and Safety	<u>New paragraph</u> 3.1.5	AM12	<u>3.1.5a The City's many churches other faith communities and their buildings, including Bevis Marks Synagogue, make a highly significant contribution to the life of the City and its built environment. The churches and places of worship play an important social, faith, community and civic role, throughout the week. The church buildings and synagogue are a significant part of the architectural and historic character of the Square Mile, are visitor destinations that provide cultural experiences, as well as providing many of the City's open spaces.</u>
Chapter 3 Health, Inclusion and Safety	3.1.6	AM13	3.1.6 Outdoor spaces and the public realm, <u>including churchyards,</u> provide places for relaxation, amenity, <u>well-being</u> and leisure.....
Chapter 3 Health, Inclusion and Safety	3.4.2	AM14	3.4.2 Noise sensitive uses and developments in the City include residential developments, hotels and serviced apartments, health facilities, schools and childcare provision, <u>places of worship,</u> and certain open spaces, <u>including churchyards.</u>
Chapter 3 Health, Inclusion and Safety	HL6 (1)	AM15	HL6 (1) Requiring the provision of a range of directly accessible public toilet facilities suitable for a range of users <u>all within the community</u> including...
Chapter 3 Health, Inclusion and Safety	3.7.2	AM16	3.7.2 The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the City's CTS, and will seek their provision where appropriate in other major developments such as office and hotel schemes. <u>The provision of new publicly accessible toilets should also meet the relevant London Plan (Policy S6) and Building Regulations (Part T) requirements.</u> The scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.
Chapter 3 Health, Inclusion and Safety	HL9	AM17	HL9 - An HIA may also be required for developments considered to have particular health impacts, including those involving. <u>The impact on sensitive uses such as education, health, leisure or community facilities, places of worship, publicly accessible open space including churchyards, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent should be taken into consideration.</u>
Chapter 3 Health, Inclusion and Safety	SA2	AM18	SA2 - Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of all people, minimise the potential for over-crowding and reduce the instances of noise nuisance and antisocial behaviour, particularly in residential areas and near noise sensitive uses and developments such as health facilities, and schools, <u>places of worship and churchyards.</u>
Chapter 4 Housing	4.1.2	AM19	4.1.2...Other residential areas are located in Smithfield, the Temples...
Chapter 4 Housing	4.2.11	AM20	4.2.11 ...On public sector owned land, the higher 50% target will be applied as set out in the London Plan, <u>except where, in accordance with London Plan policy H4, there is a portfolio agreement with the Mayor of London.</u>
Chapter 4 Housing	4.2.15	AM21	2.2.15 ...Both the <u>The City's SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the Square Mile, it is considered</u> and that social rented units would <u>will often</u> most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site-by-site basis, <u>considering having regard to</u> evidence of need (as set out in the SHMA and its Supplement) in the City and London Plan requirements.

Chapter	Paragraph	AM Number	Amended text
Chapter 4 Housing	4.4.0	AM22	The net loss of existing housing units, <u>including to other residential products such as student or co-living</u> , will be resisted because of the limited opportunities to replace it in the City.
Chapter 4 Housing	HS3	AM23	The amenity of existing residents will be protected by: <u>1. Resisting</u> resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements <i>(new numbering proposed)</i>
Chapter 4 Housing	HS3	AM24	<i>Amend numbering so that the first sentence of the policy wording reads as its own clause rather than an introductory clause, ie:</i> <u>1.</u> The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements. <i>Amend numbering of clauses 1, 2 and 3 (to 2, 3 and 4) and change semicolons to full stops at the end of clauses 2 and 3.</i>
Chapter 4 Housing	HS4	AM25	1. Meets London Plan housing space standards, including outdoor space standards and amenity space for individual units; 2. Meets standards for Secured by Design or similar certification; <u>and</u> 3. Maximises opportunities for providing communal open and leisure space for residents; <u>;</u>
Chapter 4 Housing	HS6 (3)	AM26	HS6 (3) 35% of student accommodation <u>rooms on a site</u> should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
Chapter 4 Housing	4.8.3	AM27	4.8.3 Student accommodation, like all development in the Square Mile, should meet the highest standards of accessibility and inclusive design. To help achieve this, the appropriate proportions of accessible rooms should be provided, in line with guidance issued by the Greater London Authority, which advises that the relevant part of London Plan Policy E10 Part H applies to development proposals for new non-self-contained student accommodation. <u>In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.</u>
Chapter 5 Offices	5.1.2	AM28	The <u>minimum requirement</u> demand target is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central <u>figure</u> target is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
Chapter 6 Retail	RE2(3)	AM29	3. <u>New retail provision will be encouraged in active frontages and the</u> The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required.
Chapter 7 Culture and Visitors	S6	AM30	S6 ...enhance the City of London's cultural <u>infrastructure</u> ... S6 (2)a wide range of cultural <u>infrastructure</u> , <u>and</u> leisure, <u>and</u> recreation and visitor... S6 (3)...areas of cultural <u>infrastructure</u> <u>significance</u> including cultural buildings and leisure, <u>and</u> recreation <u>and</u> visitor facilities... S6 (5)...seeking opportunities to embed heritage in the cultural <u>infrastructure</u> <u>offer</u> ... S6 (7)... supports the <u>City's cultural infrastructure or businesses</u> primary business or cultural role of the City ... S6 (8)... especially in areas of night-time activity and around cultural <u>infrastructure</u> , <u>including</u> and tourist... S6 (9)...Maintaining the City's <u>cultural infrastructure</u> , <u>including</u> existing artworks...
Chapter 7 Culture and Visitors	7.1.0	AM31	7.1.0.....in the streets and informal spaces in between <u>and to recognise this the plan takes forward a 'cultural ecosystem' approach deployed in the Cultural Planning Framework.</u> The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed. This includes production in creative education, <u>workspaces, studios, livery halls and places of worship; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, performance venues and places of worship.</u> Churches and other places of worship, often open for free every day of the year, are deeply embedded in the fabric of the city and are key locations for the production and consumption of culture and provide a key role in educating <u>and understanding the history of the City and its role in the nation.</u> These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. <u>Cultural contributors are complementary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas and tourism facilities...</u>

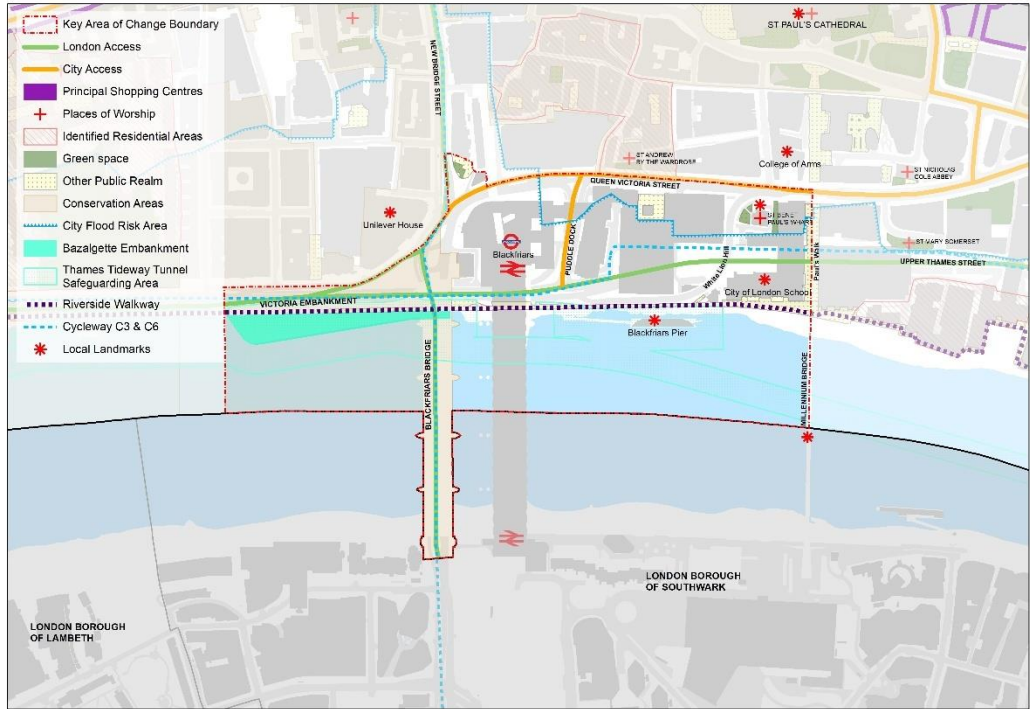
Chapter	Paragraph	AM Number	Amended text
Chapter 7 Culture and Visitors	7.1.4	AM32	7.1.4...and changes of use to protect existing <u>cultural infrastructure, and leisure, recreation and visitor, arts and cultural facilities...</u>
Chapter 7 Culture and Visitors	CV1	AM33	CV1 (Title) Protection of Existing <u>Cultural Infrastructure, and Leisure, Recreation and Visitor Arts and Cultural Facilities.</u> CV1 (1).... loss of existing <u>cultural infrastructure, and leisure, recreation and visitor, arts, and cultural facilities....</u> CV1 (2).... Proposals resulting in the loss of <u>cultural infrastructure, and leisure, recreation and visitor arts and cultural facilities....</u> ...Loss of facilities will only be permitted where this would facilitate the overall enhancement of <u>cultural, leisure, recreation or visitor, arts or cultural provision.....an alternative cultural, leisure, recreation or visitor, arts or cultural use at reasonable terms for such a use....</u>
Chapter 7 Culture and Visitors	7.2.0	AM34	7.2.0....accommodate these uses. <u>In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption.....</u>
Chapter 7 Culture and Visitors	7.2.2	AM35	7.2.2....applicants will be required to demonstrate that an existing cultural infrastructure, and leisure, recreation and visitor, arts or cultural facility has facilities have been marketed....
Chapter 7 Culture and Visitors	CV2	AM36	CV2 (Title) Policy CV2: Provision of <u>Cultural Infrastructure, Arts, Culture and Leisure, Recreation and Visitor Facilities</u> CV2 ...provide new <u>cultural infrastructure, leisure, recreation and visitor arts, cultural and leisure facilities...</u> CV2 (2)...on-site for <u>cultural infrastructure, arts, culture or leisure, recreation or visitor facilities;</u> CV2 (3)...make provision for <u>cultural infrastructure, arts, culture or leisure, recreation or visitor facilities</u> of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards <u>cultural infrastructure, arts, culture and leisure, recreation or visitor facilities and infrastructure.</u> CV2 (4)...provision of <u>cultural infrastructure, arts, culture and leisure, recreation or visitor facilities...</u>
Chapter 7 Culture and Visitors	7.3.0	AM37	7.3.0...The provision of <u>cultural infrastructure, arts, culture and leisure, recreation and visitor facilities....</u>
Chapter 7 Culture and Visitors	7.3.2	AM38	7.3.2...including the type and scale of the <u>cultural infrastructure, arts, culture or leisure, recreation or visitor offer...</u>
Chapter 7 Culture and Visitors	7.3.3	AM39	7.3.3 <u>Cultural infrastructure, Arts, culture and leisure, recreation and visitor facilities...</u>
Chapter 7 Culture and Visitors	7.3.4	AM40	7.3.4...management requirements of cultural <u>infrastructure</u> and leisure, <u>recreation or visitor facilities</u> provided in new developments prior to approval. A robust management <u>An outline plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage, to be completed in detail at application stage.</u>
Chapter 7 Culture and Visitors	CV3	AM41	CV3 The provision of facilities that meet the needs of visitors in within new cultural <u>infrastructure developments</u> and in nearby open spaces...
Chapter 7 Culture and Visitors	CV 3 (2)	AM42	<ol style="list-style-type: none"> 1. Structures and landscaping to enable children's play and provide facilities for school groups 2. <u>Facilities for school groups</u>
Chapter 7 Culture and Visitors	New paragraph 7.4.1	AM43	<i>New paragraph 7.3.4</i> <u>Churches and other places of worship are a key component of the overall visitor experience and help create the distinctive look and feel of the City. They provide many of the facilities that visitors require such as: calm green spaces to stop and rest; shelter that is free to access; cafes and toilets; and activities for school groups. They also attract visitors with a diverse cultural, historical and religious offer.</u>
Chapter 7 Culture and Visitors	CV6 (1)	AM44	CV6 (1)...public and private land <u>and buildings;</u> b. protecting existing works of art, statues, memorials and other objects of <u>communal and cultural significance;</u> ... e. <u>encouraging the use of new emerging artists, and those from under-represented groups and public art programmes</u>
Chapter 8 Infrastructure	IN2	AM45	8.3.4 Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. <u>Where capacity problems are identified, developers should work collaboratively with utility providers to find a solution.</u> S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.
Chapter 9 Design	S8 (4)	AM46	S8 (4) Delivers world class sustainable buildings that are adaptable and informed by, <u>designed with best practice</u> circular economy principles and that treat materials as a <u>valuable</u> resource.

