

## **Appendix A: Summary of key issues raised during consultation on the Proposed Submission Draft City Plan**

A total of 1,327 representations were received from 171 respondents. This appendix provides an outline of the main issues raised, grouped by theme and in the same order as the draft Plan itself.

### Vision, Strategic Objectives and Spatial Strategy

There were 110 representations on this section of the Plan, and the key points raised are outlined below:

- The Mayor of London felt that the vision and approach aligned well with the London Plan's Good Growth objectives, noting a greater focus on the health and wellbeing of the City's communities and how this relates to the design of new buildings, open spaces and the wider public realm. The Mayor welcomed the identification of 7 key areas of change supported by an overarching spatial strategy which promotes reductions in greenhouse gases and improvements in air quality. He considered the overall spatial strategy and growth projections to be consistent with the London Plan, notwithstanding his concerns about a divergence from the London Plan in relation to tall buildings.
- The CPA supported the strategic aims although it considered the figures in Table 2 of the spatial strategy to be overly prescriptive and advocated recognising market trends and building in greater flexibility. In particular, the CPA questioned the evidence base to support "significant retail development" in the four Principal Shopping Centres.
- London Sephardi Trust and the Spanish and Portuguese Sephardi Community considered the spatial strategy to be unbalanced and highlighted point 6, which seeks to focus new tall buildings in the existing cluster while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site. They noted there is no reference in this part of the spatial strategy to the preservation of views of other important heritage assets or to the preservation of important views out from and/or the setting of important heritage assets within the cluster. In their opinion, the primarily economic objective served by the construction of tall buildings in the cluster is thereby allowed to dominate (around 80 largely identical representations were received supporting this point).
- The Barbican Association noted that the spatial strategy aspirations do not include protecting residential amenity. It felt the omission of any mention of residential amenity in this key strategy makes all the other mentions of it in the Plan of little value.
- The Golden Lane Estate Residents' Association considered the target to transition to a zero carbon and zero emissions City by 2040 to be unambitious and the housing target to be extremely unambitious.
- The Surveyor to the Fabric of St Paul's Cathedral expressed concerns about point 9 of the spatial strategy, suggesting that balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces is ambiguous and may allow harm to public heritage assets.
- LB of Tower Hamlets indicated it was broadly supportive of the City Plan's vision and objectives and recognised the need to work across borough boundaries to address key spatial matters.

- Other respondents from the business community, amenity groups and arts organisations expressed general support for the draft Plan's vision and objectives, for instance welcoming the commitments to ensuring further urban greening and improvement of air quality, the aspiration to deliver sustainable growth following the pandemic and the ambitions to strengthen active travel and support culture in the City.

### Healthy and Inclusive City (Strategic Policy S1 and Policies HL1-9)

There were 51 representations on the policies in this section of the Plan, which raised the following main points:

- Healthwatch City of London made several comments. They noted that the Plan recognises the main contributors to poor health but observed that it is difficult to see how the City will manage its commitment to improving health. For instance, there is no mention of the infrastructure for health and wellbeing including GP services, diagnostic centre, social care services, and mental health provision. They also commented that while this section provides the right sentiment, there should be a greater emphasis on 'must' rather than 'should'. The City should be at the forefront of managing urban problems such as noise and light pollution.
- The Golden Lane Estate Residents Association questioned why private healthcare facilities are exempt from the requirements of Policy S1 given the limited facilities in the City.
- Healthwatch City of London called for more attention on physical accessibility across the City, while another respondent felt the Plan's focus was on developers' responsibilities, but more should be done to improve pavements, pedestrian crossings etc.
- The CPA suggested that Air Quality Impact Assessments (AQIAs) should only be required where there is 1,000sqm or more floorspace created. The policy as drafted would capture change of use applications. However, another respondent called for the City Corporation to take a more robust approach to AQIAs and employ consultants at the developers' expense to rigorously review the methodology and monitor outcomes.
- The Barbican Association requested the air quality policy include the establishment of zero emission zones around residential areas.
- A few respondents felt more emphasis needs to be placed on light spillage. The Barbican Association suggested a requirement for lighting impact assessments in the same circumstances as noise impact assessments.
- The CPA commented that a loss of social infrastructure and community uses may be acceptable where it is part of a published strategy or where the loss leads to funding for enhanced facilities elsewhere. They also suggested a more strategic approach should be taken to community facilities through supplementary planning guidance.
- The Golden Lane Estate Residents Association argued that as there are few social and community facilities in the City at present their loss should be strongly resisted.
- Sport England commented that there does not appear to be a robust and up-to-date evidence base in relation to indoor and outdoor sports facilities. They

