

**LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE**  
**Tuesday, 20 October 2020**

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)  
Committee held via Microsoft Teams on Tuesday, 20 October 2020 at 1.45 pm

**Present**

**Members:**

Deputy Alastair Moss (Chair)  
Oliver Sells QC (Deputy Chairman)  
Randall Anderson  
Christopher Hill  
Deputy Jamie Ingham Clark  
Shravan Joshi  
Graham Packham  
William Upton QC

**Officers:**

Gemma Stokley	- Town Clerk's Department
Christopher Rumbles	- Town Clerk's Department
Sarah Phillips	- Town Clerk's Department
Shani Annand-Baron	- Media Officer
Ellen Wentworth	- Technology Support Officer
Paul Beckett	- Department of the Built Environment
Adrian Roche	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
John Harte	- Department of the Built Environment
Janet Laban	- Department of the Built Environment
Sunita Burke	- Department of the Built Environment

**Introductions**

The Town Clerk opened the meeting by introducing herself and stating that the Committee was quorate.

A roll call of Members present was undertaken.

The Town Clerk highlighted that the meeting was being recorded as well as live streamed and would be made available on the City Corporation's YouTube page for a period of time after the meeting had concluded. With this in mind, it was confirmed that participants in the meeting had all individually agreed and given their consent to being recorded and that all personal data would be processed in accordance with the Data Protection Act 2018. The Town Clerk highlighted that, for further information on this, viewers could contact the City Corporation using the details provided on the public webpages.

**1. APOLOGIES**

Apologies for absence were received from Deputy Keith Bottomley.

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

There were no declarations.

3. **MINUTES**

The Sub-Committee considered the public minutes of the last meeting held on 10 February 2020 and approved them as a correct record.

4. **CITY PLAN 2036: REVISIONS TO PRE-SUBMISSION DRAFT PLAN**

The Sub-Committee considered a report of the Director of the Built Environment setting out revisions to the City Plan 2036 that were now required prior to consultation to address revisions to permitted development rights and the Use Classes Order which came into effect on 31 August 2020 and 1 September 2020; to acknowledge the short-term impacts of the Covid-19 pandemic, whilst emphasising that the medium to longer term fundamentals underpinning the City's economic success remain in place; to update the Plan to reflect the City's climate ambitions in the newly adopted Climate Action Strategy and to make minor factual updates.

Officers explained that the original intention had been for the February 2020 meeting of this Sub-Committee to oversee final adjustments to the Plan prior to its submission to the Planning and Transportation Committee and the Court of Common Council and then its publication for consultation during Summer 2020. Whilst the proposed submission Plan had been approved by the Planning and Transportation Committee and the Court of Common Council in May 2020, things were not able to progress beyond this stage as the Government had not yet changed the planning regulations to reflect the impact of COVID-19 and physical consultation on the Plan was also not possible during the height of the pandemic. As a result, this process had been delayed until Autumn 2020, at which point, the Government did announce changes to the rules such that the Plan could now go forward for consultation virtually. It was now envisaged that any further changes to the Plan agreed by this Sub Committee the Planning Committee and the Policy Committee in the coming months would go before the Court for consideration once more in January 2021 prior to consultation and, eventually, submission in Spring 2021.

A Member spoke to question whether the timing proposed would be quick enough or whether it was possible that the new legislation to implement planning reforms would be brought in before the City had concluded this process meaning that all of the work undertaken would not be worthwhile. Officers responded to state that they felt that this was unlikely as the significant changes proposed would require primary legislation. In the meantime, Officers understood that there would be transitional arrangements in place to enable those Plans that were already in train and sufficiently far advanced to continue to progress and be finalised. It was felt that the City's Plan would be able to benefit from such arrangements if Members felt that this was appropriate. Finally, Officers reported that the new MHCLG Chief Planner had very recently advised local authorities to press on with their Plans and not to treat the current uncertainties surrounding the wider planning policy context or COVID as a reason not to progress plans for the medium to longer-term.

The Member came back to question whether the internal approval of the Plan might be fast tracked by using urgency provisions meaning that it could be considered by the Court of Common Council in December 2020 as opposed to January 2021. Officers undertook to look into this possibility.

