

## Appendix 2: Local Plan – Proposed changes following Sub-Committee Meeting 14 January 2020

1. At the meeting of the Sub-Committee on 14 January 2020, Members requested a number of changes to draft policies and supporting text. The following policies have been amended in line with Member wishes. Changes are shown as highlighted text. Supporting text (where not attached) has also been amended to ensure it is aligned with draft policy.
2. In relation to Policy VT5, Members were concerned about the proposed approach to drone facilities. In response, policy references to drones have been deleted and additional supporting text added under 'Reason for the Policy'.

### Policy D1: Sustainability Standards

1. All development must demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development.
2. Proposals for major development will be required to:
  - achieve a **minimum** BREEAM rating of “excellent” ~~or~~ and **aim for** “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, pollution and materials);
  - demonstrate that London Plan carbon emission and air quality requirements have been met on site, **retaining embodied carbon within building structures where feasible**. In exceptional circumstances where standards cannot be met on site offsetting will be required to account for the shortfall;
  - demonstrate climate resilience in building and landscape design;
  - incorporate collective infrastructure such as heating and cooling networks, smart grids and collective battery storage wherever possible, to contribute to a zero-emissions, zero-waste, climate resilient City.

### Policy D5: Terraces and Viewing Galleries

1. Roof terraces will be ~~permitted providing~~ **encouraged where**:

The ~~design of the~~ roof **terrace** is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;

There would be no immediate overlooking of residential premises, **unacceptable disturbance from noise** or **other** significantly adverse impacts on residential amenity. **Where there is a potential for a**

**significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;**

Historic or locally distinctive roof forms, features or structures **are can be** retained and enhanced;

There would be no adverse impact on protected views;

The design and layout of the terrace **maximises optimises** the potential for urban greening;

Emissions from combustion plant will not affect users of the **roof garden terrace**.

2. **Where roof terraces and viewing galleries are proposed, security risks must be addressed at the design stage and space for security checks incorporated into the development, where required**
3. The provision of free to enter, publicly accessible areas will be required as part of all tall building **or major** developments, which may include **roof gardens and terraces or** public viewing galleries **at upper levels**, where appropriate.

#### **Policy VT5: Aviation Landing Facilities**

1. Heliports will not be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

##### Reason for the policy

Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's **draft** Transport Strategy sets out principles that will apply to the potential use of drones in the City. **The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.**

## Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD) **in height**.
2. Tall buildings of world class architecture and sustainable and accessible design will be **encouraged permitted** on suitable sites, having regard to:
  - the potential effect on the City skyline, the wider London skyline and historic skyline features;
  - the character and amenity of their surroundings, including the relationship with existing tall buildings;
  - the **impact on the** significance of heritage assets and their **immediate and wider** settings;
  - the provision of a high-quality public realm at street level; and
  - the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.
3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.
4. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities **within the building and its curtilage, including** at upper levels, available at no charge.
5. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.
6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; **the protected vista and White Tower protected silhouette of the Tower of London**; and Monument views and setting; **all** as defined on the Policies Map.

### Reason for the policy

The City contains many tall buildings, which help to enhance its environment and economy and contribute to London's world city role. While tall buildings are a characteristic and iconic element of the City's skyline, they must not adversely impact on the City's unique environment or built heritage. **All of the City is sensitive to the development of tall buildings within and outside the City. and** Areas outside of the City may also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered. **Policy**

### HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site.

Tall buildings are defined as those exceeding 75m AOD in height. **Error! Reference source not found.**<sup>18</sup> shows their current distribution **of buildings exceeding 75m AOD in height in the City**. The City Corporation is required to refer applications to the Mayor for buildings that exceed 150m above ground height across the City and 25m above ground height in the Thames Policy Area. The intention of this lower threshold is to preserve the open aspect of the river and the riverside public realm. **Tall buildings in the City may have impacts on locations within adjacent boroughs. Developers should ensure that any cross-boundary impacts are fully addressed.**

Guidance issued by the Design Council/CABE and Historic England encourages local planning authorities to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate. The **draft** London Plan indicates that areas should be identified where new tall buildings will be an appropriate form of development in principle.

All of the City of London is sensitive to development of tall buildings **and** the City Cluster represents the most appropriate area for **encouraging** tall buildings in the City. This does not mean that **every all sites** within the **Cluster is are** suitable. **All new tall building proposals will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan. Any new tall building proposals must meet the criteria set out in the policy, to enhance the City's skyline, while minimising the impact on the surrounding area.** Policy S20 **S21** provides more details about the considerations that apply **specifically** to new tall building proposals in that area **the City Cluster**.

Outside of the City Cluster, there is **limited less** scope for new tall buildings due principally to conservation area and views protection considerations. **Error! Reference source not found.**<sup>19</sup> identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies. **Tall building development in those parts of the City outside of the inappropriate areas will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan.**

#### How the policy works

Tall buildings are high-profile developments **with a wider impact**, visible on the skyline across large parts of London. They **represent the City's built environment to a wide audience provide City landmarks** and should be designed to enhance the City's skyline.

Tall buildings **proposals** must not adversely impact on the operation of London's airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority's (CAA's) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA, **Heathrow and London City Airports** regarding building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.

The development of tall buildings must take account of City Corporation Planning Advice Notes on the potential microclimate **and thermal comfort** impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar convergence, sunlight, **and** wind **and thermal comfort** explaining how

they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.

Proposals for new tall buildings should take account of the cumulative impact of **other** the proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.

Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. **They Tall buildings** should contain permeable ground floors which provide an active frontage, such as retail facilities. **Tall buildings should provide free to enter, publicly accessible areas, which may include** ~~At upper levels, accessible public space which is available at no charge should be provided.~~ **This may comprise features such as** retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries. **There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London.**

**The City Corporation will use 3D digital modelling technology to visually assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyline. This assessment will support detailed consideration of development proposals against the policies in this Plan. Developers should submit virtual models of their development in an open source or other format compatible with the City Corporation's 3D digital model to enable this assessment.**

## **Policy CEW1 Zero Waste City**

1. Development should be designed to promote circular economy principles throughout the life cycle of the building through:
  - Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;
  - Re use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources **and retain embodied carbon**;
  - Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials;
  - Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage;
  - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.
2. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.