

Committee(s): Local Plans Sub (Planning and Transportation) Committee	Date(s): 03/02/2020
Subject: City of London Local Plan Review: Proposed Submission version of City Plan 2036	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Decision
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Summary

The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. During the summer this Sub-Committee considered the main issues raised during the consultation and gave a steer to officers on the way forward in relation to a number of key strategic topics. Officers have now drafted a revised version of the Plan, known as the Proposed Submission City Plan 2036, which will be subject to a further final round of public consultation during 2020 before being submitted to the Secretary of State for examination.

This report highlights the main changes that are proposed to the earlier November 2018 draft Plan and includes those sections of the Plan which were not considered by the Sub-Committee at its last meeting on 14th January 2020. Many of the changes have arisen in response to comments received during the public consultation, but some have been included to reflect changes to the emerging London Plan or to national guidance since the draft Plan was published. In addition, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.

This report also includes changes suggested to address comments made by Members at the Sub-Committee meeting on 14th January 2020. Members are asked to agree that the sections of the Proposed Submission City Plan 2036 set out in this report can go forward to the Grand Committee for consideration in March.

Recommendation

Members are recommended to:

- Agree the sections of the Proposed Submission City Plan 2036 set out at Appendices 1 and 2 of this report; and
- Authorise the Director of the Built Environment to make further minor editorial changes and non-material additions to the Proposed Submission City Plan 2036 as necessary prior to its consideration by Planning and Transportation Committee.

Main Report

Background

1. The draft City Plan 2036 was issued for public consultation between November 2018 to the end of February 2019. Approximately 900 written comments were received from 180 respondents, along with informal comments collected at workshops and meetings. A summary of each of the written comments received is available on the City Corporation's website at www.cityoflondon.gov.uk/cityplan2036.
2. This Sub-Committee met on 17th May 2019 to consider the main themes raised during the consultation and on 19th July 2019 to consider strategic issues and potential Plan changes. The July meeting focused on those issues where consultation responses suggested either a significant change in policy approach or identified a policy conflict. Members considered potential options for each of those issues and provided officers with a steer on the appropriate way forward.
3. During the autumn, officers have drafted changes to the Plan in response to comments received during the public consultation and reflecting the steer provided by this Sub-Committee. In addition, officers have had regard to recent extensive updates to national planning practice guidance and to publication of the Mayor's final proposed changes to the London Plan in December following receipt of the Examination in Public Panel Report in October. None of the changes made to the London Plan by the Mayor have fundamentally altered the strategic context for the City of London and while it is possible that the Secretary of State could make further changes, it is considered that there is now sufficient certainty about the likely content of the new London Plan to be able to progress the City's Local Plan towards submission and examination.

Proposed Submission City Plan 2036

4. Attached at Appendix 1 of this report are those sections of the Proposed Submission version of City Plan 2036 which were not considered by the Sub-Committee at its last meeting on 14th January 2020. They comprise:
 - Section 4.2 (Safe and Secure City), which has now been considered by the Senior Security Board;
 - Section 7 (Key Areas of Change), which sets out policies relating to seven identified areas of the City which are likely to experience significant change over the Plan period. This section also includes an overarching policy which applies to the whole of the City's riverside.
 - Section 8 (Implementation), which contains policies relating to planning contributions and viability appraisals.
5. The document at Appendix 1 identifies the changes to the draft Plan, with deletions shown in crossed out bold text and additions in bold underlined text, to enable Members to easily identify where changes have been made and to

focus discussion on those changes. As well as responding to consultation comments, national planning guidance and the emerging London Plan, the opportunity has been taken to factually update the Plan, correct typographical errors and more generally to improve wording flow and clarity.

6. Copies of updated maps and diagrams relating to the Key Areas of Change, together with an updated Key Diagram, will be tabled at the meeting.
7. Attached at Appendix 2 of this report are some proposed changes to the citywide policies which were considered by the Sub-Committee at the meeting on 14th January 2020. These changes have been suggested to address comments made by Members at the January meeting and are highlighted in shaded text. Extracts have been taken from the Plan featuring the relevant changes to avoid reproducing the entire Plan.