With regard to the primary legislation around the new planning regime, a Member questioned whether Officers had any insight as to when it was likely to come forward and also as to whether this would require the City Corporation to produce a Design Code. Officers reported that primary legislation was likely to come forward in 2021. They reminded Members that a Planning White Paper had already been published for consultation and that this contained various proposals which involved different mechanisms for preparing Plans and what these should contain. If this should be approved, it would clearly also have an effect in the longer term. Officers went on to comment that there was mention of things such as Design Codes within the White Paper and, should these become a requirement going forward, this would need to be discussed by Members at the appropriate time. It should not, however, be a distraction in terms of the content of the existing Plan which was intended to look forward, in a positive way, over the next 15 years, at the re-emergence of the City as a major commercial centre after the current pandemic had passed.

Members were informed that all of the proposed changes were set out within Appendix 1 to the report alongside a justification for each. When the Plan had last been considered, in early 2020, Officers had been of the view that it was sufficiently flexible and robust to accommodate reasonable unexpected occurrences and they now felt that the COVID-19 pandemic had demonstrated how sound this thinking was. It was felt that the Plan was still, fundamentally, sound and pointed the City in the right direction and would bring with it beneficial change over the next 15 years. For this reason, the Sub-Committee were asked to review the proposed Schedule of Changes only and not the entirety of the Plan once more.

Officers went on to address each of the four key drivers that were behind the newly proposed revisions to the Plan. The first of these were changes to planning law which had already happened with the most directly relevant of these to this organisation being changes to the Use Classes Order which came into effect on 1 September 2020 and changed the categorisation of some of the land uses in the City and influenced what it was possible to do with certain sites without needing specific planning permission. The Government's rationale for this was to 'free-up' control over land uses within town centres to generate greater flexibility and help stimulate the economy, future growth and the vitality of town centres going forward. With this in mind, a new Use Class – 'Class E' – had been created which incorporates offices, retail and some other uses. A consequence of this was that the Plan would need to be adapted to reflect this. In this respect, there were sections of the schedule of changes which related to office uses and how this ought to be treated going forward and other sections relating to retail uses and how this ought to be handled. As this was quite a significant change, it had led to a number of proposed revisions as set out within Appendix 1.

The second driver of change was the ongoing COVID pandemic. Officers stressed that it was, nevertheless, vital for the City Corporation to continue to look forwards over the next 15 years when deliberating the content of the Plan.

A Member agreed that it was important to try not to predict what the City might look like in the shorter term as it emerged from the pandemic. Having said that, he stated that he felt that there were two quite clear impacts of the current situation – its impact on the City’s finances and also on TfL’s finances – both of which would have a short-term or perhaps even a reasonably medium-term impact on the pace of implementation of this Plan and should therefore be factored in. He reiterated that the longer-term picture was unpredictable and that it was important to be sufficiently flexible and revisit the Plan or specific elements of it on a regular basis. Officers responded by reassuring Members that the Plans were deliberately drafted to be flexible and adaptable and the Government’s latest planning reform agenda was intended to make it quicker and easier to adapt Plans in the future. It was accepted that the document would not be perfect but it was hoped that if enough of it was as good as it possibly could be, it would give a strong steer to those who wished to be involved in the City and give them confidence to invest in it with parts of the Plan capable of being revised as and when necessary and when new changes and challenges presented themselves.

Another Member made reference to a headline in the Financial Times this morning which had made reference to the City Corporation’s 5-year plan for recovery from the COVID-19 pandemic which was to be published tomorrow. This would suggest that the effects would be felt for much longer than was being suggested here and the Member expressed concerns that the Sub-Committee were considering a Plan where there was no evidence to suggest that the next 5 years were going to be as originally thought in 2019. He highlighted that retail figures were based on a study from 2017 and that he did not feel that the wording of the Plan or this accompanying report made adequate reference to the uncertainties and the evidence that would be needed to justify what the City Corporation wanted to achieve. The Member stated that he would welcome a wider discussion around this at a future meeting of this Sub-Committee and ahead of the submission of a revised Plan to the Court of Common Council in either December 2020 or January 2021.

Officers responded by confirming that they had been involved in the report referred to which had been produced by Wyman and Arup in partnership with the City Corporation and that they had had the opportunity to read and comment upon a draft of this. They felt that many of the things within the report were complementary to the broad thrust of the approach set out within the City Plan. This type of positive engagement with consultants had enabled a better understanding of how COVID was impacting the City at present and how it might continue to do so in the short, medium and longer-term. Officers stated that they thought that the report was a good news story and set out how the City could and should be a positive commercial hub going forward which was entirely in keeping with the Plan.

