

Appendix 1 – key strategic issues

Strategic Policy S3: Housing

Representations were evenly divided between residents and statutory or amenity bodies, with relatively few comments from the business sector. With the exception of a student housing provider, no responses were received from housebuilders or residential development promoters.

There was support for the overall housing target of at least 146 dwellings a year, including from Mayor. This target aligns with the draft London Plan.

The Mayor has indicated a need to provide greater certainty on future housing provision in the City, suggesting that the City Corporation allocate sites or provide greater certainty that new residential development will come forward to meet London Plan targets.

In general, residents and the Mayor were supportive of on-site affordable housing provision and the need to provide greater certainty. Developers have argued for greater policy flexibility for off-site contributions.

The Mayor would like closer policy alignment with the London Plan regarding affordable housing delivery, including reference to the Mayor's strategic 50% target. The Mayor also indicated that there should be reference to City delivery on out of City estates (where a minimum of 50% is expected by the Mayor).

Options – S3 housing delivery	Officer comment
No material changes to draft policy or supporting text	Not recommended given the GLA's comments and the City's performance in the Government's first Housing Delivery Test (published Feb 2019) – the City only delivered 42% of the Government's assessment of dwellings required in the 3 years to 2017/18.
Provide additional detail in the supporting text on expected sources and timing of housing supply during the Plan period, including supply on City sites outside of the City's geographical area	Recommended. Much of this work has already been done for the City's Housing Delivery Test Action Plan. An evidence report will provide: an indication of level of new housing expected from small and large sites; reference past trends in delivery to demonstrate that the City has met and exceeded London plan targets; provide further information on the current planning pipeline (taken from Housing Delivery Test), which demonstrates over 6 year's supply of housing; provide information from the City's Strategic Housing Market Assessment on dwelling size and tenure needs.

	Further text will be added on proposed development on City estates (700 homes target) and the City's strategic target for an additional 3,000 homes.
Modify current policy approach to adopt a more flexible approach for office to residential conversions within existing residential areas	Not recommended. Relaxing the policy emphasis on office floorspace, even if confined to existing residential areas, would represent a significant change in Corporation planning policy. Sites already under construction mean that housing delivery is expected to exceed the London Plan target in the next few years. However, in the longer term (through future reviews of the Plan), this option may need consideration if further housing sites do not come forward as 'windfalls'.
Identify/allocate specific site(s) in Plan	City Local Plans have not previously allocated sites, relying on windfall development as opportunities arise. While this approach does not reflect national policy, it has been endorsed by successive Local Plan inspectors in view of the City's unique circumstances. No sites in the City were identified in the London Plan 'Call for Sites' undertaken by the GLA and the Corporation received no representations from housebuilders during the recent draft Plan consultation. If acceptable site(s) could be identified, this would provide reassurance to the GLA and potentially to a Planning Inspector at Examination. However, it would delay the Local Plan as we would need to consult on the site(s) to give other landowners an opportunity to put forward alternative sites for consideration.
Options – S3 affordable housing	
No material changes to draft policy, but provide greater clarity in the supporting text on how 35% will be delivered, including further explanation of how Mayor's Threshold Approach will work in the City	Recommended. The Mayor's Threshold Approach, set out in the draft London Plan, would exempt schemes that provide a minimum of 35% affordable housing from the need to provide viability evidence and could incentivise delivery of on-site

	<p>affordable housing in the City. Amendments to the supporting text will need to reference the London Plan's 50% strategic target for affordable housing and the expectation that future development on City-owned estates will aim to deliver at least 50% affordable housing.</p>
<p>Adopt Mayor's 50% strategic target for developments in the City (subject to viability)</p>	<p>Not recommended. Recent experience indicates that high development/build costs and the absence of grant funding would make such a target extremely difficult to achieve in the City. Affordable housing delivery has averaged just under 30% in recent years. The supporting text will make reference to the wider 50% target.</p>
<p>Introduce greater policy flexibility for off-site contributions</p>	<p>The NPPF and the London Plan indicate that off-site contributions should be the exception rather than the norm. The Sub-Committee was clear during preparation of the draft Plan that it wished to see a policy emphasis in favour of on-site affordable housing provision. The potential for off-site provision will remain as an exception.</p>

