

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 19/07/2019
Subject: City of London Local Plan Review: strategic issues and potential Plan changes following public consultation	Public
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Summary

The draft City Plan 2036 was issued for public consultation during November 2018 to the end of February 2019. At the previous meeting of this Sub-Committee on 17 May 2019, Members received an initial report on the outcome of the public consultation and set out their views on some of the key issues raised during the consultation.

The next stage in the Local Plan review process is to prepare responses to all the consultation comments received and to agree revisions to the draft Plan, which will then be published for a final stage of consultation likely to be in early 2020. The majority of comments received during the draft Plan consultation were either broadly supportive in nature or suggested relatively minor wording changes, and a full schedule of these will be presented to the Sub-Committee after the summer recess.

This report focuses on certain strategic issues in the draft Plan where consultation responses suggested either a significant change in policy approach or identified a policy conflict. The report outlines potential options in relation to each of these issues, including additional evidence that may need to be gathered, and seeks the views of the Sub-Committee on which options Members would wish to pursue.

Recommendation

Members are recommended to:

- Give their views on the options outlined in Appendix 1 of this report.

Main Report

Background

1. At its meeting on 30 October 2018, the Planning & Transportation Committee approved the draft Local Plan for public consultation. This followed careful consideration of the planning issues facing the City and scrutiny of proposed policies through the Local Plan Sub-Committee during 2017 and 2018.
2. The draft Local Plan was published for consultation alongside the draft Transport Strategy on 12th November 2019, with the consultation period closing on 28th February 2019. An extensive and wide-ranging programme of engagement was

undertaken, which was summarised in the report considered at the previous meeting on 17 May 2019 together with an analysis of the main issues raised through the consultation process.

Draft Plan Public Consultation Response

3. A total of 181 responses were received to the consultation, making approximately 900 individual comments. In addition, a range of comments were made through public and stakeholder meetings and through a youth engagement workshop which are not recorded or attributed as individual comments but will be considered in making amendments to the Plan.
4. At the May meeting, Members asked for a breakdown of who responded to the consultation. Unfortunately, a detailed breakdown cannot be provided because personal details such as age, gender, ethnicity etc were not required to be provided for data protection reasons. A number of comments were submitted through social media channels or were handed in at drop-in events and, although they are valid comments on draft policy, they have generally provided little detail of the background of the respondents.
5. It is possible, however, to broadly estimate the proportion of responses that were made by residents, workers and visitors as well as by organisations, and those details are shown in the table below:

Category	Respondents	Percentage
Residents	42	23
Workers	44	24
Visitors	12	7
Businesses, developers and landowners	22	12
Amenity groups and residents' associations	15	8
Statutory bodies, e.g. local authorities	18	10
Social media responses	23	13
Academics/students	5	3
Total	181	100%

6. It is intended to upload a summary of each of the comments received onto the City Corporation's website in advance of this meeting. The comments will be uploaded to the following web page: www.cityoflondon.gov.uk/cityplan2036

7. Comments were received on all aspects of the draft Plan and there was no single, dominant theme. The majority of comments received were either broadly supportive in nature or suggested relatively minor wording changes. A full schedule of comments received, together with officers' recommended draft responses, will be presented to this Sub-Committee in the autumn.

Strategic issues

8. This report focuses on those key strategic issues which emerged from the draft Plan consultation, particularly those matters where consultation responses suggested a significant change in policy approach or identified a policy conflict.
9. It is important to consider these strategic issues first because decisions taken in respect of them will have knock-on consequences for other parts of the Plan. In addition, some respondents requested additional evidence to be prepared which could have implications for the overall Plan timetable.
10. Appendix 1 of this report identifies the following strategic issues:
 - Housing delivery and affordable housing;
 - Residential environment, including daylight and sunlight;
 - Office delivery, affordable workspace and loss of office space;
 - Culture, visitors and the night-time economy, including hotel provision;
 - Freight and servicing;
 - Tall buildings, including their definition and location and public space provision;
 - City Cluster Key Area of Change;
 - Smithfield and Barbican Key Area of Change and Culture Mile;
 - Definition of major development and policy thresholds.
11. Under each of these headings, the report briefly summarises the nature of the consultation comments received and identifies a range of options in response to those comments. Officers have made recommendations against the options identified and outlined the scope of any additional work and changes to the Plan that may be required. Members are asked to consider each of the recommendations and indicate whether they agree with them.
12. Following the meeting, officers will work up agreed changes to the Plan and will present these to the Sub-Committee for approval in the autumn, alongside other more minor Plan changes. The process of preparing a revised Plan will also be influenced by new evidence (paragraphs 13 – 15) and by any changes to London planning policies (paragraph 23). A new Planning Green paper has been

