

Consultation Responses – Key Issues

Vision and Objectives

1. There was support for the vision and objectives of the draft Plan. The business community, in particular, supported the ambition for the City to retain its role as a world leading office and professional services centre.
2. A number of questions were raised, particularly from residents, about potential conflicts between the various ambitions in the draft Plan and how such conflicts would be addressed, for example reconciling aims to protect amenity and reduce pollution with encouraging increased vibrancy and activity. There was also a concern that the draft Plan does not explain how it will deliver 'outstanding environments' whilst continuing to deliver economic growth.
3. Within the general comments, there was support for the increased emphasis on urban greening, although there was some concern from businesses about the deliverability and viability of urban greening initiatives. This is considered further below.
4. Heritage organisations, in particular, were concerned about potential conflict between the aim of delivering further tall buildings in the City Cluster and the need to preserve the character of the historic City, particularly the impact of tall buildings on protected views.

Strategic Policy S1: Healthy and Inclusive City

5. This section of the draft Plan generated a number of comments from residents, workers, developers and businesses, which were broadly supportive of the aim of delivering a much healthier and inclusive City of London. There was support for the inclusion of this section as the first set of policies and the greater priority that has been given to this agenda in the draft Plan.
6. The requirement for developers to consider the health impacts of development were supported, with strong support from the Mayor for the requirement for Health Impact Assessments. The development industry, whilst supporting the principle, felt that some flexibility was required in how this is implemented. A particular concern was that the HUDU methodology suggested in the draft Plan was designed for residential development and may not be applicable to commercial development.
7. Whilst supporting the requirement to deliver healthy buildings, developers highlighted that a range of certification existed and that the draft Plan should not rely solely on the Well Building Standard.
8. Residents considered that greater emphasis should be given to protecting the amenity of residential areas the City's quieter areas (such as churchyards and open spaces) to avoid adverse noise and other amenity impacts from 24/7 activity and vibrancy.
9. There was very strong support for measures to address poor air quality in the City, with residents, workers, businesses and developers recognising that air

quality was a significant concern. Respondents highlighted the need for improvements to Beech Street and the potential introduction of City-level ULEZ. There was some concern from businesses about the detailed requirements for Air Quality Impact Assessments and a suggestion that these should be prioritised for new floorspace.

Strategic Policy S14: Urban Greening

10. There was widespread support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity. There was some concern from developers about the feasibility, deliverability and impact of viability of providing more greening on buildings, as opposed to around buildings.
11. Alongside the support for greening, there was a strong view that the draft Plan could go further and be more ambitious in its requirements and delivery. Similar comments were received in relation to biodiversity, with strong support for policies which seek to go further and deliver improvements in biodiversity across the City.
12. Much of the support came from individual residents, workers and wildlife and conservation groups. Developers, property companies and businesses, whilst supporting the ambition for a greener, more sustainable City, were concerned at the perceived inflexible nature of the policies and sought a more flexible approach which responded to opportunities on a site by site basis.
13. Residents, City workers and businesses were supportive of proposals to increase the number of open spaces in the City, particularly green open spaces, to provide more space for people to relax and eat lunch.
14. A number of respondents commented on the lack of specific policy protection for trees or policy support for additional tree planting in the City separately from measures aimed at increasing greening and open space provision.

Transport**Strategic Policy S9: Vehicular Transport and Servicing**

15. Of the 60 responses received which commented on this policy, approximately half were from individuals, the remainder largely from business and transport organisations. A number of the comments were made in response to the draft Transport Strategy but were considered to be more, or equally, relevant to the development of the Local Plan.
16. Overall there was support for the general approach in the policy to minimise road danger and congestion and reduce vehicle emissions across the City. A small minority of respondents were opposed to proposed measures to reduce the number of vehicles or restrict their access to parts of the City. Those opposed to further restrictions included organisations and individuals who had made similar comments in respect of the draft Transport Strategy.