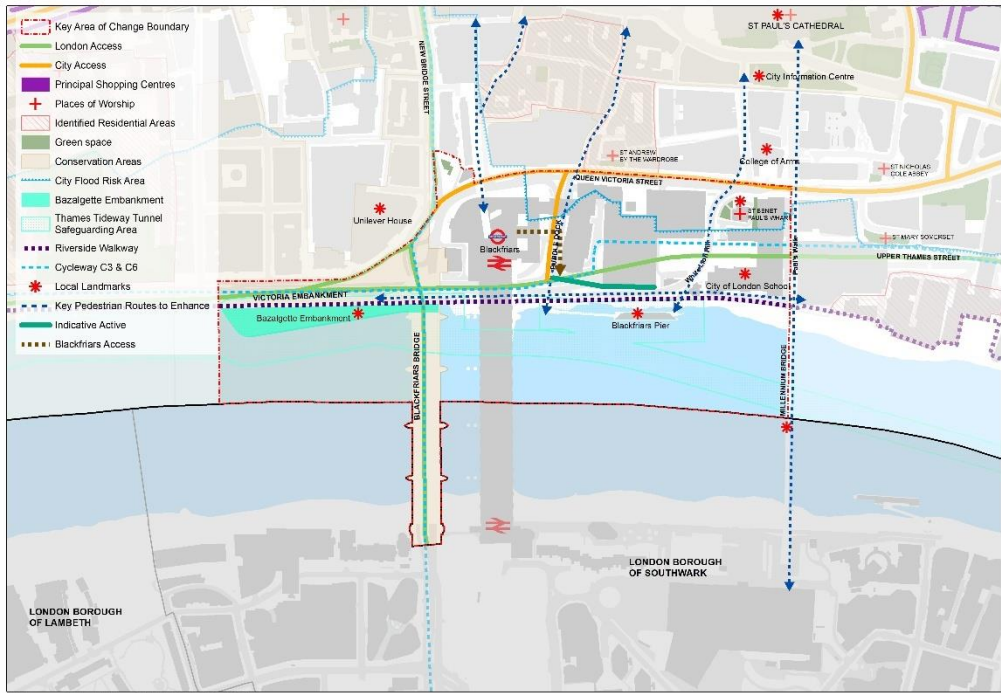
Chapter	Paragraph	AM Number	Amended text
Chapter 9 Design	S8 (5)	AM47	S8 (5) Embeds climate resilience into <u>the early design concept to</u> and contributes to the resilience of the Square Mile; and..
Chapter 9 Design	S8 (6)	AM48	S8 (6) Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial <u>embodied</u> carbon emissions.
Chapter 9 Design	S8 (8)	AM49	S8 (8) Delivers buildings and spaces that have the right <u>an appropriate</u> scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study.
Chapter 9 Design	S8 (9)	AM50	S8 (9) Optimises pedestrian movement by maximising permeability at street level, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, <u>squares</u> , courts and alleys;
Chapter 9 Design	9.1.1	AM51	9.1.1 Retrofitting existing buildings will in many cases result in lower whole lifecycle <u>upfront embodied</u> carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials.
Chapter 9 Design	DE1 (2)	AM52	DE1 (2) All major development must undertake an assessment of the <u>feasible</u> options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish to inform the most sustainable and suitable approach for the site.
Chapter 9 Design	9.2.3	AM53	9.2.3 Proposals for substantial demolition and reconstruction should have regard to the whole life carbon <u>whole life-cycle carbon</u> impact, resource and energy use, when compared to the existing building.
Chapter 9 Design	9.2.9	AM54	An energy assessment in line with the Mayor of London's Energy <u>Planning Assessment</u> Guidance.
Chapter 9 Design	DE3 (7)	AM55	DE3 (7) The need <u>Opportunities</u> to integrate high quality public art as part of the public realm design;
Chapter 9 Design	9.6.5/9.6.6	AM56	<i>New paragraph number</i> <u>9.6.6</u> Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all.
Chapter 9 Design	DE7 (1)	AM57	DE7(1) Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces <u>including churchyards</u> , is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.
Chapter 9 Design	DE8 (1)	A58	DE8(1) Development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, <u>places of worship</u> , relevant open spaces <u>including churchyards</u> and community uses. The design of lighting should be informed by the potential impacts on biodiversity and should seek to make the City a safer and more welcoming place to be for all its communities after dark.
Chapter 10 Transport	S9 (4)(h)	AM59	S9 (4)(h) Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans
Chapter 10 Transport	Figure 7	AM60	Figure 7: Temples

Chapter	Paragraph	AM Number	Amended text
			 <p>Proposed street hierarchy</p> <ul style="list-style-type: none"> --- London Access - through traffic (previously Strategic/London Distributor) — City Access (previously Borough/Local Distributor) — City of London boundary All other streets are local access <p>Figure 7: Proposed Street Hierarchy</p>
Chapter 10 Transport	10.1.6	AM61	10.1.6 The City Corporation will work with TfL <u>and Network Rail</u> to prioritise investment in accessibility improvements to underground, DLR and mainline rail stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
Chapter 10 Transport	10.2.7	AM62	10.2.7.... Applicants should <u>work with relevant stakeholders such as TfL and Network rail and</u> discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City’s specific circumstances.
Chapter 10 Transport	10.3.0 to 10.3.5	AM63	<p>10.3.0</p> <p>The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. <u>Noise from freight vehicles moving on City streets and movements within servicing bays can impact the amenity of residents and workers.</u> Efficient off-street servicing and delivery arrangements are vital to keep the City’s traffic moving and thereby avoid air pollution caused by stationary traffic.</p>
Chapter 10 Transport	10.7.4	AM64	10.7.4 Healthy Streets Plans will be developed by the City Corporation, <u>working jointly with neighbouring boroughs where appropriate,</u> to cover the following areas: City Cluster; Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.’
Chapter 10 Transport	Figure 10	AM65	Figure 10: Temples

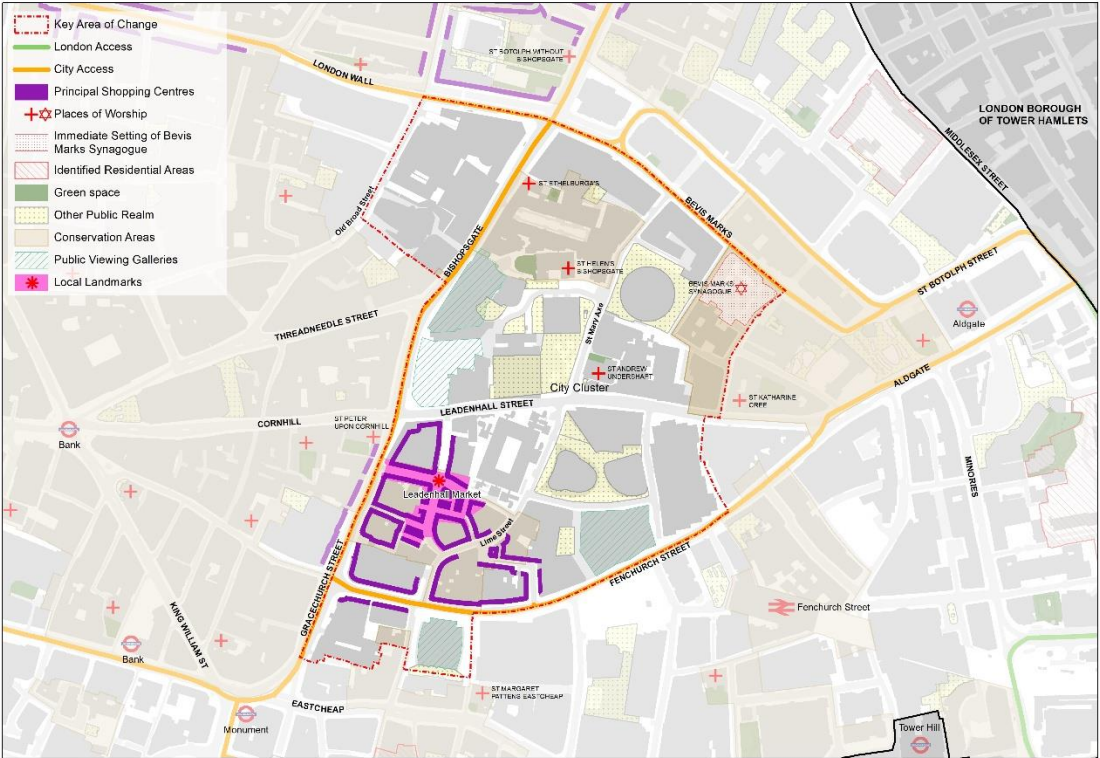
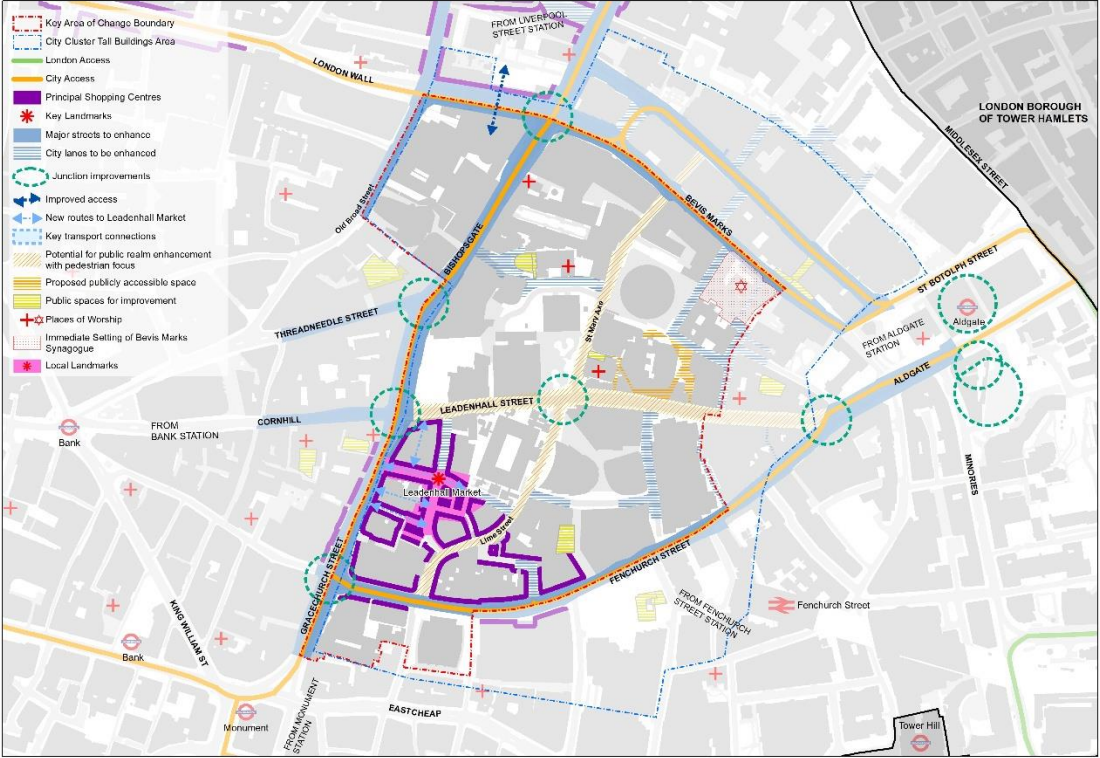
Chapter	Paragraph	AM Number	Amended text
			<div data-bbox="973 220 2169 953"><p>Proposed walking improvements 2019-2030</p><ul style="list-style-type: none">East-west route improvementsNorth-south route improvementsProposed improvements to the TFL road networkCity of London boundary</div> <p>Figure 10: Proposed walking improvements (2019-2030)</p>
Chapter 10 Transport	Figure 11	AM66	<p>Figure 11: Temples</p> <div data-bbox="973 1054 2252 1850"><p>Proposed cycling network</p><ul style="list-style-type: none">Existing cycling linksNetwork improvements by 2028Network improvements by 2035Monument junctionCity of London boundary</div> <p>Figure 11: Proposed cycling network</p>
Chapter 10 Transport	10.9.1	AM67	<p>10.9.1 “TfL Cycleways and the TfL cycle hire scheme...will be prioritised.”</p>