Policy H3: Residential Environment

There was some concern from individual residents and residents' organisations about the impact of Local Plan proposals on residential amenity. Amendments to policies were suggested to provide stronger protection for residents, including:

- Restrictions on on-street activities (particularly referencing Policies S24 Culture Mile Implementation and SB1: Culture Mile Impacts).
- Suggestions that a more restrictive approach to development, particularly night-time entertainment, be implemented around the four main residential Estates.
- In relation to daylight and sunlight (linking to Policy D8: Daylight and Sunlight), a need for greater clarity over how daylight and sunlight assessments will be undertaken and applied to protect residential amenity. On the other hand, there were some calls for greater flexibility in the policy to reflect the City centre context from developers.

Options – H3 uses and activities	Officer comment
No material changes to draft policy but amend the supporting text	Recommended. There are limitations on what can be achieved through planning control, as much of the concerns were around on-street activity rather than buildings. The supporting text will be amended to provide more detail on the need for effective management plans, the Agent of Change principle and links to other Corporation strategies. There should be cross reference between Policies HIC3, H3 and C4.
Take a more restrictive approach to on-street activities in and around residential areas	Not recommended. Much of the delivery of on-street activity is outside of planning control and the remit of the Local Plan. The Local Plan should reference other City Corporation strategies e.g. the Culture Mile Look and Feel Strategy, the Noise Strategy and the City's approach to street trading, but cannot control uses through planning.
Take a more restrictive approach to development in and around the main residential areas	Not recommended. While benefitting residential amenity, such an approach is considered unrealistic given the need to make efficient use of land and is likely to conflict with other policy objectives to support the business City and strengthen

	the City's cultural offer. In principle, the Agent of Change approach and the requirement for management plans should ensure that night-time entertainment developments should not have an adverse impact on residential amenity.
Options – D8 daylight and sunlight	Officer comment
Clarify in policy that BRE will be applied consistent with a city centre context and provide greater explanation in the supporting text of how it will be applied - possibly defining minor, moderate and major impacts and including reference to assessment against retained light levels	Recommended. It is considered that the current policy approach has been broadly effective in balancing the needs of the business City against the protection of residential amenity, albeit that the BRE methodology has some limitations in a dense urban environment and needs to be interpreted flexibly. Changes could be made to assist the understanding and implementation of this policy, clarifying that it will be applied in a way consistent with a City centre context. This would also require changes to supporting text to provide greater explanation of how the policy would be implemented.
Seek to develop a new assessment methodology based on dense urban areas rather than relying on BRE methodology	Not recommended. Further work is being undertaken to understand whether there are particular City specific circumstances that need to be taken into account. This is likely to require detailed assessment and joint working with consultants, developers and residents and would significantly delay the Local Plan is progressed. At present, the technology does not exist to fully represent at the planning application stage how changes in daylight and sunlight are actually experienced by occupants. As this emerges, such assessment improvements could be reflected in a Supplementary Planning Document.

Strategic Policy S4: Offices

Approximately half the comments received were from developers and businesses, with the remainder shared between residents and statutory bodies. There was concern from a few residents over the scale of office growth projected in the Plan and whether an ambition for 2 million square metres of additional floorspace was realistic in the light of Brexit and the move towards more agile and dense workspaces.

The Mayor supported the overall approach but considered that there needs to be greater certainty over where new office development will be located, and evidence that the floorspace target will be met. The Mayor's comments suggested that office development sites should be identified.

The Mayor, Islington and Hackney suggested that there should be specific support for subsidised affordable workspace to complement the London Plan and neighbouring borough Local Plans. If there is no policy, these authorities consider that the City Plan should be more explicit on how the approach in the City will complement those in adjacent boroughs.

In relation to Policy O2: Protection of existing office floorspace, developers and the CPA have suggested more flexibility is needed, particularly around the requirement that properties should demonstrate marketing for continued office use over a period of 18 months.