17. Whilst supporting the principle of reducing servicing and delivery trips within the City and supporting the concept of off-site consolidation, questions were raised about how this would work in practice. There was concern that off-site consolidation could become onerous, deter business occupiers and may not be feasible for all major development and that provision should be made for continued full on-site servicing where this can be justified. The current 1,000m² threshold for requiring consolidation was seen as too low. Respondents also recognised that the approach to consolidation is still in its infancy and policy needed to be flexible until the policy approach and potential solutions have matured.
18. There was support for encouraging greater use of the Thames for passenger and freight transport, including reinstatement of Swan Lane Pier and use of Walbrook Wharf for wider freight and servicing activity.

Strategic Policy S10: Walking, Cycling and Healthy Streets

19. There was support for the Healthy Streets approach and the commitment to improving the experience of using streets and spaces. Several respondents felt that the City Corporation could be more ambitious in how this is taken forward, with suggestions for further Healthy Streets (including Broadgate) and greater prioritisation for pedestrians/cyclists.
20. A number of responses supported further improvements to cycling facilities in the City, including more cycle lanes, greater prioritisation for cyclists and measures to further restrict vehicle use in the City. Changes to existing cycle lanes were also suggested, particularly in relation to Cycle Superhighway CS3. Alongside these proposals, others expressed concern at cyclist behaviour and the impact that this could have for road and pedestrian safety.
21. Several respondents suggested improvements and extensions to the City's highwalks, including within and around the Barbican, but also elsewhere in the City to deliver improvements in pedestrian safety. It was suggested that the City should take on board lessons from areas like New York.
22. Whilst there was widespread support for improvements to the pedestrian network and pedestrian experience in the City, including increasing permeability around, within and through large street blocks, there was also some concern from developers and property owners at the practicality of doing this. The provision of new pedestrian routes through buildings will need to have regard to design and security considerations as well as feasibility and viability.
23. The aspiration to improve the pedestrian comfort level in the City to B+ was supported in principle, although some developers and business organisations considered that this should be an "aspirational minimum", recognising that it may not be feasible to achieve in some parts of the City. The example of the City Cluster was given.

Tall buildings, protected views and heritage assets

Strategic Policy S13: Protected Views

24. There was overall support for continued protection of key views in the draft Plan (including St Paul's Heights, views of and from the Monument and the London Views Management Framework).
25. A number of the heritage bodies considered that the policy was not clear enough to protect key elements of the view of the Cathedral along the processional route of Fleet Street, Ludgate Circus and Ludgate Hill (ensuring a clear sky background to the western towers, between the towers and the dome, and the dome silhouette) and called for strengthening of the policy or revisions to supplementary planning guidance to ensure that development did not impinge on the foreground or background of the view of St Paul's from this route.

Strategic Policy S12: Tall Buildings

Areas inappropriate for new tall buildings – Figure 19

26. Many respondents considered Figure 19 to be ambiguous and required further clarity and amplification. Objections were raised to the implication that all other areas would be appropriate for tall buildings including the backdrop to the Tower of London when viewed from the south bank. Some respondents also objected to the implication that areas to the east of Aldersgate/West of Golden Lane and North of Beech St could be suitable for tall buildings.