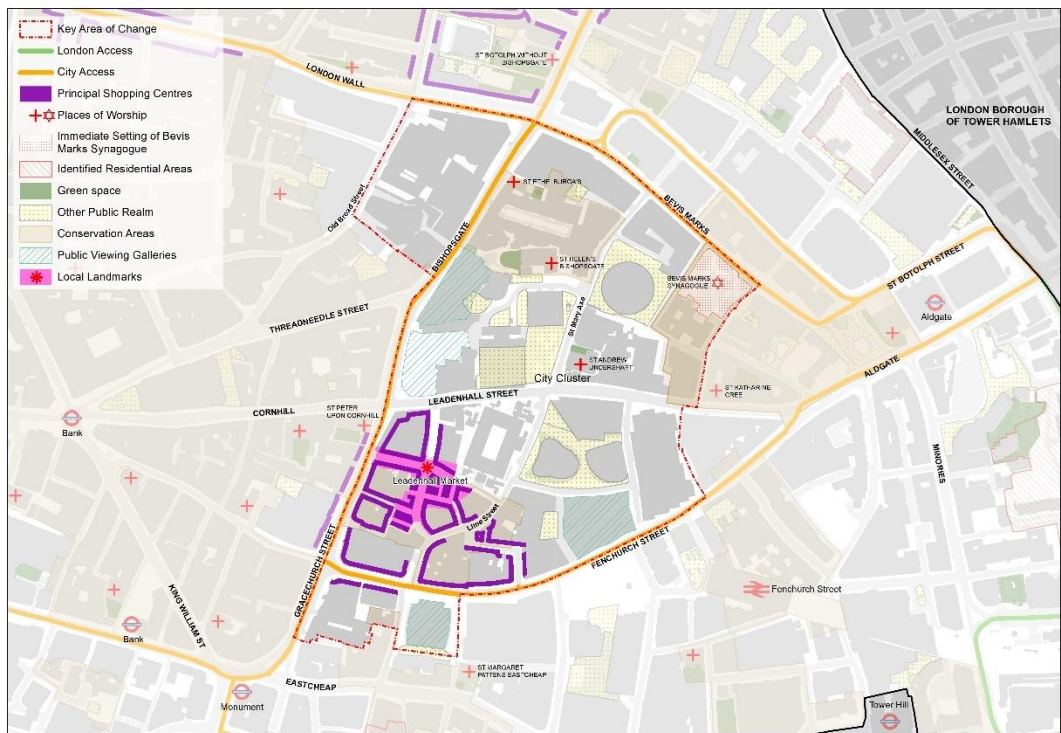
Chapter	Paragraph	AM Number	Amended text
Chapter 10 Transport	AT2	AM68	... incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards <u>or similar future standard</u> .
Chapter 10 Transport	AT3 (5)	AM69	AT3 (5) Opportunities to provide space for dockless parking <u>and TfL cycle hire docks</u> should be explored where development would create or have an impact on existing public realm.
Chapter 11 Heritage and Tall Buildings	HE1 (8)	AM70	8. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should <u>will be carefully managed to</u> preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets
Chapter 11 Heritage and Tall Buildings	S12 (5)	AM71	5. The suitability of sites for tall buildings within the identified areas <u>will depend on the sensitivity of the relevant context to such proposals. Their and their</u> design, height, scale and massing should ensure that they take into consideration local <u>preserve and enhance the significance of heritage assets and take into consideration other localised</u> factors relating to townscape character and microclimate.
Chapter 11 Heritage and Tall Buildings	11.5.1	AM72	11.5.1...These areas include relatively small parts of Smithfield, Fleet Street and the Temples...
Chapter 11 Heritage and Tall Buildings	11.5.2	AM73	The City contains many tall buildings; <u>some are located in clusters or as standalone features, and unusually some are also heritage assets</u> . In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings impart the City of London's World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan. <u>Taking into account the policies of the plan as a whole, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.</u>
Chapter 11 Heritage and Tall Buildings	11.5.13	AM74	Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings <u>including a number of conservation areas partially within the Cluster itself</u> . The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on <u>all</u> heritage assets, while recognising the juxtaposition of old and new architecture that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.
Chapter 11 – Heritage and Tall Buildings	S13	AM75	3. Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016) ; and
Chapter 11 Heritage and Tall Buildings	11.6.6 (a)	AM76	<u>A revised and updated Protected Views Supplementary Planning Document (SPD) will be produced by the City Corporation, and will be informed by both public consultation and the evidence and views gathered as part of the plan making process.</u>
Chapter 12 Open Spaces and Green Infrastructure	12.4.2	AM77	12.4.2. Barbican <u>Estate</u> , and St Alphage's Garden <u>and Barber Surgeons' Garden</u> .
Chapter 12 Open Spaces and Green Infrastructure	12.4.5	AM78	12.4.5. Biodiversity Metric (DBM) 4-9 .
Chapter 13 Climate Resilience	13.2.0	AM79	13.2.0 Development presents an opportunity to renew or adapt the existing building stock and public spaces, or provide new buildings and spaces, which will cope better with changing climate patterns. <u>Building design, including orientation, materiality, building servicing and greening can manage heat risk and address the urban heat island effect</u> . The design of buildings should reduce energy demands from cooling infrastructure, making them more resilient to higher temperatures. Measures such as urban greening and design features that provide shade and shelter can have a positive impact on or near the building, minimising the urban heat island effect (see Policy OS2).
Chapter 13 Climate Resilience	13.3.7	AM80	13.3.7 fitting non-return valves, <u>positive pump devices or similar</u> on plumbing to prevent sewer surcharge within the building.
Chapter 13 Climate Resilience	13.5.0	AM81	13.5.0 The Thames Estuary 2100 (TE2100) project plan <u>and City of London Riverside Strategy</u> recognises the need for the raising of flood defences by up to 0.5m by 2050 and in a further 0.5m <u>by 2100</u> .
Chapter 13 Climate Resilience	13.5.1	AM82	13.5.1 Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate <u>an appropriate and adequate minimum</u> set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.

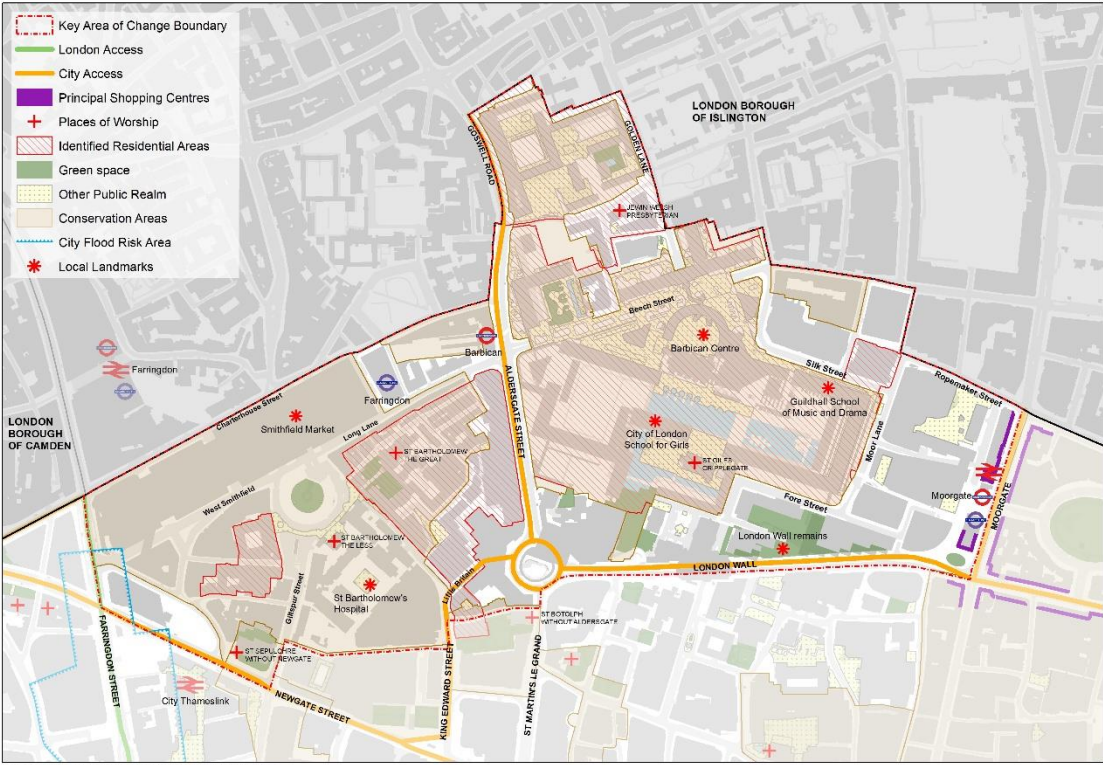
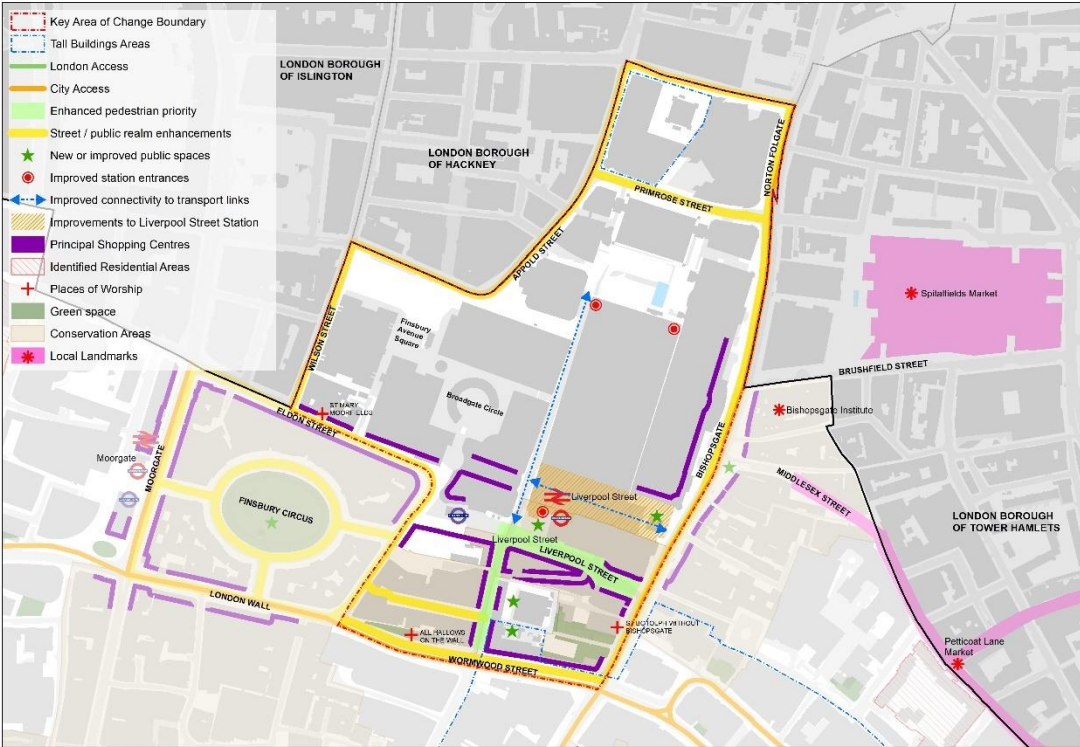
Chapter	Paragraph	AM Number	Amended text
Chapter 13 Climate Resilience	13.5.2	AM83	13.5.2 A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls <u>in line with TE2100 requirements</u> . Riparian owners are responsible for <u>the maintenance and enhancement</u> of flood defences.
Chapter 13 Climate Resilience	13.6.4	AM84	13.6.4. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Joint Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum. It will continue to work with the GLA, the Environment Agency and other waste planning authorities to improve waste planning, including where any surplus capacity is identified. <u>The City Corporation will monitor waste movements to waste locations outside London and share the data with the GLA regularly.</u>
Chapter 13 Climate Resilience	13.7.7	AM85	13.7.7 The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation, <u>the Thames Estuary Partnership</u> and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste, including the reduction of emissions from river transport, <u>and with Network Rail for any potential movement by rail.</u>
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figure 21 and Figure 22	AM86	<p><i>Amendment to Figures 21 and 22 to update the City Flood Risk Area as per latest Environment Agency data.</i></p>  <p>© Crown copyright and database rights 2025 OS AC0000625908</p>

Chapter	Paragraph	AM Number	Amended text
			 <p>© Crown copyright and database rights 2025 OS AC000625808</p>
Chapter 14 Temple, Thames Policy Area and KOAC	TP1	AM87	TP1 The City Corporation will continue to support the unique functions of the Inner and Middle Temples as places of education and training and providers of common and collegiate facilities for barristers and students, including providing professional accommodation for barristers <u>to support the Bar and maintain the Temple area.</u>
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	TP1	AM88	Within the Temple, adjustments <u>changes of use</u> between professional and residential accommodation will be permitted where it is important to the functioning or character of the Temple, or to the continuing use of their buildings.
Chapter 14 Temple, Thames Policy Area and KOAC	14.1.1	AM89	14.1.1 The Inner and Middle Temple has a strong collegiate atmosphere due to the mix of workspaces, residential, commercial and communal uses. <u>Temple Church makes a significant contribution to the history and character of the Temple.</u> This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.
Chapter 14 Temple, Thames Policy Area and KOAC	14.2.3	AM90	14.2.3 The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, <u>the Thames Estuary Partnership</u> , the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.
Chapter 14 Temple, Thames Policy Area and KOAC	14.5.2	AM91	14.5.2...while there have been significant improvements, most notably the removal of the Aldgate Gyatory and...
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figures 21-24	AM92	<i>Figures 21-24 to make reference to 'local landmarks' rather than 'key landmarks' and to show the following churches:</i> <ul style="list-style-type: none">• <i>St Mary Somerset, Upper Thames Street – Figures 21 and 22 (S18 Blackfriars)</i>• <i>St Dunstan-in-the-East, St Dunstan's Hill – Figures 23 and 24 (S19 Pool of London)</i>• <i>St Botolph without Bishopsgate – Figures 27 and 28 (S21 City Cluster)</i>