Options – S4 office delivery	Officer comment
No material changes to draft policy or supporting text	Not recommended. Given the GLA's comments, it is considered that more information is required to demonstrate need for and delivery of office floorspace. This evidence will also be required to demonstrate deliverability of Local Plan policies at Examination.
Provide additional detail on expected sources and timing of office delivery during the Plan period, such as distribution of new office floorspace across the City, both in text and evidence documents	Recommended. More detailed evidence will be published setting out the justification for the 2m sqm floorspace target. Supporting text should be amended to provide more detail about where new office development will take place, updating Table 2.3 in the current Local Plan. Further information will be provided on the office development pipeline, referencing schemes which have been agreed by Committee but do not yet have formal planning permission. Further supporting text could be

	added addressing issues of economic uncertainty, highlighting the need for further review if there is significant change in the office market.
Modify current office floorspace target from a single numerical target to a broader range	Not recommended. The current target approach already provides flexibility for adjustments to the 5-year phasing and provides a clear framework for monitoring progress on an annual trajectory. The current target is already in the middle of a range of outcomes.
Identify/allocate specific site(s) in Plan	Not recommended. The long-standing approach in the City has been that all sites are potentially suitable for office development. This approach is supported in the London Plan, through its policies for the Central Activities Zone, which emphasise the beneficial cluster of financial and professional services in the City.
Options – S4 affordable workspace	Officer comment
No material changes to draft policy or supporting text	Not recommended in light of the comments from the GLA and neighbouring boroughs.
Provide more detail on the types of workspace being sought and how this might complement neighbouring boroughs – this could be an extension to existing policy approaches, with explanation in the text	Recommended. Minor changes are proposed to Policy S4 to clarify references to affordable and flexible floorspace. The supporting text should reference: the rental differential between the City and Westminster making the City a more attractive office destination; support from the City Property Advisory Team for companies looking to locate in the City; the range of office types and prices, including Grade B space, which can address some needs; the significant growth in serviced office provision which provide flexible and adaptable space and flexible leases/rents for smaller

	businesses. To address comments from the Mayor and neighbouring boroughs, the text should address the potential for complementary approaches with neighbours, e.g. providing potential move-on accommodation
Introduce a policy that requires a proportion of subsidised workspace to be provided within larger office developments	Not recommended. There is no substantive evidence of a need for subsidised workspaces in the City, including within the Culture Mile area. The City's CPAT Team already provide significant support to companies looking to locate in the City and flexibility of accommodation and lease arrangements are considered to be the key factors in the City.
Options – O2 protection of existing office floorspace	Officer comment
No material changes to draft policy or supporting text	Not recommended. There have been objections to the proposed 18-month marketing period requirement and there is no local evidence to suggest that this would be an appropriate time period or would provide greater protection for existing office accommodation.
Modify requirement for marketing, but retain strong policy presumption against loss of office floorspace (effectively reverting to current Local Plan approach)	Recommended in part. Suggest removal of formal marketing period but retain the policy requirement for changes of use to be supported by evidence of marketing. Further guidance on appropriate marketing could be set out in a revised Office Use SPD. The Sub-Committee indicated during preparation of the draft Plan that it wished to move away from a solely viability-based approach to the loss of office floorspace.

Strategic Policy S6: Culture, Visitors and the Night-Time Economy

Two key issues emerged from the consultation:

Policy C3: Hotels. There was concern from the development industry that the policy restricts the potential for hotel development and that there needs to be a more supportive policy.

On the other hand, residents raised concerns about the impact of hotel development on residential amenity, particularly in and around the Culture Mile area.

Policy C4: Evening and Night-Time Economy. Developers (including the CPA) raised concerns about the detailed implications and deliverability of the policy, e.g. around the production of management plans at the application stage (when occupiers may be unknown). There is also concern that the policy does not sufficiently recognise the importance of the night-time economy to the overall economy.

Residents raised concerns about the impact of the night-time economy on residential amenity. This links to concerns about Culture Mile and its impacts on the Barbican and Golden Lane estates but extended wider to included residential properties in other parts of the City.