had concerns with the wording of Policies HL5 and HL7, for instance that the criteria for assessing the loss of existing sports and community facilities does not consider future needs/demands or other sports clubs that may wish to have access to a facility but currently do not.

- A group of City residents/City commuters commented that the Plan does not address the requirements of space within the public realm to make it suitable for exercise nor does it mention dual use of public space.

### Safe and Secure City (Strategic Policy S2 and Policies SA1-3)

There were 13 representations on this section of the Plan, which raised the following main points:

- The Surveyor to the Fabric of St Paul's Cathedral stated that Policy S2 should not only focus on new development, noting there is a need to implement enhanced security measures around St Paul's.
- The CPA commented that the requirement under Policy SA1 (Crowded Places) for all major developments to conduct a full risk assessment is not justified and should be more flexible.
- The CPA suggested the requirement under Policy SA2 (Dispersal Routes) for all major developments to submit a Management Statement could be secured by a planning condition as in many instances details are not known at the application stage.
- TfL suggested the use of trees, planters and benches to reduce the impact of Hostile Vehicle Mitigation measures.
- The Barbican Association commented that the expectation for dispersal routes relies on management action and the City Corporation has insufficient resources to deliver this.
- The Barbican Association suggested the Plan should set out requirements for building materials that are more resistant to bomb blasts than continuous glass surfaces.

### Housing (Strategic Policy S3 and Policies HS1-9)

There were approximately 30 representations on this section of the Plan, which raised the following main points:

- The Mayor of London welcomed the Plan's commitment to meet the London Plan housing target and the small sites target and supported directing new housing to locations in or near identified residential areas.
- The Mayor generally supported the approach to affordable housing, subject to certain detailed wording issues, but commented that the proposed tenure split is not in accordance with the London Plan.
- The Barbican Association commented that the Plan has an aspiration to build 2,482 new housing units near to existing residential clusters, but no means of ensuring that happens. The Plan refers to "windfall" sites i.e. ad hoc, unplanned and providential.

- The Golden Lane Estate Residents Association commented that existing housing estates in the City are already very dense and new building in their boundaries would be inappropriate. The City needs a strategy for identifying suitable sites.
- A few respondents sought a more positive policy approach to housing, for example suggesting restrictions on change of use of offices to residential will need to be reconsidered in light of increased remote working post the pandemic. Another considered that residential development, particularly as part of mixed-use development, can support economic success and should be assessed on a case by case basis.
- The Barbican Association called for more specifics on how the cumulative impact of individual developments on residential amenity (Policy HS3) will be defined. There needs to be an explicit statement of a baseline.
- A student housing provider suggested amendments to Policy HS6, e.g. to recognise that purpose-built student accommodation can support the City's primary business function; to remove reference to student housing compromising the delivery of conventional housing; and to remove the requirement for such schemes to be supported by higher education institutions within the City of London or the CAZ.
- Middle Temple sought the removal of the policy requirement to maintain an overall balance of residential accommodation and professional chambers in The Temples. There has been an organic reduction in the number of residential units and the need for residential accommodation has diminished as a result of the pandemic. There should be flexibility to convert residential units to professional/office use as required.
- The Mayor of London supported the policy on older persons housing and suggested the City Corporation should work with providers to identify sites that may be suitable to meet the need.