Chapter	Paragraph	AM Number	Amended text
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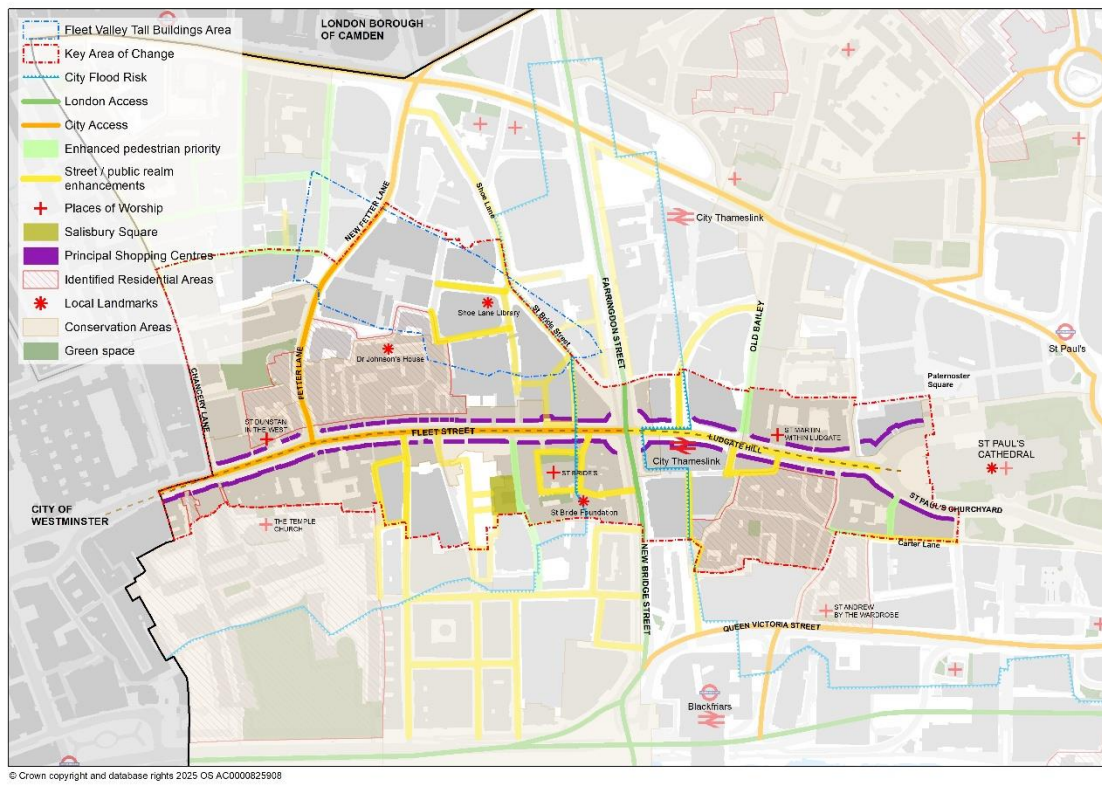
Chapter	Paragraph	AM Number	Amended text
			<div><p>© Crown copyright and database rights 2025 OS AC0000825908</p></div> <div><p>© Crown copyright and database rights 2025 OS AC0000825908</p></div>
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 27	AM93	Revise Figure 27: Fenchurch Street station is mislabeled as Cannon Street station

Chapter	Paragraph	AM Number	Amended text
			
Chapter 14 Temple, Thames Policy Area and KOAC	14.7.1	AM94	14.7.1 The area is an established legal cluster, focused on the Temples in the City...
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (2)	AM95	2. Ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, <u>and enhancements to wayfinding, legibility and accessibility in the Barbican area</u> whilst seeking to preserve privacy, security and noise abatement for residents and businesses;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (9)	AM96	9 . Supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (8)	AM97	8. Requiring improvements to pedestrian and cycle routes for all within and through the north of the City, <u>including through improvements to wayfinding</u> ;
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (11)	AM98	11. Encouraging a diverse leisure, retail, food and beverage offer, particularly along <u>Long Lane routes</u> between the London Museum and the Barbican;
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.2	AM99	14.8.2 A Neighbourhood Area and Neighbourhood Forum for the Barbican and Golden Lane area were designated by the City Corporation on 18 July 2023. <u>The Forum is in the process of preparing a Neighbourhood Plan for the designated neighbourhood area.</u>
Chapter 14 Temple, Thames Policy Area and KOAC	14.8.7	AM100	14.8.7 ... <u>and will work closely with the Culture Mile BID to deliver public realm and cultural activation.</u>
Chapter 14 Temple, Thames Policy Area and KOAC	Figure 31	AM101	<i>Figure 31- Error correction in location of open space on Moor Lane</i>

Chapter	Paragraph	AM Number	Amended text
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Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25 (10)	AM102	10. Improving Transforming the overall user experience, <u>permeability</u> , accessibility and capacity of Liverpool Street Station, <u>and its surroundings in support of its role as a key element of national infrastructure and gateway to the City of London and driver of economic growth</u> , including enhancing step free access and improving entry points...
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	Figure 34	AM103	<i>Add the Broadgate Tall Building Site</i>  <p>© Crown copyright and database rights 2025 OS AC0000825908</p>

Chapter	Paragraph	AM Number	Amended text
Chapter 15 Implementation	15.2.2	AM104	15.2.2 In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security <u>will be assessed on a site-by-site basis, in liaison with the City of London Police, particularly within and in close proximity to measures in the City Cluster</u> , in line with the policies set out in this Plan.
Glossary		AM105	<p><u>City Landmarks</u></p> <ul style="list-style-type: none"> • <u>Cannon Street Station (towers)</u> • <u>Central Criminal Court (dome), Old Bailey</u> • <u>Guildhall (roof and flèche), Guildhall Yard</u> • <u>Former Port of London Authority Building (tower), 10 Trinity Square</u> • <u>Royal Exchange (Tower)</u> • <u>Great Arthur House, Golden Lane Estate</u> • <u>Barbican Towers</u> <p><u>Strategic Landmarks within the City</u></p> <ul style="list-style-type: none"> • <u>St Paul's Cathedral</u> • <u>The Monument</u>
Glossary	n/a	AM106	<u>Neighbourhood Forum</u> - a group which has been designated under the neighbourhood planning process for a specific designated neighbourhood area. A neighbourhood forum has the ability to prepare a Neighbourhood Plan. It is a statutory consultee on planning applications and depending on the status of the Neighbourhood Plan, will be consulted on the allocation of a proportion of Neighbourhood CIL receipts for applications permitted within its area.
Glossary	n/a	AM107	<u>Wider Environmental Sustainability benefits</u> - measures related to minimising carbon emissions or improving climate resilience that make a significant contribution towards the wider environmental sustainability of the City, going beyond what would otherwise be expected.
Appendices	n/a	AM108	<i>In the Table of Contents and within the section.</i> Appendices Appendices
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change		AM109	<i>Amend Figures 25, 26, 29, 30, 33 to make reference to 'local landmarks' rather than 'key landmarks'</i>

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Appendix 3- City Plan 2040: SA Addendum

September 2025

Introduction to this document

This SA addendum considers and assesses proposed changes made to the plan, known as Main Modifications which are considered necessary for soundness. It supplements the SA of the City Plan, January 2024: <https://www.cityoflondon.gov.uk/assets/Services-Environment/SA-Main-Report-Reg-19b.pdf>

This has been prepared to accompany the consultation on the Main and Additional modifications in December to January 2026.

Stage 1- Screening of Main Modifications to the City Plan 2040

All the modifications made to the draft City Plan 2040 have been screened to consider which changes need to be assessed in the tables below. Additional modifications are automatically screened out because by their nature they cannot make a material change to the plan's policies and therefore would not change any effects identified in the assessment.

The screening includes three broad outcomes:

- Further assessment is not considered necessary as this relates to a factual change or update.
- Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
- Further assessment required as the amendments relate to a change in the policy requirements (which may include the detailed policy text or the policy application text).

Further detail is provided against each main modification giving reasons for each conclusion reached.

Where further assessment is identified as being required this was included in the updated policy assessments in Section 2. The changes were then assessed against each sustainability objective and then the cumulative impacts.

Table 1- Screening of Main Modifications

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	<p>By 2040 the City of London will have become:</p> <ol style="list-style-type: none"> 1. A stronger, more vibrant and competitive economy. The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. A 7-day-a-week destination. The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. A more sustainable city- The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. A more inclusive and healthier city- the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. A place where heritage and positive change are celebrated-the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape. 	Further assessment is not considered necessary as the amendments add further detail to the vision, rather than amend the aims and objectives of the plan and therefore would not change the effects already identified in the assessment.
Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	<i>Change to include new Broadgate Tall Building Site on Key Diagram</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, and the Fleet Valley <u>and the Broadgate tall building site</u> , which are identified as areas suitable for tall buildings.	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	Effective	HL2 (1) Developers will be required to effectively manage the their proposal's impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	Effective	HL7 (2) Existing public sport and recreational facilities will be protected in situ, unless:	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	Effective	3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	Effective	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets. <u>For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	Positively prepared	2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of <u>applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land</u> ; b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale. 3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment																																				
Chapter 4 Housing	4.1.12	MM9	Effective	4.1.12- The City Corporation’s Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through ‘windfall’ development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.																																				
Chapter 4 Housing	New paragraph	MM10	Effective	<p><i>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</i></p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 2- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr><tr><td><u>2022/23</u></td><td><u>96</u></td><td><u>Completions</u></td></tr><tr><td><u>2023/24</u></td><td><u>0</u></td><td><u>Completions</u></td></tr><tr><td><u>2024/25</u></td><td><u>29</u></td><td><u>Completions</u></td></tr><tr><td><u>2025/26</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td></td><td><u>2,116</u></td><td></td></tr></table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>	<u>2022/23</u>	<u>96</u>	<u>Completions</u>	<u>2023/24</u>	<u>0</u>	<u>Completions</u>	<u>2024/25</u>	<u>29</u>	<u>Completions</u>	<u>2025/26</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>342</u>	<u>Completions (projected)</u>		<u>2,116</u>		Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.
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Appendix 2	New appendix	MM11	Effective	<p>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr><tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr><tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr><tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr><tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr><tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr><tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr><tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr><tr><td>Total</td><td>1,706</td><td>2,430</td><td></td></tr></table>	Year	Target* per annum	Units	Status	2025/26	146	41	Completions (projected)	2026/27	146	97	Completions (projected)	2027/28	146	580	Completions (projected)	2028/29	146	342	Completions (projected)	2029/30	102	0	Completions (projected)	2030/31	102	120	Completions (windfalls)	2031/32	102	120	Completions (windfalls)	2032/33	102	120	Completions (windfalls)	2033/34	102	120	Completions (windfalls)	2034/35	102	120	Completions (windfalls)	2035/36	102	120	Completions (windfalls)	2036/37	102	120	Completions (windfalls)	2037/38	102	120	Completions (windfalls)	2038/39	102	190	Completions (windfalls and capacity)	2039/40	102	220	Completions (windfalls and capacity)	Total	1,706	2,430		Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.
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Chapter 4 Housing	4.1.8	MM12	Positively prepared	<p>4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u></p>	Further assessment is not considered necessary as the amendments provide further clarity rather to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.																																																																				
Chapter 4 Housing	4.1.10	MM13	Effective	<p>4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...</p>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.																																																																				

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 4 Housing	4.1.11	MM14	Effective	4.1.11 The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	4.1.15	MM15	Effective	4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	HS6 (2)	MM16	Effective	HS6 (2) Proposals for PBSA should be supported by <u>and secured through a nominations agreement with an</u> identified further or higher educational institutions operating in the City of London or the CAZ.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change clarifies the London Plan approach.
Chapter 5 Offices	S4 (1)	MM17	Effective	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 <u>NIA (1,600,000 m2 GIA)</u> net during the period 2021 to 2040, phased as follows: <ul style="list-style-type: none"> • 2021 – 2026 500,000m2 <u>NIA (666,666m2 GIA)</u> • 2026 – 2031 400,000m2 <u>NIA (533,333m2 GIA)</u> • 2031 – 2036 200,000m2 <u>NIA (266,666m2 GIA)</u> • 2036 – 2040 100,000m2 <u>NIA (133,333m2 GIA)</u> 	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.1.1	MM18	Effective	The minimum requirement of overall office floorspace target of 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040...	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.3.9	MM19	Effective	5.3.9...Where a change in <u>of</u> use is proposed from office floorspace to another use,... It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment									
Chapter 7 Culture and Visitors	7.1.5	MM20	Effective	7.1.5 The City Corporation’s Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. <u>When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to the CPF, and do not change the policy requirements, therefore would not change the effects previously assessed.									
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	MM21	Effective	<p><i>New paragraph 7.3.4</i></p> <p><u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u></p> <table><tr><td></td><td><u>On Site</u></td><td><u>Off Site</u></td></tr><tr><td><u>> 10,000sqm gross floorspace</u></td><td><u>Yes. Provision will be commensurate with the scale of development</u></td><td><u>Not acceptable</u></td></tr><tr><td><u>< 10,000sqm gross floorspace</u></td><td><u>Preferred. Provision will be commensurate with the scale of development</u></td><td><u>Yes if a specific project has been agreed. Provision can be through a direct intervention to support the project or through a financial contribution. See paragraph 7.3.5, financial contribution can be pooled.</u></td></tr></table>		<u>On Site</u>	<u>Off Site</u>	<u>> 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>	<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been agreed. Provision can be through a direct intervention to support the project or through a financial contribution. See paragraph 7.3.5, financial contribution can be pooled.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to scale, and do not change the policy requirements, therefore would not change the effects previously assessed.
	<u>On Site</u>	<u>Off Site</u>												
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<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been agreed. Provision can be through a direct intervention to support the project or through a financial contribution. See paragraph 7.3.5, financial contribution can be pooled.</u>												
Chapter 7 Culture and Visitors	CV4 (2)	MM22	Effective	CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.									
Chapter 8 Infrastructure	IN2	MM23	Effective	<p>1. Development must not lead to capacity or reliability issues in the surrounding area and <u>should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers</u> capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.</p> <p>2. Developers are required to demonstrate, through effective engagement with <u>provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.</u></p> <p>3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers <u>to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, which may require the provision of</u> and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades.</p> <p><i>Policy clauses 2 and 3 renumbered.</i></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change provides clarity through reference to separate statutory regime covering the sewerage and water supply network, to ensure responsibilities for developers and infrastructure providers are made clear.									