Another Member spoke to highlight that a lot had been made of the '15-minute City' concept, particularly in Europe. He commented, however, that he did not feel that this was suitable for the Square Mile given its mix of business and residential and suggested that it might be helpful to address the matter at this stage in the Plan to highlight that the concept had at least been considered. Secondly, he agreed with the fact that the report on the City's 5-year plan for recovery did match much of what was included within the Plan and addressed some of the potential risks which may or may not arise. He therefore felt that a similar approach should be taken with this document whereby a vision was clearly set out and risk profiles were built up in more detail so that it could be more closely aligned with what was happening on the ground.

With regard to the concept of the 15 minute City, Officers commented that this was essentially about seeking to make the most of residents living in a particular area, or those living nearby, by encouraging them to engage in that area and thereby contribute to its economic viability. The City's circumstances were slightly different in that it did not have the same level of adjacent residential populations as other areas and where it was more dependent on longer distance commuters. Officers noted that this was not necessarily a bad thing as it meant that the City had access to a very wide regional labour pool and skilled workers/expertise that you would not necessarily enjoy with a 15-minute City model.

It was agreed that it may well be worth providing an explanation of this somewhere within the Plan. With regard to the Plan itself, Officers underlined that they were of the view that there was an obligation on them as planners and also on elected Members to lead and to set out a marker as to what they would like to happen and how they would like that to happen rather than waiting on events. Planning was essentially about positive thinking for the future and not about reactive responses to past or current circumstances. It was acknowledged that, to some extent, setting things out within the Plan as well as within this newly published report involved an element of risk but it was, nevertheless, important to set out these aspirations so that anyone wanting to engage with the City were clear on its standpoint. A Member responded by stating that, if there was evidence to support the fact that the Plan was sound, he was very keen to ensure that this was widely shared and linked into the document itself. He suggested that the wording of the schedule should be revisited now that this report had been publicised to embrace the evidence that was now available as it was clear that reliance on pre-COVID evidence alone was no longer sufficient. Officers assured the Sub-Committee that further work would be undertaken between now and Christmas 2020 to 'sense check' some of the work produced pre-COVID – this would include further work and supplementary reports around areas such as retail where it was clear that behaviours had changed as a consequence of the pandemic and where Officers would want to get a sense of whether their thinking around this pre-COVID remained relevant in current circumstances and going forward. At examination, the Inspector would also expect this to be the case and to see a good evidence base.

The Chair commented at this point to underline that he also felt that it was very important to be forward looking in terms of the Plan and planning in general,

working within the market place and providing an evidence base and justification for any aims but also to be saying, through various channels, where, as the local authority for the Square Mile, we see the future of the City.

Officers went on to report that another important driver for change was the City's Climate Action Strategy which had been factored into the Plan in Spring and had now been launched. It was felt that the Strategy was embedded within the Plan and with the publication of more specific aims within the Strategy, it was suggested that the Plan should be factually updated to reflect these. The continued progression of the Plan would also help to bed this into planning policy and generate delivery mechanisms for some of the objectives set out within the Climate Action Strategy.

The final driver for change was reported to be the Planning Inspectorate. Officers reported that in the Summer they had taken advantage of the hiatus in the Plan process to invite a Planning Inspector to view the Plan and provide feedback. As a consequence of this, further revisions to the Plan were now proposed. One example of this was in relation to housing where the Plan process typically assumes that you deliver all of your housing within your local authority area – for the City Corporation, however, this was not necessarily the case as a lot of its housing was provided in other parts of London, beyond the Square Mile. The Planning Inspector felt that where there were difficulties with providing housing in the City itself Officers ought to make a compensatory case stating that this was also provided outside of the City and that this narrative should be elaborated within the Plan to help the reader to understand the wider context.

With regard to the wider planning reform agenda and the issue of speed versus risk, Officers reported that they were of the view that the proposed reform was an attempt by central Government to drive improved performance in local planning authorities, to speed up the process and thereby deliver development in the right places at the right time to a greater extent. Considering the City Plan in this context, Officers felt that if this continued to be taken forward at a reasonable pace they would be in a good position to submit the document in early 2021, embed the various policies and begin to deliver them. Again, there was a degree of risk associated with this approach as it required making certain judgements whilst the picture in relation to COVID remained less than clear. However, it was felt that the benefits of proceeding outweighed the disbenefits. The alternative would be to cease work on the plan for the next 12 months and await further direction from Government. This would mean that the authority's local freedom of action might be drastically reduced and would also suggest to those outside the authority that it had no clear vision in terms of where it wanted to be in the longer-term.