Options – C3 Hotels	Officer comment
No material changes to draft policy or supporting text	Not recommended. Consultation revealed concerns about the draft policy and several neighbouring boroughs appear to be adopting a more restrictive policy approach towards new hotels. In that context, the City may need to adopt a more supportive position, particularly to service the Culture Mile.
Adopt a more supportive policy approach, e.g. a more flexible approach to office to hotel conversions. This could be City-wide or within specific areas, e.g. Smithfield/Barbican KAOC to service Culture Mile	Recommended in part. The Local Plan should recognise that its cultural ambitions need to include making appropriate allowance for hotel accommodation for visitors, alongside accommodation for businesses. The existing Local Plan approach of concentrating hotels in areas close to the Tower of London and St Paul's Cathedral could be retained, alongside a more supportive approach around Culture Mile. Specific reference could be made in the text to the opportunities for hotel development in listed buildings, e.g. the Ned.

Adopt a more restrictive policy approach, e.g. resisting hotels in and around the residential areas	Not recommended. Restricting hotel development in principle in appropriate locations would appear to be contrary to the City's cultural ambitions. Each scheme should be considered on its merits taking account of the local context.
Options – C4 Evening and night-time economy	Officer comment
No material changes to draft policy, but provide further guidance within the text on the Agent of Change principle	Recommended. It is considered that the draft policy strikes a reasonable balance between the promotion of the night-time economy and the protection of residential amenity. Further guidance on how the Agent of Change principle will operate should be set out, together with cross reference to other policies in the Plan – HIC3 and H3.
Adopt a more flexible policy approach, e.g. allowing some design and management issues to be agreed by planning condition	Not recommended. It is acknowledged that the end occupiers are not always known at the planning application stage, but it is important that physical and operational measures to reduce potential disturbance and anti-social behaviour are considered at the earliest possible stage of the design process to avoid the need for later retro-fitting.
Adopt a more restrictive policy approach, e.g. resisting night-time uses in and around the residential areas	Not recommended. NPPF and London Plan policy includes the Agent of Change principle which would require new night-time entertainment uses to put in place measures to prevent disturbance to residents. Greater restriction on the location of such uses is unlikely to be deliverable in light of this new approach or the emphasis given to the night-time economy in the Draft London Plan and the Mayor's Night-Time Economy SPG.

Strategic Policy S9: Vehicular Transport and Servicing

There was concern from parts of the development industry, including the CPA, about the requirements for freight consolidation. This centred on the fact that the draft policy required consolidation for all major development, defined as development of 1,000 m² gross floorspace or more. Developers suggested that physical consolidation should be limited to buildings over 10,000 m² and that policy should explicitly reference the potential for 'virtual' consolidation (which involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building).

There was some concern from residents regarding the potential adverse impacts of evening/night-time freight deliveries and servicing on residential amenity. In addition, the development industry expressed some concerns that the policy needed to acknowledge the additional costs of servicing overnight.

Options – S9 freight and servicing	Officer comment
No material changes to draft policy, but clarify that policy relates to physical and virtual consolidation	Recommended. Further guidance should be provided on the City's requirements and the benefits to business of consolidation. This could include cross-reference to the Transport Strategy and Action Plan. Emphasising the need for all development to consider consolidation, either physical or virtual, would provide policy support for Transport Strategy ambitions.
Introduce a higher threshold for physical consolidation	Recommended. Requiring physical off-site consolidation for smaller developments could impact on their deliverability. However, this should be seen alongside the requirement for all development to consider consolidation in some form (see above). In liaison with the Transport Strategy Team, consideration will be given to a potential higher threshold.
Modify policy to only require evening/night-time/weekend deliveries and servicing in certain areas (e.g. City Cluster)	Not recommended. The draft policy already indicates that late evening and weekend deliveries should not apply in residential areas. Any further exemptions could undermine the delivery of some of the Transport Strategy's objectives.

Strategic Policy S12: Tall Buildings

This policy attracted a relatively large proportion of comments, spread across residents, workers, the development industry, statutory and amenity bodies and social media comments.

The Mayor and some neighbouring boroughs raised questions about the definition of tall buildings and whether the City's definition should be more closely aligned with those in other boroughs. The Mayor indicated that the Plan should define a lower height in the Thames Policy Area.

Figure 19, which illustrates areas inappropriate for tall buildings, attracted a lot of comments. The Mayor, Tower Hamlets, Historic Royal Palaces, Historic England and residents have suggested that Figure 19 needs to be amended to provide greater clarity. In particular, it was argued that it should identify London Views Management Framework background settings as inappropriate and recognise that tall buildings are inappropriate around the Barbican and Golden Lane Estates.