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 9 Design	9.1.0	MM24	Effective	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.3	MM25	Effective	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits for the site, <u>its context and the whole City</u> before considering the many wider other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.1.5	MM27	Effective	9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (1)	MM28	Effective	DE1 (1) Development proposals should follow <u>adopt</u> a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting. <u>At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (3)	MM29	Effective	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to whole life carbon assessments and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (7)	MM30	Effective	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. <u>Retention, refurbishment, retrofit and reuse</u> Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 9 Design	DE1 (8)	MM31	Effective	<p>DE1 (8) Proposals for major development will be required to:</p> <p>a. Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the waste category;</p> <p>b. Commit to achieving a minimum NABERS UK rating of 5 stars; Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only);</p> <p>c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.</p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.0	MM32	Effective	<p>9.2.0 Materials – retaining <u>reducing embodied carbon emissions from new build construction through retrofit and in-existing buildings and materials, and improving</u> resource efficiency.</p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.9	MM33	Effective	<p>9.2.9 For major development <u>(where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more)</u> the following information should be provided:</p> <ul style="list-style-type: none"> - A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City’s priority credits and identify any performance gaps between design and completed development. - <u>A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.</u> - An energy assessment in line with the Mayor of London’s Energy Planning Guidance - An options appraisal following the City Corporation’s Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits - An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality <u>be at least Air Quality Neutral</u>, in line with the City of London Air Quality SPD. - <u>Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole, which has been incorporated to address environmental challenges.</u> - Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan. - <u>Whole life-cycle (WLC)</u> carbon assessments in line with the London Plan Guidance and City Corporation’s Carbon Options... 	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 9 Design	9.2.9	MM34	Effective	<p>9.2.9 Extensions</p> <p>• If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements.</p> <p>For minor development</p> <ul style="list-style-type: none"> • Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice. • <u>For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.</u> 	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	DE4 (3)	MM35	Effective	3. Requiring all tall buildings or major developments to provide free to enter....	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	VT3 (4)	MM36	Effective	4. All off-street <u>non-residential bays for</u> car parking facilities must be equipped with <u>active</u> electric vehicle charging points <u>usable from the outset.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT1 (c)	MM37	Effective	<u>AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT3 (2)	MM38	Effective	AT3 (2) <u>In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations.</u> All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 10 Transport	10.10.1	MM39	Effective	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. <u>A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints.</u> <u>This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.</u>	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 10 Transport	10.10.2	MM40	Effective	<u>10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.</u> <i>Existing wording in 10.10.2 to move to 10.10.3, etc.</i>	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	Effective	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting . The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered <u>sought where appropriate</u> ;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u> , townscape and skyline, <u>including their cumulative effects</u> .	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	The City Corporation’s Character Areas Study provides an overview of the City’s overall significance including a Statement of Significance for key strategic assets, like St Paul’s Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>Many aspects of the St Paul’s Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study <u>and the Setting Study (where appropriate)</u> to understand their site’s significance and the key attributes of significance they should consider	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements, instead reflecting how Setting Study will be utilised. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	Effective	11.3.8 On sites where significant archaeological artefacts <u>or features</u> are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	Effective	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	Effective	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 (<u>City Cluster, Fleet Valley and Broadgate site</u>) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects both heritage significance and</u> townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and their immediate and wider settings.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	For the purposes of Policy D9 of the London Plan, the The tall buildings areas identified as being appropriate locations for <u>tall buildings</u> are the City Cluster, and Fleet Valley and Broadgate Tall Building Site areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new tall buildings, particularly on sites where there is no tall building currently,</u> would be likely to <u>have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	11.5.6 The heights of the buildings in the City Cluster, and Fleet Valley and Broadgate Tall Building site areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both These areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	<i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u>	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	<i>New paragraph after 11.5.12 (and renumber after)</i> <u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u>	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	<i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site and amendments to the contours at SE corner of City Cluster. Note- assessed under the Key Diagram change.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	2. Protecting and enhancing significant local views of St. Paul’s Cathedral, through the City Corporation’s St. Paul’s Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems. This can</u> can take many forms and require careful design, installation and regular maintenance.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	S15	MM59	Effective	<u>Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.</u> <ol style="list-style-type: none"> 1. <u>Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;</u> 2. <u>Development must address the impacts of the urban heat island effect;</u> 2. <u>3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;</u> 3. <u>4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and</u> 4. <u>5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.</u> 	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to over-heating. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	13.1.2-3	MM60	Effective	<u>13.1.4 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u> <u>13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	CR1	MM61	Effective	2. Building designs should minimise any contribution to the urban heat island effect. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 13 Climate Resilience	13.2.2	MM62	Effective	<p>13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</p> <p>13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</p> <p><u>13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.</u></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	Effective	6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map).	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	Effective	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	Effective	9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	Effective	<u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	Effective	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.
Chapter 15 Implementation	Policy S26	MM68	Effective	<u>(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.</u> <i>Renumber parts 2 and 3.</i>	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

The above process has identified the need for further appraisal of the following policies and their supporting text:

- Policy AT3 Cycle Parking
- Policy S12 Tall Buildings
- Key Diagram (other Figures) - identification of new Tall Building site at Broadgate and contour amendments at SE corner of City Cluster

Stage 2- Updated policy assessments

The amendments to the plan identified as having potential implications for the assessment are listed below. The submission policy assessment has been included alongside that with amendments. The commentary sets out the implications for the change on each sustainability objective.

Interpretation of results: Keys

This appraisal shows the changes to the plan under the MMs against each of the sustainability objectives of the SA. It reproduces the information from the initial appraisal and utilises the same key to highlight any changes to the assessment as a result. Where a change from the previous assessment is identified this is identified as a change through ‘C’.

Key from 2024 Sustainability Appraisal:

	Impact of implementing policy	Response to SA assessment
↑	Significant positive effect	Consider whether further enhancement is possible
↑	Positive effect	Consider whether further enhancement is possible
↕	Uncertain effect	Consider policy wording changes and/or mitigation and monitoring
↑↓	Both positive and negative effect (minor rather than significant)	Consider policy wording changes and/or mitigation and monitoring
↓	Negative effect	Consider policy changes and/or mitigation
↓	Significant negative effect	Consider changing the policy
-	Negligible effect	

2025 Key

SP	Strong positive effect
P	Positive effect
N	Negative effect
P/N	Both positive and negative effects
U	Uncertain effect
C	Change to previous effect

Modification Assessment 1- Policy AT3: Cycle Parking

Main Modification numbers: MM38-40.

Sets out circumstances where cycle provision below the London Plan standards may be acceptable, including where extensive basement excavation would be required to meet the standard, with embodied carbon implications. Change highlights that where applicable this will be secured through S106 and will be proportionate to the under-provision. Sets out temporary use of cycle provision for other uses may also be acceptable where a lack of demand has been identified, to be monitored through Travel Plans.

Table 3- Policy AT3 Cycle Parking

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P/N	P			P	P			P			P		SA identifies effects of draft policy in relation to: <ul style="list-style-type: none"> Facilitating active travel reduces emissions from vehicles. Provision of conveniently located, easily accessible, safe and secure changing facilities and cycle parking encourages active travel. Reduces space for offices but attracts City workers. Keeps streets clear for short-stay cycle parking. Provides secure cycle storage – reduced opportunity for theft. Cargo bikes making deliveries could cause congestion on pavements. Could mention facilities needed for folding bikes and scooters. Need monitoring of cycle parking use to check whether space continues to be available for cycle parking
Submission policy with modifications	P	U	P			P	P			U			U		Reduced cycle parking provision could have some further positive effects through reduction of embodied carbon in development through reduced basement excavation and throughout the course of the development’s lifetime. As demand for cycle parking may fluctuate it could have impacts on active travel uptake or involve congestion within the public realm from on-street cycle parking. Use of space for other economic functions could have some positive impacts on the economy.
Commentary	C	C								C			C		Changes to the assessment identified the following changes- <ul style="list-style-type: none"> Economic growth- potentially positive Built environment and public realm - uncertain Transport and movement - uncertain Health- uncertain

Modification Assessment 2- Broadgate tall building site

Main Modification numbers: MM2, MM3, MM52-53, MM56

Introduces a new tall building site at Broadgate and contour changes at the SE corner of the City Cluster. To be inserted into the Key Diagram and Figures 14 and 15. Reference to this site also to be added to Section 2.1, S12 (1), paragraph 11.5.4, 11.5.6

Table 4- Key Diagram and other changes for new Broadgate tall building site

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA		P		U											<p>The assessment identifies potential effects on two objectives with the following:</p> <ul style="list-style-type: none"> Tall buildings will be focused in the City Cluster and Fleet valley, which are identified as areas suitable for tall buildings. Managing the location of tall buildings improves the quality and appearance of the built environment, whilst also protecting views
Submission policy with modifications	P	P		P/N											<p>Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Given the extensive Strategic Views Impact Assessment and Heritage Impact Assessment testing, the additional identification and SE contour changes are not expected to amend the previous assessment in relation to effects on the built environment, public realm or heritage assets.</p>
Commentary	C			C											<p>Changes to the assessment identified the following change-</p> <ul style="list-style-type: none"> Economic growth- potentially positive

Modification Assessment 3- Policy S12 Tall Buildings

Main Modification numbers: MM48-51, MM54-55

Changes to Policy S12 relate to:

- Specific reference to the new Broadgate tall building site within part 2) and the supporting text at 11.5.4 and 11.5.6 as being 'suitable for a tall building'
- Part 3) to make reference to the design to respect heritage significance and their settings
- Making explicit that new tall buildings outside the identified locations are likely to have significant impacts on heritage assets
- Making clear that the existence of a tall building on a site outside the identified locations is likely to be a material consideration in planning decisions, and that retrofitting may be appropriate subject to meeting other policy requirements
- To make clear the City Corporations expectations and use of models and visualisations in relation to the historic environment and their cumulative impacts

Table 5- Policy S12 Tall Buildings

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P	P	P		P		P		P		P	P		<p>SA identifies effects of draft policy in relation to:</p> <ul style="list-style-type: none"> • Constraints on development of tall buildings could reduce the City's economic growth potential. Policy S12 encourages tall buildings in areas identified as appropriate, while also identifying areas where tall buildings would be inappropriate, including areas covered by strategic and local views. • Additional constraints on development of tall buildings could reduce economic growth but the backdrops to St Paul's Cathedral and the Tower of London is already protected by Local View Management Framework views so the impact is likely to be limited. • Managing the location of tall buildings improves the quality and appearance of the built environment with consideration given to the City's skyline • Tall buildings must have regard to the character and amenity of their surroundings, including the relationship with existing and consented tall buildings. • Policy applies with the Civil Aviation Authority's maximum height limit of tall buildings for the safety of international flights. 6. Tall buildings must have regard to the significance of heritage assets and their immediate and wider settings. • National and international impact – protects outstanding universal value of UNESCO World Heritage Site. • Integrating development within the existing context, taking into account form, mass, and height, to enhance the overall townscape character. • Policy seeks to protect the public realm from environmental impacts and ensure safe and comfortable levels of wind shear, daylight and sunlight, solar glare, solar convergence, overshadowing. • Policy looks to protect existing open spaces while providing new spaces inside and at the top of buildings. • Promotes accessible building design which will improve the inclusivity of the City. • Policy seeks to improve public realm, with active frontages at ground level and adequate space between buildings to provide a positive pedestrian experience. • Consideration of the views of the city designated by other Local Planning Authorities will promote consistency in preserving protected views. • Achieve exemplar standard of architectural quality, making a positive contribution to the townscape character. • Active frontages at ground floor level to contribute towards a positive pedestrian experience

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission policy with modifications	P	P	P	P/N		P		P		P		P	P		Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Although additional wording sets out additional protection for heritage assets and their consideration in relation to tall buildings, the plan seeks to minimise the potential for harm; consideration of any harm will still be required on relevant applications and heritage assets and their setting have protections in both other Development Plan policies and legislation.
Commentary	C			C											Changes to the assessment identified the following change- <ul style="list-style-type: none">Economic growth- potentially positive

Cumulative impacts

The cumulative impacts of all the policy modifications have also been assessed against each objective.