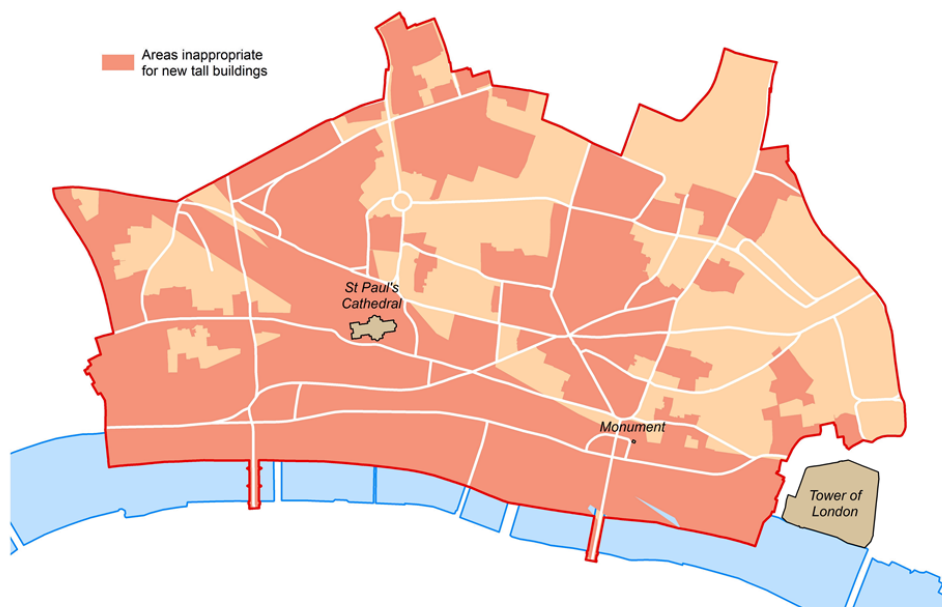


Figure 19: Areas inappropriate for new tall buildings

Definition of tall buildings

27. Neighbouring authorities suggested that the draft Plan should refer to the difference in the definition of tall buildings between the City (over 75m) and adjoining areas (over 30m in Islington and Tower Hamlets) and the possible impacts of tall buildings on conservation areas. The Mayor suggested that the Plan could adopt a lower definition of a tall building within the Thames Policy Area (the Mayor of London Order requires consultation with the Mayor of buildings over 25m in the Thames Policy Area).

Tall building design

28. There were a number of questions about the quality of design of tall buildings and suggestions that the policy should include an assessment of the cumulative impact of development, particularly the eastern edge of the City Cluster on the setting of the Tower of London.
29. A number of businesses considered that the requirement on developers to provide open space at street and publicly accessible open space or other facilities at upper levels could impact on viability and should be considered on a case for case basis. There was a suggestion that height limitations should be relaxed to provide additional public space at upper levels.

Strategic Policy S11: Historic Environment

30. There was significant support for policy to positively manage heritage assets, but many felt that the wording should better reflect NPPF guidance and reference designated and non-designated heritage assets.
31. Many business respondents considered that the public benefit of city growth ought to be considered when judging substantial harm to heritage assets.

Strategic Policy S21: City Cluster

32. There were mixed responses to the extension to the City Cluster. There was support for the continued focus on office development in this area, and for the need to consolidate servicing and deliveries. The Mayor and Historic England suggested that the boundary ought to be more clearly delineated rather than having an indicative boundary to provide further clarity on which sites would be included.
33. Heritage bodies were concerned that an extended City Cluster could have a detrimental impact on the Outstanding Universal Value of the Tower of London, and impact on views of St Paul's Cathedral.
34. Some business considered that the City Cluster ought to be further expanded to include additional opportunity sites, including further opportunities along Bevis Marks and Fenchurch Street.
35. There was a concern at the impact of further intensification of the City Cluster and additional pressures upon adjoining areas. The Mayor considered that there ought to be a co-ordinated approach to new development to ensure sufficient footway capacity and traffic reduction.

36. Both businesses and heritage bodies believed the 3D modelling should be publicly available and a vision included for the heights and massing of envisaged buildings.



Figure 30: City Cluster Key Area of Change

Strategic Policy S23: Smithfield and Barbican

37. There was support for Culture Mile from the Museum of London, the Theatres Trust, the Mayor and some members of the public, citing the benefits of pedestrianisation, strengthening connections to other parts of the City, neighbouring boroughs and further afield, increased retail and food and beverage offer and supporting the creative industries.
38. A number of concerns were raised by residents within the Barbican and Golden Lane Estates that Culture Mile would increase night time activity which may impact upon residential amenity through additional noise disturbance, increase in pedestrian numbers using the highwalks, increase in traffic and light pollution from artificial light spillage. Concerns were raised that the Centre for Music and further tall buildings could be dominant and overshadow residential areas.
39. Further information was sought on the potential future uses of Smithfield Market following the Markets Consolidation programme and more detailed studies were sought on the pedestrian and vehicle movements around Smithfield and the Barbican, to alleviate concerns regarding increased traffic and pedestrian movements.