Key Changes

8. Although extensive changes are proposed to some of the policies in Appendix 1, the vast majority of these are factual updates or relatively minor additions or amendments.
9. Officers consider that only one significant change is proposed, which is to extend the Fleet Street Key Area of Change to include Ludgate Hill and to rename it the Fleet Street and Ludgate Key Area of Change. This reflects consultation comments received on behalf of an emerging partnership of landowners in the area, who indicated that there is scope to recognise more strongly and enhance the importance of the Fleet Street/Ludgate Hill spine which forms part of the historic processional route between Westminster and the City. It also responds to comments from the Surveyor to the Fabric of St Paul's Cathedral and the Cathedrals Fabric Commission for England, who felt that the importance of St Paul's had been somewhat overlooked in the draft Plan and highlighted the great potential that exists to improve the quality of its immediate surroundings and the experience of approaching the Cathedral building from the south and west along the processional route.

Minor editorial changes

10. Given the size and scope of the Proposed Submission City Plan 2036, some further editing may be undertaken before it is considered by the Grand Committee. This includes further proof-reading to correct any typographical errors and reduce duplication, updating of the infographics and refinements to maps and illustrations. Members are asked to authorise the Director of the Built Environment to make these further minor editorial and non-material changes prior to consideration by the Grand Committee.
11. In addition, the Plan will be professionally designed prior to the start of public consultation and will be accompanied by a range of supporting material to explain the policies and proposals in more detail.

Evidence base

12. The Proposed Submission City Plan 2036 has been 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.
13. Further evidence is being gathered to support the Proposed Submission Plan including an Infrastructure Delivery Plan, which identifies the infrastructure required to deliver the Local Plan and examines where there may be gaps in funding, or trigger points which require a step change in levels of infrastructure. Another key piece of evidence is an assessment of the combined effects of the policies in the whole Plan on the overall viability of development in the Square Mile. This viability assessment will include an assessment of the scope for increasing the financial contribution to affordable housing and the future scope for updating the City's Community Infrastructure Levy. These documents will be available for Members to read when the Plan is considered by the Grand Committee.
14. Statements of Common Ground (SoCGs) are being prepared to document how the City Corporation is cooperating with neighbouring boroughs and other key partners under the Duty to Cooperate. At the time of writing, SoCGs have been agreed with Islington, Westminster, Lambeth and Southwark, with others to follow in the early part of 2020.

Integrated Impact Assessment

15. The Proposed Submission City Plan 2036 is being informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:
 - Sustainability Appraisal, including a Strategic Environmental Assessment;
 - Equalities Impact Assessment;
 - Health Impact Assessment.
16. The IIA is produced in-house but is being independently audited by consultants. It will be available for Members to read when the Plan is considered by the Grand Committee.

Next steps

17. Once the Sub-Committee has completed its consideration of the revised Plan, it will be presented to the Grand Committee, Policy and Resources Committee and Court of Common Council for approval. The current target dates for Committee approval are:
 - Planning & Transportation Committee on 10/03/2020

- Policy & Resources Committee on 19/03/2020
 - Court of Common Council on 23/04/2020
18. If the above timescales are met the Proposed Submission City Plan 2036 will be published in May 2020 for a further final six-week public consultation, which is primarily an opportunity for those with any outstanding concerns to make formal objections to the Plan. The Plan will then be submitted to the Secretary of State for Housing, Communities and Local Government, along with its supporting evidence base and the representations received. The Secretary of State will appoint an Inspector to examine the soundness of the Plan. The Inspector will hold hearings and will subsequently issue a report to the City Corporation, which may include recommended modifications. Assuming the Inspector finds the Plan sound, it is expected to be adopted formally in 2021.

Corporate & Strategic Implications

19. 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 key corporate capital projects, along with proposals to ensure a sufficient supply of business space to meet future needs. The emerging Plan aligns with the adopted Transport Strategy.

Appendices

- Appendix 1 – Track changes version of the Proposed Submission City Plan 2036: section 4.2 (Safe and Secure City), section 7 (Key Areas of Change, and section 8 (Implementation)
- Appendix 2 – Extracts from the Proposed Submission City Plan 2036 showing changes made to address comments at the Sub-Committee meeting on 14th January 2020

Background Papers

None

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