Objective	AT3	Key Diagram	S12	Commentary	Mitigation
Economic Growth	P	P	P	Changes in combination are likely to lead to additional floorspace dedicated to economic development within the city. This will have a likely positive effect on economic development objective.	None required.
Built environment and public realm	U			Potential flexibility in cycle parking standards could have some uncertain impacts on public realm depending on the uptake of cycling, other modes of travel and capacity of the provision on street and within the development.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required.
Safe environment and crime reduction					
Heritage Assets		P/N	P/N	Changes to the locations identified as suitable for tall buildings to include a new site at Broadgate and amendments at the SE corner have potential for some positive and negative impacts on heritage assets.	Policy requires use of models, assessment of impacts on individual heritage assets on a site by site basis
Water Management					
Environmental protection					
Climate mitigation and resilience					
Open Spaces					
Biodiversity and urban greening					
Transport and movement	U			Changes to provision of cycle parking could have uncertain impacts on transport and movement.	Other policies relate to supporting healthy streets approaches.
Housing					
Social and cultural facilities					
Health	U			Provision of cycle parking has potentially uncertain impacts on health, depending on the uptake of active travel modes as a result.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required. Other policies relate to health and wellbeing.
Education					

Mitigation measures

In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce any negative effects. Some of the effects of policy changes are uncertain

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Appendix 4 Atlas of Change: City Plan 2040

As part of the Local Plan suite of documents, the Policies Map provides illustrations of site-specific policies. The current policies map was adopted in 2015 and can be accessed here – [City of London Web Mapping](#)

The Atlas of Change provides an illustrative tool to set out where changes across the City have occurred during the Examination in Public process. The Atlas of Change in addition to the Policies Maps Changes (LD11) prepared in March 2024, includes all of the proposed changes to the policies maps. Once the Local Plan has been found sound through an Examination in Public, the Corporation will adopt and publish a new Policies Map to support the new local plan.

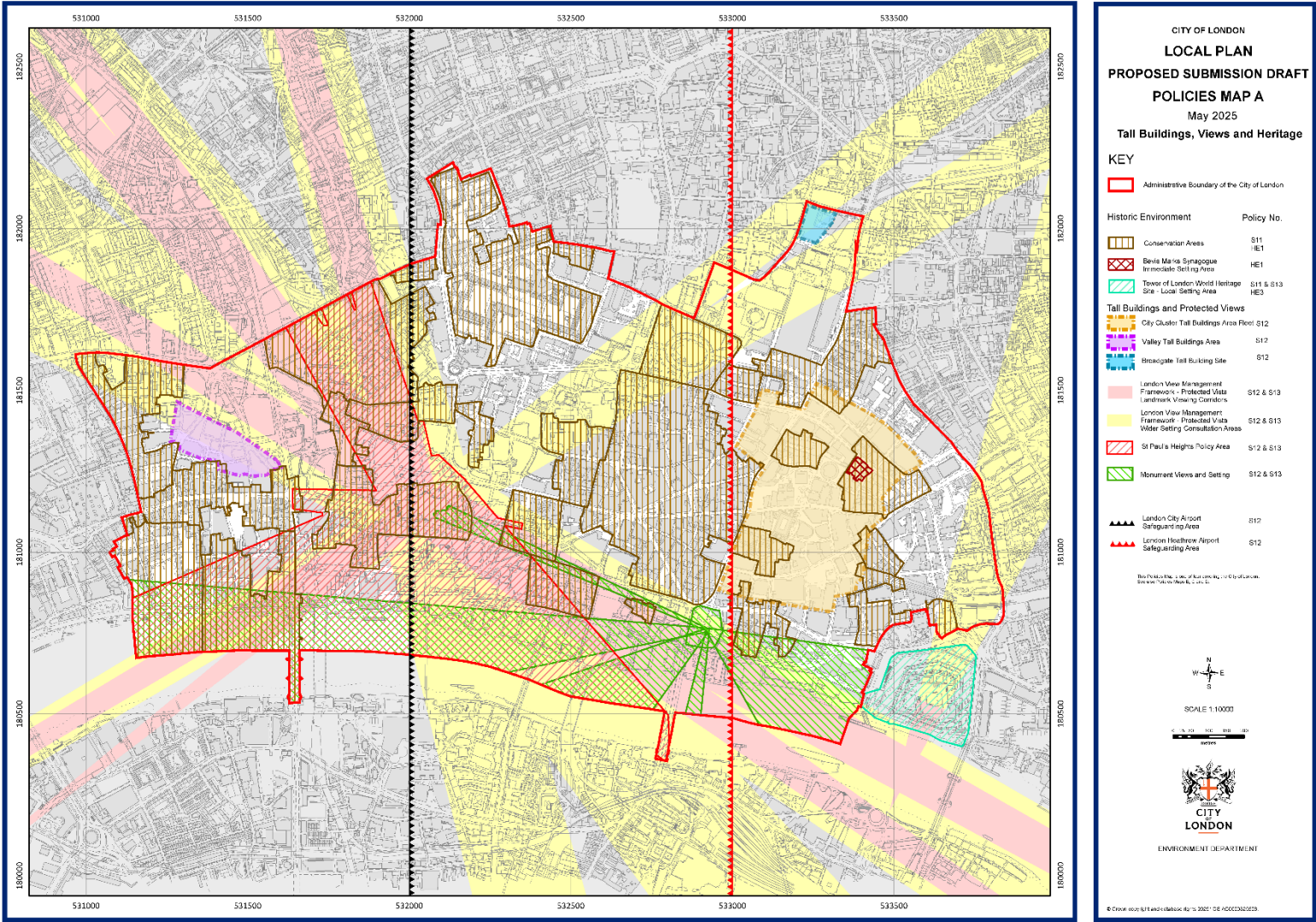
The proposed amendments to the Policies Map are limited to Tall Buildings.

The table below sets out each of the amendments proposed to be made to the Policies Maps as proposed. Following the table below, the mapping provided sets out spatially where proposed changes would be made.

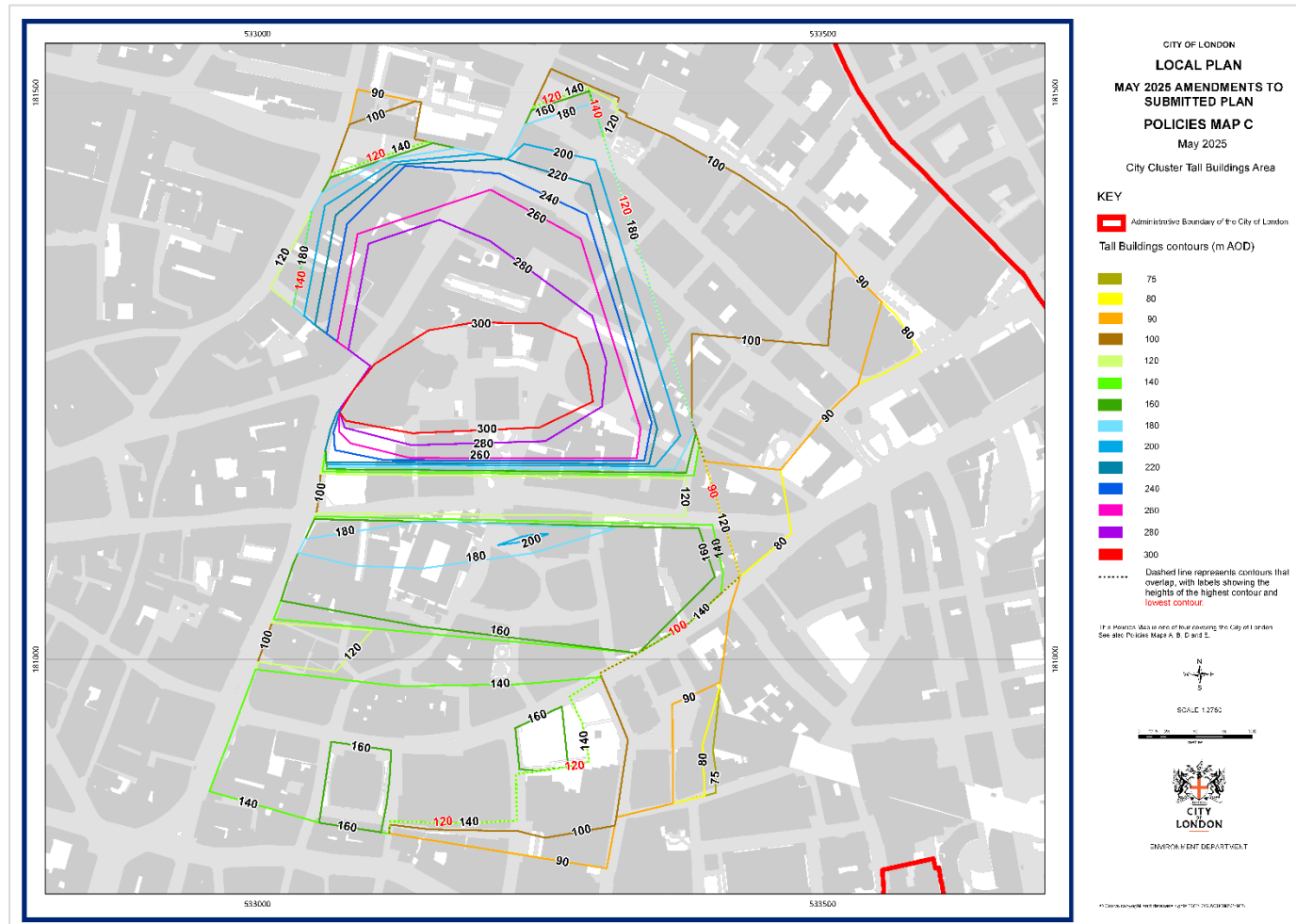
Change no.	Topic	Address	Change	Reason	Map reference
PM1	Tall buildings	Broadwalk House	<i>Create a new Broadgate Tall Building Site on the tall building layer</i>	<i>New tall building site was promoted during the Examination</i>	Policies Map A
PM2	Tall buildings	1-2 Minster Court	<i>Minor amendments over this site to create the heights of between 90m –100m and 100m-120m.</i>	<i>Location and description of the changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and</i>	Policies Map C