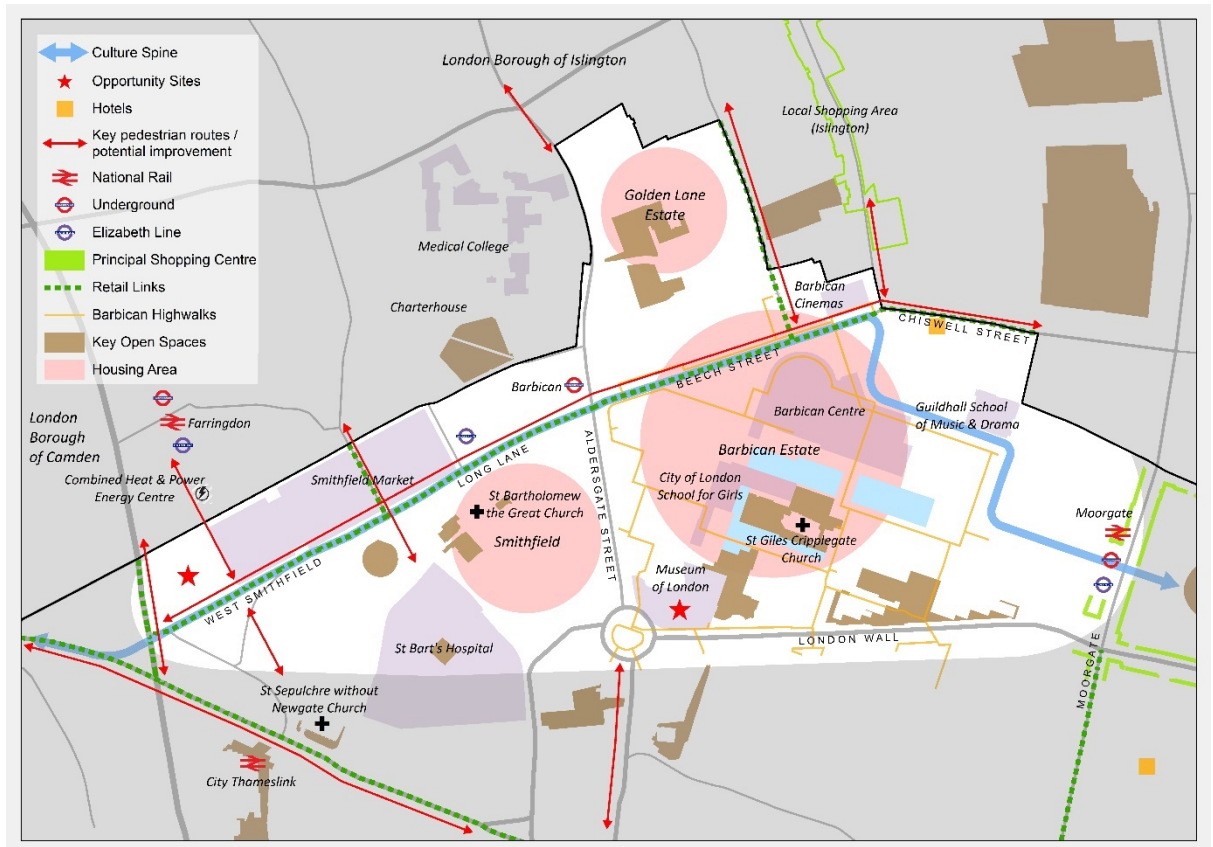


Figure 32: Smithfield and Barbican Key Area of Change

Comments on other parts of the draft Plan

40. Other parts of the draft Plan received a lesser number of comments, reflecting a degree of support for the approach taken, but also raising questions that will need to be addressed in proposed changes:

