

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE
Friday, 17 May 2019

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Friday, 17
May 2019 at 11.00 am

Present

Members:

Deputy Alastair Moss (Chairman)
Randall Anderson
Deputy Keith Bottomley
Deputy Jamie Ingham Clark
Graham Packham
William Upton QC

Officers:

Gemma Stokley	- Town Clerk's Department
Adrian Roche	- Department of the Built Environment
John Harte	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Michelle Price	- Department of the Built Environment
Alanna Coombes	- Department of the Built Environment

1. **APOLOGIES**

Apologies for absence were received from Christopher Hayward (Deputy Chairman) and Shravan Joshi.

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

There were no declarations of interest.

3. **MINUTES**

The public minutes of the meeting held on 6 March 2019 were considered and approved as a correct record.

MATTERS ARISING

Facilities for Public Cycle Parking (page 1) – A Member requested an update on what was being done to address the impact of development on Wi-Fi coverage as alluded to at the last meeting of this Sub Committee. The Assistant Director (Planning Policy) reported that he had raised this matter with the City Corporation's Strategic Infrastructure Advisor in the City Property Advisory Team (CPAT) who had, in turn, responded directly to the Member who had initially raised this matter. He undertook to circulate the update to the wider Sub Committee.

Outstanding Actions – Members requested that the Town Clerk introduce an Outstanding Actions report to be considered by the Sub Committee at all future meetings.

4. **CITY OF LONDON LOCAL PLAN REVIEW: REPORT ON PUBLIC CONSULTATION, KEY ISSUES RAISED AND PROPOSED NEXT STEPS**

The Sub-Committee considered a report of the Director of the Built Environment outlining the key issues that arose from the public consultation on the draft Local Plan for Members' discussion.

Officers clarified that the purpose of the report was two-fold and was intended to bring new members of this Sub-Committee up to speed on the background to the Local Plan and the public consultation around this but also to seek confirmation from the Sub-Committee in terms of how they might now want to proceed.

Officers went on to confirm that the comments received through the public consultation had been wide ranging with a range of opinions expressed throughout. Members were informed that, historically, the organisation's Local Plan had not attracted a huge number of public responses however, on this occasion an extensive and wide-ranging programme of engagement was undertaken including letters to all City residential addresses, emails to approximately 4,600 business on the City Occupiers Database and various stakeholder and public consultation events. As a result, the number of responses received was more than double that when compared with the last iteration of the Local Plan. Officers went on to clarify that some of the responses received (from the City Property Association (CPA) for example) were representative of a much wider group.

Members were informed that the responses received demonstrated that there was no single, dominant theme and that there was general support for the approach outlined within the document. There had been a lot of comment on transport which was unsurprising given that both the Local Plan and Transport Strategy were designed to be complimentary of one another and had both been out for public consultation at the same time. Opinions had been expressed in terms of protected views, height and bulk with regard to building design, support had been voiced for green infrastructure going forward and the tension between vibrancy and residential amenity had been a recurring theme.

Officers reported that a number of key areas of change had been identified within the Plan but that the two main areas that had attracted comment were Smithfield and Barbican as well as the City Cluster and what the intensification of development here actually meant at ground level.

Officers highlighted that the report put before the Sub-Committee also set out a proposed timetable in terms of how it was now proposed that the Plan be taken forward. A Member questioned how the proposed timetable fitted with the adoption of the London Plan. Officers clarified that, legally, the Local Plan needed to be in general conformity with the London Plan. However, it was recognised that the adoption of this was still very flexible and subject to

Government input and whether the Mayor accepts Government comment. In theory, the London Plan should always be a step ahead of the Local Plan. Members were assured that, at present, the Local Plan was broadly in step with the draft version of the London Plan which had undergone public examination. It was recognised that the Mayor intended to adopt the London Plan by the end of 2019. Officers also highlighted that the Mayor was not obliged to make any changes to the London Plan in response to any suggestions made by the inspector but would need to explain to the Secretary of State why he was not intending to do so if this were to be the case. It was also noted that the Mayor aimed to adopt a new London Plan before his term of office expired in Spring 2020.

In response to further questions, Officers clarified that further detail alongside a full schedule of those comments received through the public consultation on the Local Plan would be put to the Sub-Committee at future meetings. It was also noted that all of the comments made on the draft Plan were public and, as such, would be available on the City Corporation's public website shortly. Members noted that it would be particularly useful to see further detail on collective responses submitted by groups such as the CPA, GLA, Barbican Association and Historic England going forward.