The draft London Plan requires boroughs to identify where tall building clusters may be an appropriate form of development (not just areas where they are not) and to indicate the general building heights that would be considered appropriate in these locations. It was suggested that evidence could include further detail of the City's 3D modelling. However, some developers sought greater flexibility for tall buildings outside areas such as the City Cluster, arguing for instance that they may not always be inappropriate in conservation areas.

The development industry, including the CPA and British Land, raised concerns about the provision of public space around and within tall buildings, particularly at upper levels. Developers are concerned about the requirement for publicly accessible spaces at the top of tall buildings, alongside providing space at ground level and through buildings.

Options – S12 definition and location of tall buildings	Officer comment
No material changes to draft policy but make changes to the supporting text	Recommended. While much of the policy wording is considered to be robust, the issue of what constitutes an appropriate or inappropriate area for tall buildings appears to have caused some confusion. Changes to Figure 19 in particular, together with changes to the supporting text are required to provide greater clarity (further detail is set out below).
Introduce a more nuanced approach to defining tall buildings, e.g. higher threshold in City Cluster and/or lower along the riverside	Not recommended. The definition adopted reflects the monitoring definition used by the City for a number of years and has the

	<p>advantage of being clear and consistent. It does not mean that buildings up to 75m would be permitted on the riverside. However, it should be made clear in the supporting text that the height of development in areas impacted by strategic and local views will be determined by views considerations. Reference should also be made in the text to the requirement to refer schemes over 150m City-wide to the Mayor, except along the Thames, where the threshold is 25m.</p>
<p>Change the policy emphasis by identifying areas where tall buildings would be appropriate rather than inappropriate, reflecting approach in Draft London Plan and revised guidance from Historic England</p>	<p>Not recommended. The draft Plan already identifies the City Cluster as the most appropriate area for tall buildings in the City (para 6.5.5). Adopting such a policy approach may provide greater clarity over where tall buildings would be permitted but would reduce flexibility and the ability to consider other more local townscape, transportation and public realm issues. Not all sites in areas where tall buildings are appropriate in principle will be suitable for tall buildings. Whether or not a particular site is appropriate for a tall building is dependent upon the site context and requires a more granular level of assessment than would be desirable in a Local Plan. However, if Members are minded to explore the implications of this option in more detail, officers could undertake further work over the summer and report back in September/October on how such an approach might work in the City.</p>
<p>Options – S12 public space and tall buildings</p>	<p>Officer comment</p>
<p>Modify the draft policy to better reflect the wording in para 6.5.10, which emphasises a wider range of potential public uses than viewing galleries</p>	<p>Recommended. Additional flexibility should be introduced to better reflect the wording in para 6.5.10, which indicates that accessible public space at upper levels may comprise features such as retail, leisure or</p>

	educational facilities or areas of open space including roof gardens or public viewing galleries. The policy should also make clear that open space could be provided at various levels of a tall building, not necessarily always at the top.
Modify policy to remove the requirement to provide publicly accessible spaces facilities at upper levels of tall buildings if they provide demonstrable street level enhancements	Not recommended. The City Corporation has been very successful in achieving publicly accessible space at the upper level of tall buildings. Removing this requirement will make it difficult to achieve further spaces and could impact on the deliverability of spaces already permitted but not yet constructed.

Strategic Policy S21: City Cluster

Many of the comments made in relation to tall buildings also related to the development of tall buildings in the Cluster. Cluster specific issues included:

- The CPA and a few landowners/developers suggested further extension of the Cluster (south and along Fenchurch Street and north of Wormwood Street) to permit additional tall buildings.
- A mix of views on whether the City Cluster should continue to be shown in notional form in the Local Plan or whether a specific boundary should be identified.
- Comments from some occupiers, residents and workers about the need for stronger policy support for public realm and transportation improvements to facilitate continued development and intensification.