A Member spoke to state that he agreed with the notion that the Plan should continue to be progressed in the coming months. He went on to speak about housing and stated that whilst he was not opposed to adding to the narrative on this in the way that the Planning Inspector had suggested to make reference to the City Corporation's broader work it should not be expected that this gave the authority any sort of 'pass' on the need to provide more housing in the City. He

added that one of the frustrations of central Government was that local authorities were not making sufficient progress on the delivery of housing. Whilst some authorities could point to the fact that they had granted a lot of permissions that were not built, others had made it difficult to gain permission to build housing and he felt that the City fell into the latter category. Fundamentally, he felt that the City Corporation were going to have to have a clear plan as to how housing was to be delivered within the City and not elsewhere, particularly as the Plan would be examined to a background of the Government trying to introduce legislation to increase the building of housing and the fact that the organisation had failed to meet expected targets on this for two consecutive years and were therefore starting on the backfoot. Officers commented that they were certainly not seeking to water down the commitment to delivering housing within the City in the Plan but just to incorporate the suggestion of the Planning Inspector and provide some wider context. Officers added that, perversely, the latest suggested Government methodology would actually give the City Corporation a slightly lower target in terms of housing than it currently had although it was not suggested that this should be adopted.

In terms of pace, a Member commented that he felt that Officers were being given strong support here to press on with the Plan. With regard to housing and perhaps being more explicit in terms of how targets were to be accomplished, he highlighted that, unless the City Corporation were proposing to build these themselves, they would have to rely on developers. What the organisation could do is to help ease the planning process and grant more permissions but, if developers did not then deliver on these, targets would fail to be met. Officers commented that this situation was not unique to the City but added that the Square Mile was an extreme example because of the volatility of the property market in the City. The Plan clearly set out where the City Corporation felt that housing should be within the City and Officers highlighted that the approach to this had been made more flexible compared with the adopted Plan and thereby provides a strong steer to the market on this. The Housing trajectory for the City suggested that targets would be met provided that developers deliver on identified sites in the medium-term. For the longer-term, things were less certain, and it may therefore be that, in subsequent reviews of the plan, Members and Officers look again at if they need to designate further sites within the City for this purpose or something similar. This had not proved to be necessary just yet. The Chair added that different types of delivery had also been considered.

Another Member spoke to refer specifically to Part 6.3.2 of the schedule attached at Appendix 1 regarding Active Travel and Healthy Streets and stressed that he felt that the City had already achieved this in that it had had a motivation to support pedestrianisation for a long time now, pre-COVID and that over 90% of journeys in the City were already made on foot. He was therefore concerned that this appeared to be the inclusion of words from the Mayor of London in the Plan and that this was heavily politicised as was the situation with TfL. He added that the risk of travel into the Square Mile using public transport ought to be reflected on as opposed to travel within the confines of it. It was essential that public transport was able to deliver people in and out of the Square Mile for the City Corporation to then manage pedestrianisation and

active travel within its boundaries. Officers agreed with the point made and the fact that a successful City was not possible without successful infrastructure with public transport being a critical element of this. Officers added that there were unchanged references elsewhere in the Plan to how crucial public transport was in terms of facilitating access to the City and its importance in terms of the City's competitiveness but undertook to look again at how these particular references might also reflect this. The Chair agreed that this would be helpful particularly given that things such as City Airport and the Waterloo and City Line were hot topics at present.

Another Member wished to return to the topic of housing delivery and stated that one of the options considered in March 2020 had been to identify smaller sites outside of the main designated residential areas in the City and present these as options to developers for residential development. He recalled that he had been in the minority in supporting this option but felt that, eventually, it might need to be revisited given that the nature of the City was going to change and a City that was mixed-use was likely to be the end result. Officers reiterated that there were parts of the City that had already been identified as being suitable for residential development without any adverse effects on the commercial City. If smaller sites were then to be identified outside of these areas, it was the view of Officers that this would create added complications that were not currently needed as housing could still be delivered in those areas identified for this purpose. Clearly this approach could be revisited in due course and viewed against performance. It was reported that the Inspector who had reviewed the Plan during the Summer had been generally supportive of the current approach on housing and the justification for this and designated residential areas. The Plan was sufficiently flexible to re-visit this and proposed housing numbers should this prove necessary in future years.