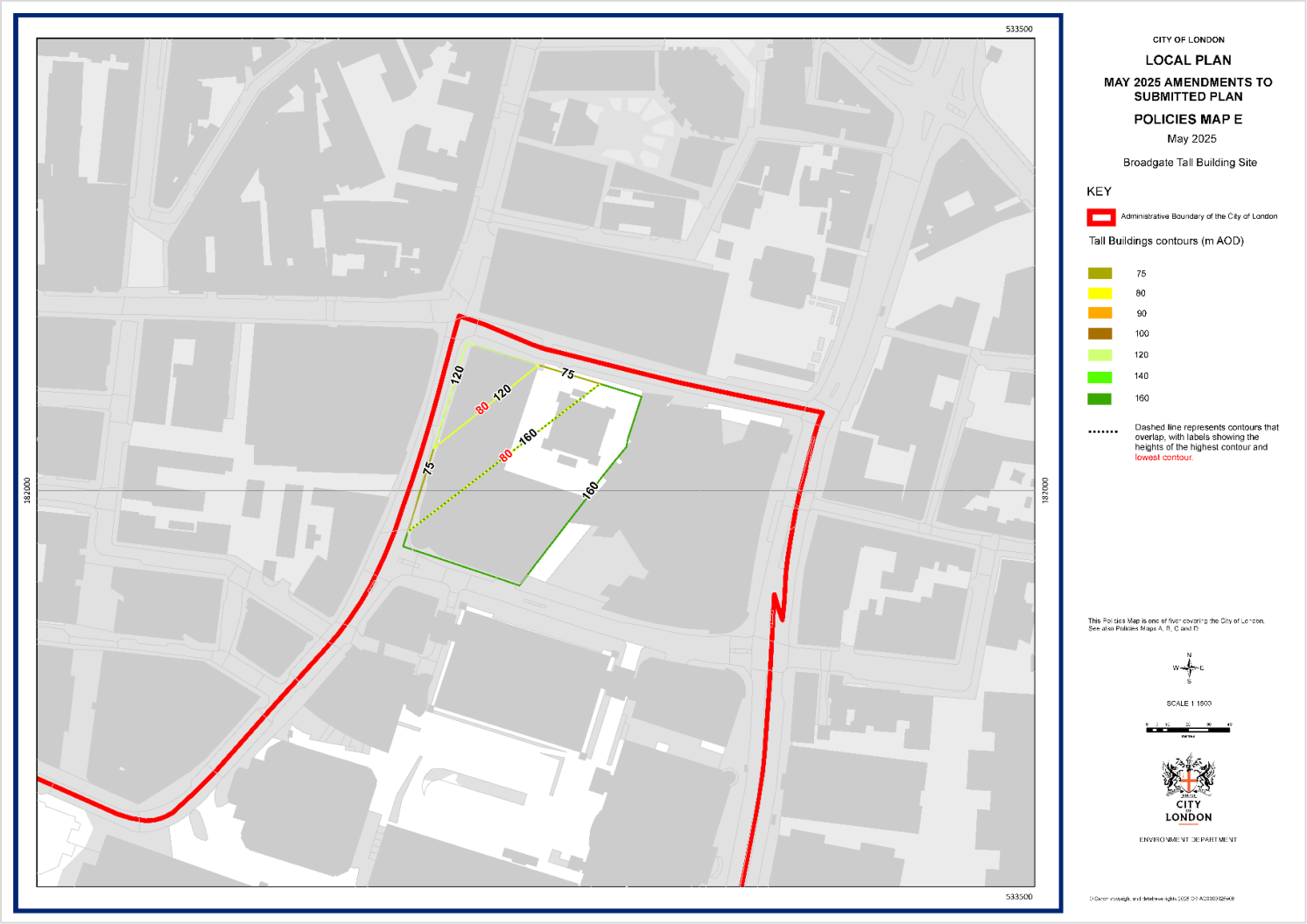
				<i>Heritage Impact Assessment (HTB36-40).</i>	
PM3	Tall buildings	New London House	<i>Minor amendments over this site to create the heights of between 75m –80m and 80m-90m.</i>	<i>Location and description of the changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and Heritage Impact Assessment (HTB36-40).</i>	Policies Map C
PM4	Tall buildings	30 Fenchurch Street	<i>Minor amendments over this site to create the heights of between 100m – 120m and 120m – 140m.</i>	<i>Location and description of the potential changes to the tall buildings contours which have been subject to further Strategic View Impact Assessment and Heritage Impact Assessment (HTB36-40).</i>	Policies Map C
PM5	Tall buildings	Broadwalk House	<i>Amendments to the contours to include new Broadgate Tall Building Site.</i>	<i>A new policy map shows the proposed contours. This has been subject to further Strategic View Impact</i>	Policies Map E *new*

				<i>Assessment and Heritage Impact Assessment (HTB36- 40).</i>	
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PM2, PM3, PM4





Appendix 5- City Plan 2040 HRA Review

September 2025

Introduction to this document

The Appropriate Assessment (2024) identified at paragraph 6.5 that “The Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites.”

The Main Modifications to the City Plan make some amendments to the policies assessed within the Screening and the Appropriate Assessment. Therefore a review of these changes is necessary to conclude whether they have any implications on the conclusions within the Assessment.

Stage 1- Screening of Main Modifications to the City Plan 2040

The first stage in the HRA Review has been to review the Main Modifications to the City Plan against the previous conclusions of the HRA Screening to identify if the changes could have any impact upon the conclusions reached. Where policies had previously been ‘screened’ into the Appropriate Assessment this was identified within the table and further assessment was required at Stage 2.

The results of this identified that the following policies which were screened in had some changes made to them through the Main Modifications:

- S3: Housing
- HS6: Student accommodation
- S4: Offices
- CV4: Hotels
- HL7: Sport and recreation

Table 1- HRA Review of Main Modifications

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 1 Strategic Priorities	City Plan Vision	MM1	<p><u>By 2040 the City of London will have become:</u></p> <ol style="list-style-type: none"> <u>A stronger, more vibrant and competitive economy.</u> The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. <u>A 7-day-a-week destination.</u> The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. <u>A more sustainable city-</u> The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. <u>A more inclusive and healthier city-</u> the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. <u>A place where heritage and positive change are celebrated-</u>the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape. 	<p><u>Chapter 1 Strategic Priorities:</u></p> <p>Assessment screened the policies which stem down from the priorities. No change.</p>	None
Chapter 2 Spatial Strategy	Key Diagram	MM2	<i>Change to include new Broadgate Tall Building Site on Key Diagram</i>	<u>Chapter 2 Spatial Strategy:</u> Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 2 Spatial Strategy	2.1 (10)	MM3	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, and the Fleet Valley and the Broadgate tall building site, which are identified as areas suitable for tall buildings.	<u>Chapter 2 Spatial Strategy:</u> Assessment screened the policies which stem down from the Spatial Strategy. No change.	None
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	HL2 (1) Developers will be required to effectively manage the <u>their proposal's impact of</u> their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for <u>which includes requirements for Air Quality Neutral Assessments and</u> Air Quality Impact Assessments (AQIAs).	<p><u>HL2:</u> Policy seeks to avoid adverse impacts on air quality from new development but will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	HL7 (2) Existing public sport and recreational facilities will be protected in situ, unless:	HL7: Leisure development as likely activity. If implemented effects on air pollution and changes in water quality/quantity. Policy permits sport and recreation facilities and therefore, could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.	'Smaller contribution' to air pollution identified in section 4.39 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	3.8.1 The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>	HL7: As above	As above
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets. <u>For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.</u>	HL9: Policy sets requirements for new major development to undertake a rapid Health Impact Assessment and submit a full HIA for developments subject to an Environmental Impact Assessment or where the development could have health impacts and will not itself result in development. No likely potential effects or need for scoping into the AA.	None

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	<p>2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City's housing need and contributing to London's wider housing needs by:</p> <p>a. ensuring the delivery of <u>applying the Mayor's threshold approach of a minimum of 35% affordable housing and</u> a minimum of 50% affordable housing on public sector land;</p> <p>b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and</p> <p>c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.</p> <p>3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.</p>	S3: Residential development. Potential effects on water quality or quantity. Policy seeks to protect existing housing and provide additional housing in or near identified residential areas (1,706 residential units between 2025/26 and 2039/40). This will contribute to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	<p>'Main contributions' to water quantity and quality identified in section 4.40 of the Screening Assessment.</p> <p>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</p>
Chapter 4 Housing	4.1.12	MM9	<p>4.1.12- The City Corporation's Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through 'windfall' development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</p>	<u>Chapter 4 Housing:</u> as above	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact																																				
Chapter 4 Housing	New paragraph	MM10	<p><i>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</i></p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 2- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr><tr><td><u>2022/23</u></td><td><u>96</u></td><td><u>Completions</u></td></tr><tr><td><u>2023/24</u></td><td><u>0</u></td><td><u>Completions</u></td></tr><tr><td><u>2024/25</u></td><td><u>29</u></td><td><u>Completions</u></td></tr><tr><td><u>2025/26</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td></td><td><u>2,116</u></td><td></td></tr></table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>	<u>2022/23</u>	<u>96</u>	<u>Completions</u>	<u>2023/24</u>	<u>0</u>	<u>Completions</u>	<u>2024/25</u>	<u>29</u>	<u>Completions</u>	<u>2025/26</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>342</u>	<u>Completions (projected)</u>		<u>2,116</u>		<u>S3</u> : as above.	As above
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Appendix 2	New appendix	MM11	<p>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th>Year</th><th>Target* per annum</th><th>Units</th><th>Status</th></tr><tr><td><u>2025/26</u></td><td><u>146</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>146</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>146</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>146</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2029/30</u></td><td><u>102</u></td><td><u>0</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2030/31</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2031/32</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2032/33</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2033/34</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2034/35</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2035/36</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2036/37</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2037/38</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2038/39</u></td><td><u>102</u></td><td><u>190</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td><u>2039/40</u></td><td><u>102</u></td><td><u>220</u></td><td><u>Completions (windfalls and capacity)</u></td></tr><tr><td>Total</td><td>1,706</td><td>2,430</td><td></td></tr></table>	Year	Target* per annum	Units	Status	<u>2025/26</u>	<u>146</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>146</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>146</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>146</u>	<u>342</u>	<u>Completions (projected)</u>	<u>2029/30</u>	<u>102</u>	<u>0</u>	<u>Completions (projected)</u>	<u>2030/31</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2031/32</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2032/33</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2033/34</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2034/35</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2035/36</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2036/37</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2037/38</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2038/39</u>	<u>102</u>	<u>190</u>	<u>Completions (windfalls and capacity)</u>	<u>2039/40</u>	<u>102</u>	<u>220</u>	<u>Completions (windfalls and capacity)</u>	Total	1,706	2,430		S3: as above	As above
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Chapter 4 Housing	4.1.8	MM12	4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>	<u>Chapter 4 Housing:</u> as above	As above																																																																				
Chapter 4 Housing	4.1.10	MM13	4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (<u>an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year</u>) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...	<u>Chapter 4 Housing:</u> as above	As above																																																																				

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 4 Housing	4.1.11	MM14	4.1.11 The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.	Chapter 4 Housing: as above	As above
Chapter 4 Housing	4.1.15	MM15	4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.	Chapter 4 Housing: as above	As above
Chapter 4 Housing	HS6 (2)	MM16	HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.	HS6: Student accommodation. Potential effect on changes in water quality or quantity. Policy supports the development of student accommodation, which would make a small scale contribution to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.	'Smaller contributions' to water quantity and quality identified in paragraph 4.41 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 5 Offices	S4 (1)	MM17	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 NIA (1,600,000 m2 GIA) net during the period 2021 to 2040, phased as follows: <ul style="list-style-type: none"> 2021 – 2026 500,000m2 NIA (666,666m2 GIA) 2026 – 2031 400,000m2 NIA (533,333m2 GIA) 2031 – 2036 200,000m2 NIA (266,666m2 GIA) 2036 – 2040 100,000m2 NIA (133,333m2 GIA) 	S4: Employment development. Potential effects on air pollution and changes in water quality or quantity. Policy seeks to protect existing offices and provide additional offices in the City. The scale of office development provided for is significant (minimum of 1.2 million m2 during 2021- 2040), and would contribute to effects relating to air pollution and changes in water quantity / quality. Development in the City must be car free, but employment development could attract trips from elsewhere	'Main contributions' to air pollution and water quantity and quality identified in paragraphs 3.38 and 4.40 of the Screening Assessment. To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.
Chapter 5 Offices	5.1.1	MM18	The minimum requirement of overall office floorspace target of 1,200,000m2 net internal area (or 1,600,000m2 GIA) is derived from the estimated growth in office employment between 2021 and 2040...	S4: as above.	As above.
Chapter 5 Offices	5.3.9	MM19	5.3.9...Where a change in use is proposed from office floorspace to another use,... It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area.	OF2: Policy sets out circumstances in which loss of office accommodation would be inappropriate and routes any loss of in office space should follow and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 7 Culture and Visitors	7.1.5	MM20	7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.	S6: Policy defines the mix of uses appropriate to the City of London to attract visitors but the development itself (e.g. hotels) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact									
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	MM21	<p><i>New paragraph 7.3.4</i></p> <p><u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u></p> <table><tr><td></td><td><u>On Site</u></td><td><u>Off Site</u></td></tr><tr><td><u>> 10,000sqm gross floorspace</u></td><td><u>Yes. Provision will be commensurate with the scale of development</u></td><td><u>Not acceptable</u></td></tr><tr><td><u>< 10,000sqm gross floorspace</u></td><td><u>Preferred. Provision will be commensurate with the scale of development</u></td><td><u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u></td></tr></table>		<u>On Site</u>	<u>Off Site</u>	<u>> 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>	<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>	<p><u>CV2:</u> Policy requires major developments to incorporate arts and culture provisions but will not itself result in new development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
	<u>On Site</u>	<u>Off Site</u>												
<u>> 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>												
<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>												
Chapter 7 Culture and Visitors	CV4 (2)	MM22	CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts	<p>CV4: Hotels and visitor infrastructure development. Potential effects on air pollution and changes in water quality or quantity.</p> <p>Policy sets out circumstances in which hotel development would be permitted. This would contribute to air pollution and water quality and quantity effects. Development in the City must be car free, but hotels could attract trips from elsewhere.</p>	<p>‘Main contributions’ to air pollution identified in paragraph 4.38 of the Screening Assessment.</p> <p>Mitigation identified in Screening Assessment: This policy states that hotels must be in suitable locations with good access to public transport, which will help to reduce trips and therefore air pollution associated with this policy.</p> <p>To Stage 2: Review the Mitigation Measures within the Appropriate Assessment.</p>									