Strategic Policy S3: Housing

41. No comments were received from house building companies or the Home Builders Federation and relatively few other comments received on the proposed housing allocation. The Mayor supported the intention to meet the London Plan housing target and to concentrate housing in established residential areas.
42. Affordable housing generated more comment. The Mayor suggested that the requirement should be increased to 50% in line with the London Plan, with the tenure of affordable housing matching strategic London-wide needs and only 40% to be determined locally. City residents considered that the emphasis should be on provision of affordable housing on-site with a more robust approach to viability assessments to ensure policy compliance. Businesses, whilst supportive of the need for affordable housing, considered that there should be greater flexibility for this to be met through commuted sums.
43. There were concerns from residents that policies placed a greater emphasis on encouraging development than on residential amenity. Residents supported the continued emphasis on locating new residential development in established

areas but sought further changes to protect amenity, including the assessment of the cumulative effect of development and refusal of incompatible activities.

44. The need for access to services such as healthcare and quality affordable food was also raised.

Strategic Policy S4: Offices

45. Many businesses and the Mayor welcomed the planned growth in office floorspace. The Mayor indicated that further work should be undertaken to identify development sites and demonstrate that the growth in floorspace was deliverable.
46. There was strong support for the provision of flexible floorspaces to support small and medium sized enterprises, however many, including the Mayor and neighbouring authorities, thought further support was required for the provision of new, and protection of existing, low-cost business space. The London Borough of Islington suggested a collaborative approach which potentially used financial contributions from the City to help deliver affordable workspace in Islington.

Strategic Policy S5: Retailing

47. There was general support from the business community for additional retail floorspace, however some members of the public questioned why the draft Plan is seeking further space when nationally the retail market is changing.
48. Many respondents stressed the importance of leisure activities and experiential retail uses within the City and the need to move towards an evening economy and 7-day week trading.
49. Many business respondents considered that there should be more flexibility to enable use of vacant A1 units, further food and beverage offering, meanwhile uses, support for independents and specialist retail uses. This was supported by the Mayor who considered that the draft Plan failed to recognise the contribution of wider uses in generating vitality and interest in town centres.
50. Pedestrian permeability, public realm and quality-built environment were stated as important to maintain healthy retail footfall.

Other Key Areas of Change

51. Comments were received on all the proposed Key Areas of Change, with the majority of views expressed on the City Cluster and Smithfield and Barbican (outlined above).

Strategic Policy S17: Thames Policy Area

52. There was overall support for continuing to identify this area, but several respondents suggested that there needed to be greater co-operation with adjoining boroughs and agreement on a precise boundary for the area. There was support for continued office-led development, but also cultural activity and residential in appropriate locations.

Strategic Policy S18: Blackfriars

53. There were only 3 comments on this area, largely in support of the City Corporation's ambitions.

Strategic Policy S19: Pool of London

54. There was support for the overall ambition and strategy for regeneration of this part of the City. Individual land and building owners made representations regarding the potential future uses of their sites.

Strategic Policy S20: Aldgate & Tower

55. There was broad support for the City Corporation's ambitions, with a number of specific comments including the need for continued public realm enhancement, improvement of the experience for pedestrians and cyclists, the need for more active frontages onto streets, greater cross borough working and concern at the impact of development on the setting of the Tower of London.

Strategic Policy S22: Fleet Street

56. There was support for including this as a Key Area of Change, with comments suggesting a need for an improvement to this important processional route, with improved public realm and pedestrian access, improvements in the quality of retail and office offer.

Overall Viability of the Local Plan

57. There was some concern from developers about the cumulative impact of the Local Plan policies on the viability and the need to apply policies flexibly and appropriately to ensure they do not have a critical impact on deliverability of development.