A Member questioned how far reaching the consultation had actually been in terms of relevant stakeholders and how this differed to previous public consultations around the Local Plan. He went on to question whether Officers had examined where comments made on the Transport Strategy mapped in to this document given that many respondents would not necessarily differentiate between the two. It was also suggested that Officers consult the Air Quality consultation which had recently closed so that views expressed on these various different documents could be consolidated and synthesised. Members noted that work was currently progressing in terms of business intelligence software to assist in the collation of such responses/information.

Another Member recognised that it was apparent that there were some varying views on the Plan between residents and workers but went on to question how much was known in terms of the views of those using the City recreationally. He went on to reference the Fundamental Review which may affect the direction of travel in terms of the Corporate Plan and therefore have knock-on effects to this document in future. Officers recognised that this may be the case and the need for change could be considered once future corporate direction had been confirmed.

Members were in agreement with the point made around recreational use of the City/tourism. While noting that consultation drop-in events had taken place at the City Information Centre and other visitor venues, it was suggested that Officers consult with the City Corporation's Cultural & Visitor Development Director who had already undertaken a great deal of work around visitor perceptions of the City and produced a dedicated Visitor Strategy.

Members decided to discuss each of the key issues raised through public consultation as detailed within Appendix 1:

Vision and Objectives

Officers clarified that this was largely drawn from the Corporate Plan and that there had been overall support for this from both the business and residential community. As anticipated, some detailed points had arisen in relation to individual policies. The main concerns expressed by residents throughout had been in relation to the impact of development on residential amenity in terms of noise and pollution. There had been strong support for urban greening across the board. Responses from the business community had been more nuanced in terms of how urban greening might be delivered on buildings as opposed to around them.

Officers went on to report on the response received from Historic England which had been around the impact of development on the historic City, particularly in relation to the City Cluster. It was recognised that the consultation period had coincided with the Planning and Transportation Committee's consideration of 'The Tulip' application which may have added to the strength of opinion on this matter.

A Member spoke specifically on pollution and asked that there be further clarity around what was meant around this and what exactly the Plan would like to achieve/commit to in this area, recognising that this was a 20-year vision. He commented that, whilst transport contributed to approximately 50% of air pollution, combined heat and power (CHP) was also a major contributor. Another Member commented that if future legislation was passed around the use of CHP, another Committee would be responsible for acting on this. He went on to express concerns around the organisation still appearing to work in siloes in terms of cross cutting issues such as this which could prove problematic. He underlined the need to work collaboratively on such matters at both Member and Officer level going forward. The Chairman clarified that he was of the view that such matters were for the Chairmen and Deputy Chairman of respective Committees to discuss and take forward at political level. He added that he was confident that these discussions were taking place at Officer level but recognised that these sorts of issues clearly pervaded the organisation's well constituted/established areas. Officers clarified that documents such as the Local Plan, Transport Strategy and Air Quality Strategy were corporate documents and provided readers with the context in which various different 'siloes' operate.

A Member clarified that Air Quality currently featured on the Corporate Risk Register and was a risk owned by Environmental Health. It was also recognised that air quality was often strategic and that it was equally important to work alongside partners outside of the authority/Square Mile to address the matter going forward.

Strategic Policy S1: Healthy and Inclusive City

Given that there was general support for this across the board, the Policy had been moved to the first section of the draft Plan in order to give it more weight. Businesses, whilst supportive of the approach here, had submitted comments around the methodology to be used for Health Impact Assessments and

requested that some flexibility be introduced. The detail of these comments would be shared with the Sub-Committee at future meetings.

Residents comments here had been around residential amenity and how quieter areas might be introduced and maintained in order to mitigate the impact of development.

Officers reported strong support across the board with regard to air quality.

A Member referred to electric vehicles and questioned whether there were any implications around road safety given that these vehicles tended to be silent. He suggested that this was something that the City Corporation might want to take a view on in an attempt to influence any new legislation that could emerge in relation to this.

A Member, picking up on the comments made by developers around flexibility, stressed the need for the Plan to introduce actual standards. He stated that, if there were specific aspects that simply did not work for commercial buildings, these should be addressed with the goal being to enforce the best standards possible here.