A Member questioned the primacy of housing policy and where this sat in terms of governance given that there were already various statements from the Policy and Resources Committee around the provision of things such as Social Housing. Officers reported that as a local planning authority the City Corporation and its Planning and Transportation Committee were responsible for the mix of land uses within the City and should therefore determine if they felt that housing should be provided in particular parts of the City. Separate to this, although very much inter-related, the Community and Children's Services Committee/Department were responsible for managing stock and may take a different view as to what stock they wished to manage and where they might want to see this provided.

Another Member spoke again to state that he was proposing that wording which made it explicitly clear to the development community and others that housing in or immediately adjacent to a residential area was not unfavourable should be included within the Plan. Officers stated that they would be happy to revisit this to ensure that the wording around this was as clear as possible and that the presumption was in favour of housing delivery in or near identified residential areas. Officers underlined that Policy S3 – Housing – encourages new housing development on appropriate sites in or near identified residential areas. The Member recognised this but suggested that there was still language



within the Plan around office use which would appear to be at odds with this. The Chair interjected to state that policies around the protection of office space in the City would trump the expansion of residential areas. The Member stated that he felt that a more relaxed approach should be taken with regards to development within or immediately adjacent to existing residential areas. Officers stated that they did not feel it was necessary to go so far at present given that there was evidence to suggest that housing delivery already within the pipeline would achieve the necessary targets within the medium-term. Should there be issues in terms of housing delivery in the longer-term, then this may well be an appropriate revision to consider in due course. Officers undertook to revisit the Office Protection Policy to ensure that they were satisfied that it was as clear as possible at this stage.

Another Member suggested that wording around housing delivery needed to be carefully considered as, even some sites adjacent to existing residential developments could have unintended negative consequences if they were to be used for housing. Housing next to licensed premises was a clear issue for example.

A Member commented that whilst there would appear to be broad support on the proposed changes set out within the schedule at Appendix 1, he still felt that there was not enough information on the likely effects of the pandemic on short-term plans over the next 5 years and that more evidence around this should be provided before the Plan was recommended for approval by the Planning Committee, the Policy Committee and the wider Court. Officers reported that this Plan was focused primarily on a post-vaccine era, assuming that there would be a vaccine within the short-term. Whilst it was still expected that this era would differ from the pre-COVID era in terms of behavioural trends, some trends would likely persist just for the duration of the pandemic, some trends that were in decline prior to the pandemic could disappear entirely as a consequence of COVID and other new trends would emerge that would persist longer-term and which would need to be recognised within the document – for example remote working. It was expected that the attraction of central cities would re-emerge in a post-vaccine era given that they offered economies of scale and scope, together with vitality and innovation. There would also, however, undoubtedly be more remote working going forward which would impact upon the number of workers in the City on any particular day but not to the extent that this would dramatically reduce numbers employed in the City overall. With this in mind, it was not believed that the effects of COVID would fundamentally alter the assumptions that underpinned the existing Plan. Officers underlined once more that they were of the view that it was important to move forward with the situation as they currently understood it and to provide leadership in terms of planning. The Member responded to argue that there was currently no evidence to support the statement that had just been made and that the Planning Inspector would be looking for this. The Member added that he would be keen to test the theory presented by Officers over the next 2-3 months before the Plan was finalised. The Chair reported that Officers had made it clear to him and the Deputy Chairman that in terms of national guidance, the context of the Plan would, to a degree, be set for us. He added that the current situation was unique in terms of assessing the soundness of

the Plan and that the test for him was therefore around whether there was evidence to suggest that the aims and aspirations within the Plan were either unrealistic or undeliverable and if there was not then these aims and aspirations should be promoted and pursued. If there was evidence to the contrary, the aims should be revised. In terms of evidence on the current situation, the Chair underlined that the organisation had collected a lot of data around the effects that this was having in the form of the soon to be published Wyman and Arup report amongst other things.