Options – S21 City Cluster Key Area of Change	Officer comment
No material changes to draft policy	Recommended in part. The policy itself was broadly supported in principle. The area is intended to be indicative.
Extend the City Cluster area further to the north and/or south	Not recommended. The area of the City Cluster as shown in the KAOC diagram is indicative. Not all sites within the Cluster are suitable for tall buildings and appropriate sites outside the Cluster could be suitable. The shape of the Cluster reflects 3D modelling work, and this could be further explained in the supporting text.
Define a boundary for the City Cluster and show this on the Policies Map	Not recommended. This is intended to be an indicative boundary, as are all the KAOC's. The issue of where tall buildings should be located, which underpins the requests for a definitive boundary, could be addressed by changes to the tall buildings policy and Figure 19. Local Plan policy allows tall buildings to be developed in appropriate locations outside of the City Cluster.
Adopt a more formulaic approach which seeks to match the delivery of open space and public realm improvements to new floorspace	Not recommended as this is considered too prescriptive to reflect the variety of site circumstances found within the Cluster.

	Nevertheless, additional detail on proposed transport and public realm improvements should be added to the Plan, reflecting the Transport Strategy and Action Plan and the City Cluster Vision.
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Strategic Policies S23: Smithfield and Barbican; S24 Culture Mile Implementation; and S25 Smithfield

A range of comments were received regarding the proposals for Smithfield Market and Culture Mile, and potential impacts on residential amenity:

- Residents, while generally supportive of cultural uses in principle, expressed concerns over the potential impacts of increased visitor numbers, night-time entertainment and on-street activities.
- On the other hand, the proponents of the Culture Mile and some others sought a greater emphasis on outdoor performance and animation of key routes/streets.
- A view was expressed that the Plan places too much emphasis on cultural activity in this area to the detriment of other parts of the City.
- Some Barbican residents commented on the emerging proposals for the Centre for Music, which attracted a mix of opposition and support in principle (subject to no impact on residential amenity).
- St Paul's would like to see a policy commitment to improve the route between The Barbican and Tate Modern via St Paul's as part of its proposals for a 'World Square'.
- Comments were received about the need for the Plan to provide greater certainty over the future use of Smithfield Market. There was comment from market traders that the Plan should continue to support the market in its current location.

Options – S23, S24 & S25 Smithfield and Barbican Key Area of Change/Culture Mile	Officer comment
No material changes to draft policies	Recommended in part. The draft policies are not considered to require major revision, but some changes are recommended as summarised below.
Modify draft policies to provide greater emphasis on the protection of residential amenity	Not recommended. Policy SB1: Culture Mile impacts already addresses a range of amenity issues. Other policies in the Plan (Policies HIC3, H3 and C4) provide further protection for residential amenity. Further supporting text should be added to reassure residents that the major projects will be required to undertake detailed assessment of issues such as noise, trip generation and pedestrian flows and to identify appropriate mitigation of any adverse impacts.

<p>Introduce policy guidance on preferred future uses of Smithfield Market</p>	<p>Recommended. Policy should not be prescriptive at this early stage in the process. However, given the significance of this site to the Corporation's aspirations for the whole area there is a rationale for incorporating some additional wording on future uses within the Plan, supplemented by later area-specific guidance. Officers are working with the City Surveyor to consider appropriate wording.</p>
<p>Commit to preparing more detailed area-specific guidance on Smithfield Market to support the Plan policies, e.g. Supplementary Planning Document or planning brief</p>	<p>Recommended. A site of this size, significance and historic interest will require area-specific guidance to ensure that planning, transportation and public realm challenges are effectively addressed and that opportunities are fully realised.</p>

General Comment

Across a number of policies, there were comments from the CPA and some landowners/developers about the definition of major development in the Plan and whether a single definition of 1,000 m² is appropriate for all policy aspirations, e.g. for freight consolidation and meeting certain sustainability standards.

Options – major development / thresholds	Officer comment
Retain single definition of 1,000 m ² appropriate for all policy aspirations	Not recommended. The definition of major development in the draft Plan reflects the NPPF and the London Plan and should be retained. However, some flexibility should be introduced for specific policies where a threshold of 1,000 m ² could impact on the deliverability of development.
Introduce a more nuanced approach with different thresholds for different policies	Recommended in a limited number of cases. Specific examples could include the threshold for requiring physical off-site consolidation and for requiring retail impact assessments.