promised by the Government and this, together with any other changes to national planning policy, may further impact on the Local Plan.

Evidence base

13. The policies in the draft Plan were informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. Amongst the evidence published to support the draft Local Plan consultation were studies relating to the office market; retail needs; urban greening; flood risk; housing need; waste arisings and transitioning to zero carbon by 2050.
14. Further evidence is being gathered through the summer and autumn to support the next iteration of the Local Plan. This will an Infrastructure Delivery Plan, which will identify the infrastructure required to deliver the Local Plan and examine where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Another key piece of evidence will be an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile.
15. Some additional work may be required to ensure that the Plan submitted to the Secretary of State for examination is founded on robust and up-to-date evidence. Appendix 1 sets out in broad terms the additional evidence that may be needed to support certain Plan policies, which will vary depending on the nature of the options selected.

Integrated Impact Assessment

16. The draft Plan was informed by a draft Integrated Impact Assessment (IIA), which combined the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.
17. IIA is an iterative process and further assessment will need to be undertaken of any significant changes that are made to the draft Plan before it is published for the next round of consultation. The IIA is produced in-house but is being independently audited by consultants.

Next steps

18. In the autumn the Sub-Committee will be asked to consider proposed changes to the Plan and recommend that the revised Plan be approved by the Grand Committee, Policy & Resources Committee and Court of Common Council for further public consultation and submission to the Secretary of State for examination.

19. Two further meetings of this Sub-Committee have been arranged in September and October as follows:
- 20th September – to consider a full schedule of proposed changes to the Local Plan in response to the consultation;
 - 9th October – to consider the full revised plan for approval and recommendation to the Grand Committee.
20. A provisional meeting has also been arranged for 9th September. Given the number of potential changes to be considered across the whole Plan, it is considered that this additional meeting is likely to be necessary to ensure Members have sufficient time to properly scrutinise the changes.
21. Following consideration by the Sub-Committee, the current target dates for Committee approval are:
- Planning & Transportation Committee on 5/11/2019
 - Policy & Resources Committee on 21/11/2019
 - Court of Common Council on 5/12/2019
22. The next stage of consultation will take place in early 2020 and is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. There is very little opportunity for the City Corporation to make further changes to the Plan in response to such objections. Instead, the Plan and any comments received are examined by an independent inspector appointed by the Secretary of State. The inspector will subsequently issue a report on the examination, which may include recommended modifications to the Plan. Subject to the availability of an inspector, the examination hearing is likely to be held in early summer 2020, with adoption of the Plan later in 2020 or early 2021.
23. The timetable outlined above will be kept under review and may be affected by the outcome of the London Plan Examination in Public (EiP). The EiP hearings finished in May 2019 and the Panel's report is expected to be sent to the Mayor in September. The Mayor then has up to 8 weeks to publish the report and to send a copy to the City Corporation and the London boroughs. Your officers are liaising with officers at the GLA and will update Members in September on whether the City's Local Plan timetable should be adjusted in light of the London Plan's progress.

Corporate & Strategic Implications

24. The review of the Local Plan is informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan outcomes. The draft Plan provides a spatial planning framework to support the four key corporate capital projects, along with proposals to ensure a sufficient future supply of business space by extending the City's tall building cluster. The emerging Plan aligns with the adopted Transport Strategy.

Appendices

- Appendix 1 – key strategic issues

Background Papers

Report to Planning & Transportation Committee 30/10/2018: City of London Local Plan Review: Proposed Draft Plan

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