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 8 Infrastructure	IN2	MM23	<p>1. Development must not lead to capacity or reliability issues in the surrounding area and should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.</p> <p>2. Developers are required to demonstrate, through effective engagement with <u>provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.</u></p> <p>3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers <u>to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, which may require the provision of and have explored and (where feasible) provided</u> space within new developments for on-site infrastructure or off-site infrastructure upgrades.</p> <p><i>Policy clauses 2 and 3 renumbered.</i></p>	<p>IN2: policy sets out how development should provide infrastructure and will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 9 Design	9.1.0	MM24	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.	<p><u>S8</u>: Policy sets out design requirements for development, including addressing climate change, sustainable design, limiting light pollution and providing green infrastructure but will not itself lead to development.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 9 Design	9.1.3	MM25	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.	<u>S8</u> : as above.	As above
Chapter 9 Design	9.1.4	MM26	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits <u>for the site, its context and the whole City</u> before considering the many wider other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.	<u>S8</u> : as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.1.5	MM27	<u>9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.</u>	<u>DE1:</u> Policy sets out requirements for development regarding sustainable design, including energy efficiency, circular economy, limiting pollution and water use but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 9 Design	DE1 (1)	MM28	DE1 (1) Development proposals should follow <u>adopt</u> a retrofit first approach; thoroughly exploring the potential for retaining and retrofitting. At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (3)	MM29	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (7)	MM30	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. Retention, refurbishment, retrofit and reuse <u>Reuse, refurbishment and retention</u> of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	<u>DE1:</u> as above.	As above
Chapter 9 Design	DE1 (8)	MM31	DE1 (8) Proposals for major development will be required to: a. Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the waste category; b. Commit to achieving a minimum NABERS UK rating of 5 stars; Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.	<u>DE1:</u> as above.	As above
Chapter 9 Design	9.2.0	MM32	9.2.0 Materials – retaining <u>reducing</u> embodied carbon emissions from new build construction through retrofit and in existing buildings and materials, and improving resource efficiency.	<u>DE1:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	9.2.9	MM33	<p>9.2.9 For major development (<u>where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more</u>) the following information should be provided:</p> <ul style="list-style-type: none"> - A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development. - <u>A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.</u> - An energy assessment in line with the Mayor of London's Energy Planning Guidance - An options appraisal following the City Corporation's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits - An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality <u>be at least Air Quality Neutral</u>, in line with the City of London Air Quality SPD. - Details of collective infrastructure <u>and other environmental sustainability improvements for the site, its context or the City as a whole.</u> which has been incorporated to address environmental challenges. - Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan. - <u>Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation's Carbon Options...</u> 	DE1: as above.	As above
Chapter 9 Design	9.2.9	MM34	<p>9.2.9 Extensions</p> <ul style="list-style-type: none"> • If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements. <p>For minor development</p> <ul style="list-style-type: none"> • Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice. • <u>For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.</u> 	DE1: as above.	As above.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 9 Design	DE4 (3)	MM35	3. Requiring all tall buildings or major developments to provide free to enter....	<u>DE4</u> : Policy sets out design requirements for roof terraces and elevated public spaces, including requirements for tall buildings, major developments, retail and leisure facilities to create attractive places and provided accessible elevated spaces. The policy will itself not result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 10 Transport	VT3 (4)	MM36	4. All off-street <u>non-residential bays for</u> car parking facilities must be equipped with <u>active</u> electric vehicle charging points <u>usable from the outset</u> .	<u>VT3</u> : Policy seeks to restrict car parking, provide charging facilities for electric vehicles and provide for taxi ranks at key locations but itself will not result in development. No likely potential effects or need for scoping into the AA.	None. Mitigation identified in Screening Assessment: This policy states that “Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.” In addition, no new public car parks will be permitted and underutilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points. These will contribute to mitigation for air pollution impacts.
Chapter 10 Transport	AT1 (c)	MM37	<u>AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.</u>	<u>AT1</u> : Policy sets requirements for developers to facilitate pedestrian movement and enhance permeability. No likely potential effects or need for scoping into the AA.	None. Mitigation identified in Screening Assessment: Policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution
Chapter 10 Transport	AT3 (2)	MM38	<u>AT3 (2) In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations.</u> All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	<u>AT3</u> : Policy makes provision for cycling infrastructure. No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 10 Transport	10.10.1	MM39	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. <u>A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints. This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.</u>	AT3: as above.	As above.
Chapter 10 Transport	10.10.2	MM40	<u>10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.</u> <i>Existing wording in 10.10.2 to move to 10.10.3, etc.</i>	AT3: as above.	As above
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting . The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered <u>sought where appropriate</u> ;	HE1: Policy requires developments that affect heritage assets or their settings to be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. The policy also sets out criteria when development may impact a heritage asset but will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.	HE1: as above.	As above.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u>	HE1: as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>Many aspects of the St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study <u>and the Setting Study (where appropriate)</u> to understand their site's significance and the key attributes of significance they should consider	<u>HE1:</u> as above.	As above
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	11.3.8 On sites where significant archaeological artefacts <u>or features</u> are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.	<u>HE2:</u> Policy seeks to conserve and enhance the City's archaeology and ancient monuments and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted.</u>	<u>HE3:</u> Policy seeks to conserve and enhance the Tower of London World Heritage Site and its setting and development proposals in the vicinity of the Tower of London World Heritage Site are encouraged to enhance pedestrian and cycle routes. However, this policy itself will not result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>	<u>HE3:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	2. The tall building areas identified on the Policies Map and Figure 14 (<u>City Cluster, Fleet Valley and Broadgate site</u>) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	<u>S12</u> : Policy provides design requirements for the developments of tall buildings in respect of the City’s character and heritage, environment impact and with regard to assisting in the dispersal of air pollutants. The policy will not itself result in development. No likely potential effects or need for scoping into the AA.	None.
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects both heritage significance and townscape character</u> , creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	8c. the significance of heritage assets and their immediate and wider settings.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	For the purposes of Policy D9 of the London Plan, the The tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, and Fleet Valley and Broadgate Tall Building Site areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new</u> tall buildings, <u>particularly on sites where there is no tall building currently</u> , would be likely to <u>have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	11.5.6 The heights of the buildings in the City Cluster, and Fleet Valley and Broadgate Tall Building site areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both These areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul’s Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	<i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i>	<u>S12</u> : as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment</u> , townscape and skyline, <u>including their cumulative effects</u> .	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	<i>New paragraph after 11.5.12 (and renumber after)</i> <u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u>	<u>S12</u> : as above.	As above
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	<i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i>	<u>S12</u> : as above.	As above
Chapter 11 – Heritage and Tall Buildings	S13	MM57	2. Protecting and enhancing significant local views of St. Paul’s Cathedral, through the City Corporation’s St. Paul’s Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;	<u>S13</u> : Policy seeks to conserve protected views and will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems. This can</u> can take many forms and require careful design, installation and regular maintenance.	<u>OS2</u> : Policy sets requirements for urban greening to be delivered as part of new development, including the installation of biodiverse extensive or intensive features. No likely potential effects or need for scoping into the AA.	None.

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 13 Climate Resilience	S15	MM59	<p><u>Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.</u></p> <ol style="list-style-type: none"> <u>1. Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;</u> <u>2. Development must address the impacts of the urban heat island effect;</u> <u>3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;</u> <u>4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and</u> <u>5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.</u> 	<p><u>S15:</u> Policy sets out design requirements for development to adapt and be resilient to climate change and flood risk.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 13 Climate Resilience	13.1.2-3	MM60	<p><u>13.1.4 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u></p> <p><u>13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u></p>	<u>S15:</u> as above.	As above
Chapter 13 Climate Resilience	CR1	MM61	<p><u>2. Building designs should minimise any contribution to the urban heat island effect. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.</u></p>	<p><u>CR1:</u> Policy sets out design requirements for development to prevent overheating and urban heat island effects, including through the design of the building.</p> <p>No likely potential effects or need for scoping into the AA.</p>	None.
Chapter 13 Climate Resilience	13.2.2	MM62	<p><u>13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u></p> <p><u>13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u></p> <p><u>13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.</u></p>	<u>CR1:</u> as above.	As above

Chapter	Paragraph	MM number	Amended text	HRA Assessment conclusion (2024)	Impact
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map) .	<u>S21</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>	<u>S23</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	<u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u>	<u>S24</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	<u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u>	<u>S25</u> : Policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies. No likely potential effects or need for scoping into the AA.	None.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u>	<u>S25</u> : as above.	As above
Chapter 15 Implementation	Policy S26	MM68	<u>(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.</u> <i>Renumber parts 2 and 3.</i>	<u>S26</u> : Policy states that the City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development. As such, it will not itself lead to development. No likely potential effects or need for scoping into the AA.	None.

Stage 2: Review of Mitigation Measures within the Appropriate Assessment

The above stage 1 process has identified some main modifications to policies which have some 'main' or 'smaller' contributions to air quality or water quantity or quality and were 'screened' into the 2024 AA. These policies are shown below against the detail of the change in the Main Modification and whether these changes had any implications of the quantity of development to take place in relation impacts on air pollution or water quality and quality. This identified that the changes do not impact upon quantum. The mitigation measures previously identified in the AA are considered to remain appropriate, subject to no further changes in the approach to these within the MMs or AMs to the City Plan.

Policy	Air Quality	Water quantity or quality	Detail of change	Conclusion
S3: Housing		Main	Changes relate to the reporting of housing delivery and do not result in an increase in expected development. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain. Stage 3: Review of the mitigation policies.
HS6: Student accommodation		Smaller	Changes relate to securing a nominations agreement with a higher education institution. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 remain. Stage 3: Review of the mitigation policies.
S4: Offices	Main	Main	Changes relate to the measurement of office development and expectations for changes of use. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies.
CV4: Hotels	Main	Main	Change relates to acceptability of adverse impacts on residential amenity. Policy change will not lead to more new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures for water quantity and quality identified in paragraphs 5.6 to 5.14 and air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies
HL7: Sport and recreation	Smaller		Removal of reference to protection of 'public' sport and recreation facilities only. This change will not in itself lead to new development.	No change to conclusion of Appropriate Assessment, subject to mitigation measures identified for air quality in paragraphs 5.3 to 5.5 remain. Stage 3: Review of the mitigation policies

Stage 3: Review of the Mitigation policies identified in Appropriate Assessment against the Main and Additional Modifications

This stage involved review of the mitigation measures identified in the AA against the MMs and Ams to the City Plan. It identified that there were no changes to parts of the policy which include mitigation measures designed to address the impacts on air quality or water quantity and quality.

It therefore concludes that the conclusions of the Appropriate Assessment 2024 remain in light of the Main and Additional Modification to the City Plan.

Policy with mitigation	Air pollution mitigation	Water quality mitigation	Commentary in Appropriate Assessment of mitigation measures	MM or AM change
Policy HL5: Contaminated land and water quality		Yes	Paragraph 5.6: policy states “Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.”	No change to policy.
Policy CV4: Hotels	Yes		Paragraph 5.4 states policy requires that hotels must be in suitable locations with good access to public transport.	No change to this wording. Changes relate to unacceptable impacts only.
Policy VT2: Freight and Servicing	Yes		Paragraph 5.4 states policy requires that servicing areas are equipped with electric vehicle fast charging points. It also states that “Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.”	No change to policy.
Policy VT3: Vehicle Parking	Yes		Paragraph 5.4: States that “Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.” In addition, no new public car parks will be permitted and under-utilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points.	Change to this policy relates to the provision of electric charging points and does not change the approach to minimising car parking provision or prioritisation of existing car parking for other uses. AM27 confirms that “ <u>In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.</u> ” This does not change the scope of the potential for air pollution as this is also covered by the London Plan policies E10 (H), T6.1 and T6.5.
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	Yes		Paragraph 5.4 states policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fueled vehicles and therefore air pollution	No change to this wording. Changes relate to opportunities to enable improved and new connections through to mainline railway stations.
Policy IN1: Infrastructure provision and connection		Yes	At paragraph 5.7: Policy provides measures that will reduce the requirement for water treatment and discharge associated with the Plan: “water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands.” And “Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and	No change to policy.

			greywater recycling, minimising discharge to the combined sewer network.”	
Policy CR3: Sustainable drainage systems (SuDS)		Yes	Paragraph 5.6: All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.” And “SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.”	No change to policy.
Strategic Policy S17: Thames Policy Area		Yes	Paragraph 5.6: character of the riverside will be enhanced by “Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.”	No change to policy.
Strategic Policy S19: Pool of London	Yes		Paragraph 5.4: states policy requires that car parking areas are removed upon redevelopment, within this policy area	No change to policy.

Stage 4 Consultation responses

The previous conclusion of the AA highlighted how HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. As part of the Regulation 19 consultation the HRA was subject to consultation with Natural England, as well as the Environment Agency, to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making. Neither of these bodies raised any specific comments or concerns in relation to the conclusion of the HRA.

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