Another Member questioned what feedback, if any, had been sought from the Corporation's own Health and Wellbeing Board on this. Officers confirmed that the Board had had sight of the draft Plan ahead of public consultation but stated that they would be happy to consult them further at this stage if that was felt to be beneficial. The Chairman of the Health and Wellbeing Board, who was also in attendance, reported that the Board had had a brief discussion around this, and the Health Impact Assessments with Board members comments invited via email. She seconded the view that the Plan needed to be firm in its intentions and clearly explain expectations to developers.

The Chairman requested that a more holistic approach be taken and proposed that the consultation with the Health and Wellbeing Board be formalised going forward, recognising that input into this process at both Member and Officer level would be useful from this group.

A Member suggested that it would be helpful for the Sub-Committee to have more information on Health Impact Assessments going forward alongside the development community's concerns and the City Corporation's views. He went on to refer to the ongoing problem of engine idling within the City and questioned whether this should also be reflected within the Local Plan. He highlighted that there was a lack of signage around the fact that there should be no engine idling in the City and that this impacted on the ability of officers to issue notices in relation to this. He suggested that the introduction of sufficient signage could therefore be a 'quick win' going forward.

Strategic Policy S14: Urban Greening

Officers reported that, again, there was general support for this across the board although some concern around deliverability had been expressed by

developers. Aside from this, the general view was that the Plan could perhaps go further/be stronger in this area.

Views had been expressed around the provision of open space within the City and that there should be more of this as opposed to greening of buildings. Views also suggested that, where open spaces did exist, these should be green. Officers went on to clarify that a policy on trees would be included within the final Plan and that there was overwhelming support for more planting going forward.

A Member, whilst recognising the need to maintain good relations with the development community, questioned whether it would be fair to conclude that they were generally not as ambitious/keen on some of these policies as the organisation would like. He underlined the need to understand their specific concerns and to bring them to the table so that they were very much part of this process and clear on the objectives and expectations going forward. He went on to question who was responsible for the Tree Strategy referred to by Officers and when this was last reviewed.

Officers reported that the Tree Strategy was a Supplementary Planning Document to the Local Plan which the Department of Open Spaces led on. Officers stated that this was a shorter-term document which was currently reviewed every 5 years but undertook to provide Members with a fuller update on this at a future meeting.

A Member questioned whether the lack of a specific policy on trees was the result of a recent planning application. Officers confirmed that no one specific proposal had generated this and that the draft Local Plan had attempted to address tree planting as part of the wider Urban Greening Policy. Additional emphasis on tree planting would be included within the final version of the Plan. The Member went on to state that Members should ensure that, where possible, the provisions of the Tree Strategy were carried through in terms of decisions made on relevant planning applications. The Chairman recognised that many would 'cherry pick' from the various policies but emphasised that it was also possible to have more than one policy in contradiction with another as had been the case with recent applications. Officers supported this point and highlighted that the wording within the Plan made it explicit that the document should be considered as a whole.

The Chairman supported the points raised in relation to the development community's comments. He recognised the need for bold politics but underlined that the organisation still needed to maintain an element of predictability. Officers clarified that the CPA were positively supporting bold improvements in the City but that, as they represented such a diverse group, there were some caveats here.

Transport

Strategic Policy S9: Vehicular Transport and Servicing

Officers clarified that many of the comments received were similar to those submitted as part of the public consultation around the draft Transport Strategy and that there was a lot of support for this policy area.

Comments received tended to centre around congestion, the need to tackle vehicle emissions and consolidation/freight movements. Members were informed that there was support from amongst the development community for this. However, the current 1,000 m² threshold for requiring consolidation was seen as too low. Officers underlined that consolidation could, however, take different forms and it was recognised that it might be helpful to clarify this further within the final version of the Plan.

A Member underlined the need to provide clarity with regard to consolidation requirements stating that he was yet to see any meaningful improvement in terms of this in the City. He stressed that the matter should also be pursued with existing buildings in the City and not just be a condition on new developments. He went on to note that there was support from those responding to the public consultation around encouraging greater use of the Thames for passenger and freight transport. He stated that there was a caveat here in that many boats were more high polluting than cars and that this was something that the Plan might also look to address alongside the Port of London Authority.

The Chairman clarified that he was of the view that freight consolidation should be delivered across the board with the Corporation's high aspirations on this clearly set out. Essentially, the City wanted to become a place that vehicles entered by invitation only with deliveries only permitted at certain times of the day managed by way of certain conventions/licences. It was also entirely possible that future technological advances would mean that the rationale for and value of journeys by vehicle could be assessed going forward.