Officers reported that once the Plan was approved by the relevant Committees and the Court in early 2021, it would then be the subject of public consultation ahead of submission in Spring 2021. Should the picture around COVID and its consequences become clearer during this time, the City Corporation could make it clear upon submission that this reflects the view taken six months previously and, whilst it was still felt that the Plan was generally sound, certain policies would now require finessing to demonstrate some flexibility.

Officers went on to highlight that the Plan contained an Office Floor Space target of 2 million square metres growth. They reassured Members that approximately two thirds of this had either already been delivered or was currently under construction.

Another Member commented that, by the time this Plan was submitted in 2021, major occupiers would already have begun to take decisions about how they occupy their space which would, in turn, provide further evidence either in support of or contrary to the aims set out within the document. Anything prior to this would have to be purely speculative. The Member went on to refer specifically to the proposed revisions concerning paragraph 3.4.6 and the Key Areas of Change: Smithfield and Barbican. Here he questioned the proposed removal of the word 'potentially' suggesting that there were likely to be those who would strongly oppose this with regard to the markets consolidation project. Officers reported that this was proposed to reflect the fact that, since the draft Plan had been produced, public consultation had taken place around the consolidation of the wholesale markets and principles around the re-use of Smithfield Market. The Museum of London application had also been approved by the Planning Committee, providing more certainty. The Chair suggested that the wording here might be amended to refer to the re-use of the whole or part of Smithfield Market. Officers undertook to amend this as proposed.

With regard to the wider housing context, the Member referred to the wording of paragraph 4.3.12 on Housing and the aim of delivering at least 700 new homes on City-owned land and housing estates in 2019-23 which he felt was unachievable particularly given that, once work had completed on the two sites that were currently progressing, there had been no budget identified for further works. Officers undertook to revise the wording in this context so that it more accurately reflected the numbers that were likely to be delivered in the short-term.

Another Member wished to focus on retail and Strategic Policy S5 which referenced the principal shopping centres in the City. He went on to state that

he had specific concerns around Fleet Street and the viability of this and questioned whether something such as a Local Area Plan might be useful to promote this area. He added that he felt that the success of retail areas was dependent on the mix of retail on offer and questioned the planning authority's ability to influence this, if any. The Member reported that, pre-pandemic, a well-known hardware store on Fleet Street had closed with plans for another sandwich bar to replace this – something that had been met with great disappointment by local residents. Officers responded by reporting that the Use Classes Order changes introduced in September 2020 effectively took away some of the local authority's powers over change of use between different retail uses (A1/A2 and A3 for example). However, even prior to this, there had been no means by which to control which particular shop would operate from a particular retail unit and promote an ironmonger over a sandwich bar for example. On a positive note, Officers reported that earlier this morning they had held a liaison meeting with the Fleet Street Quarter Partnership as part of ongoing engagement with them and that the Partnership was looking to develop from a partnership to a bid status for the area. One of the themes brought forward had been that if all interested landowners in the area could properly engage in the process and agree that it was in the interests of them all for Fleet Street to be a vibrant 'spine' for the whole area, then it might be possible to curate the sort of retail and other uses along Fleet Street that were desired, even in the absence of the previous local authority levers around this. Officers had undertaken to revisit the Fleet Street Key Area of Change wording within the Plan to reflect that partnership, the bid and the aspirations to link the area into other parts of the City. The Chair highlighted that the Deputy Chairman was leading on this work from a planning policy perspective given that his own office was on Fleet Street, with his firm also part of the partnership mentioned, and that he may therefore be potentially conflicted.

The Member also highlighted reference within the Plan to temporary retail pop-ups and underlined that these could sometimes adversely affect local retailers occupying fixed units particularly if were in direct competition with them and had lower overheads. He added that these therefore needed to be managed carefully. Officers accepted the point but highlighted that the thinking behind these references had been an attempt to animate otherwise sterile areas and not to provide direct competition to existing retailers.

Officers thanked the Sub-Committee for a useful steer on the various issues presented and undertook to present some amended proposed revisions to their next meeting on 4 November 2020 alongside further reassurances on and evidence to support the approach being taken during the ongoing pandemic.

**5. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

**6. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

There were no additional, urgent items of business for consideration.

**The meeting ended at 3.06 pm**

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Chairman

**Contact Officer: Gemma Stokley**  
**tel. no.: 020 7332 3414**  
**[gemma.stokley@cityoflondon.gov.uk](mailto:gemma.stokley@cityoflondon.gov.uk)**