A Member questioned how the 1,000 square metre figure had been arrived at and stressed that this threshold could potentially undermine work around consolidation given that a large percentage of City businesses were small businesses. Another Member seconded this view and stated that buildings of this size could struggle to set up consolidation sites. Where possible, a collaborative approach with other nearby buildings should be encouraged to achieve critical mass.

It was noted that freight consolidation was also addressed within the Transport Strategy.

Strategic Policy S10: Walking, Cycling and Healthy Streets

Officers confirmed that there was strong support for this with many respondents wanting the Corporation to move faster and deliver more in this area.

A Member commented that cycling behaviour in the City was a huge concern for many and suggested that Officers look at how this might be addressed and the impact it had on road safety.

Tall buildings, protected views and heritage assets

Strategic Policy S13: Protected Views

Officers reported that the key issue here was the impact of development in the City Cluster on views of the Tower of London and how any policy might protect this and other views such as those of St Pauls.

A Member referred to the definition of tall buildings in the City as being those over 75m which differed from adjoining areas. He questioned whether this was also the figure used in relation to the areas that were highlighted within the Plan as being inappropriate for new tall buildings. Officers confirmed that this was the figure used for the City as a whole, with the exception of riverside development where developments in excess of 25m were deemed unsuitable. Members requested that the final version of the Plan offer further explanation and clarification as to why the definition of tall buildings differed between the City and adjoining areas such as Islington and Tower Hamlets where tall buildings were defined as those over 30m.

Officers clarified that, whilst this was the figure used by way of definition, all applications were judged on their merits. A Member commented that it was important to note this point and that there was always a balance to be struck in terms of benefits versus harm.

A Member questioned the comments received by a number of businesses with regard to height limits being relaxed to provide additional public space at upper levels. Officers stated that this was a matter for Members to decide but that it was not something that they would recommend.

Strategic Policy S21: City Cluster

Officers reported that there was strong support for the consolidation of servicing and deliveries in this area. It was noted that some businesses considered that the City Cluster ought to be extended further than suggested in the Local Plan.

A Member referred to the comments within the report suggesting that both businesses and heritage bodies believed that the 3D modelling should be publicly available and sought the views of Officers on this. Officers stated that they had made it known for some time now that they were using 3D modelling but that this has never been put into the public arena to date. They felt that it was reasonable that this request was now being made.

Strategic Policy S23: Smithfield and Barbican

Officers reported strong support for Culture Mile. However, this had also attracted some concern in relation to residential amenity. Further information was also sought as to the potential future uses of Smithfield Market which was viewed as key to the future development of the area.

Members noted that many of the leases at the Market site expired in 2028 and that the Local Plan was intended to be a 20-year plan. Members stated that, whilst they recognised that there was still a lot to be decided, they were keen for Officers to say as much as possible publicly on the future of the Market site when the new Local Plan was published.

Officers responded that they intended to put 'hooks' in place within the Plan at this stage but commented that the Markets Consolidation Programme was still at too early a stage to provide site specific guidance in the Local Plan.

Strategic Policy S3: Housing

It was noted that no comments were received from house builders. Affordable Housing generated more comment with the Mayor of London pushing for more of this in the City and suggesting that the requirement should be increased to 50% in line with the London Plan, with the type reflecting what he felt was needed across London as opposed to what the Corporation's Community and Children's Services Department felt was needed for the City. Officers noted that a series of background documents on this would need to be produced going forward.

Members also noted concerns from residents around the fact that a greater emphasis was being placed on encouraging development rather than on residential amenity. A Member questioned whether it would be possible to have something in the relevant policy going forward to require developers to consider space for healthcare provision/a GP surgery as desirable. The Chairman agreed that this would be a good idea.

Members went on to comment on the fact that the City Corporation was currently one of the authorities on a list of underperformers in terms of meeting housing targets and questioned whether Officers were concerned that the organisation was likely to remain on this list. Officers reported that an action plan would be submitted to the Planning and Transportation Committee in July 2019 and that they were confident that the City Corporation would be able to meet the set targets for the next few years. Beyond this, the organisation would be dependent on other 'windfall' sites coming forward.

Strategic Policy S5: Retailing

A Member commented that he felt that it was vital to provide additional retail floorspace and suggested that the Plan could look to adopt a more granular approach as to the type of retail that was desired and be smarter about what was encouraged.

Other Key Areas of Change

Officers outlined that a full schedule of comments on each of the key areas would be brought to future meetings of the Sub Committee.

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.

The meeting ended at 12.36 pm

Chairman

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