#### Offices (Strategic Policy S4 and Policies OF1-3)

There were just over 20 representations on this section of the Plan, with the main points raised being:

- Support from business respondents and from the Mayor of London for the target to deliver 2 million sqm of net additional office floorspace over the Plan period.
- The CPA supported changes made to the office policies to reflect the changing office market and the need for flexibility.
- A number of respondents supported the emphasis on flexible and adaptable office space to accommodate the needs of SME's, innovative and start-up companies.
- Tower Hamlets commented that office development in the City should be phased sensibly to ensure that it does not undermine the market for, and viability of, office and mixed-use development in other parts of the CAZ.
- The Golden Lane Estate Residents Association pointed to a need to examine how the City's economy and patterns of work may change following the pandemic.

- The Mayor of London indicated the Plan should seek to ensure there is sufficient capacity for last mile distribution, freight consolidation and related functions to support the needs of business.
- A few developers felt the City Corporation should take a more flexible approach to enabling vacant unviable office stock to be brought back into an economic generating use. For instance, the 12-month marketing period for loss of office floorspace would hinder flexibility and Policy OF2 should be reworded to allow for the loss of office space to be demonstrated either through marketing or viability evidence, but not both.
- A couple of respondents highlighted a need to secure affordable workspaces and to support creative uses.
- British Land commented that affordable workspace should not be limited to below market rents and should also be assessed with regard to lease lengths, fit out and service provision, taking into account the total cost of occupancy.
- The CPA expressed support for meanwhile use of vacant commercial, business and service buildings as well as offices, which will assist the growth of cultural facilities and creative industries.
- A student housing provider argued that when determining loss of office floorspace, purpose-built student housing ought to be included as an appropriate form of residential accommodation in or near residential areas

#### Retailing (Strategic Policy S5 and Policies RE1-5)

There were only 10 representations relating to the policies in this section of the Plan, albeit issues relating to retail provision were sometimes included in more general comments or in comments relating to individual Key Areas of Change. The following main points were raised:

- The CPA expressed concern that the policies are too prescriptive. Many existing retail uses are now in Class E use and more flexibility is required. The retail industry is in transition and policies need to reflect this. In this context, the CPA commented it is unclear why a Retail Impact Assessment is required for schemes promoting over 2,500 sqm of floorspace.
- The CPA and a couple of other respondents pointed to the importance of active frontages as a policy ambition.
- An individual respondent commented that increased retail growth may be optimistic due to increased home working and less visitors.
- A business commented that opportunities for retail growth outside the Principal Shopping Centre's (PSCs) and Retail Links should be recognised and promoted.
- Another respondent expressed support for the encouragement of town centre uses and active frontages across the City as long as these do not detract from the viability of core retail areas. The Plan could encourage the development of new business models and improve the leisure and entertainment offer for visitors.
- A traders' group expressed support for the policy relating to protection of specialist retail uses but suggested minor changes for clarity.

- The Smithfield Market Tenants Association highlighted that Policy RE5: Markets neglects to mention Smithfield Market.

### Culture, Visitors, and the Night-Time Economy (Strategic Policy S6 and Policies CV1-5)

There were just under 50 representations on this section of the Plan, which raised the following main points:

- There was strong support for the City Plan's cultural aspirations from a number of arts organisations and from the CPA/other business respondents.
- The requirement for developers to submit Cultural Plans as part of planning applications for major developments attracted broad support, including from the Museum of London and the Arts Council. One respondent felt it could be transformational for the City in the long term, while another indicated that the policy should go further and consider specific quotas/metrics.
- While supportive of Cultural Plans in principle, the CPA suggested that CIL and s106 contributions are more appropriate than on-site cultural provision for some developments, while British Land highlighted the need for a proportionate cultural offer depending on the scale and nature of the development in question.
- A couple of respondents highlighted the need for future development on the Museum of London site to include cultural uses.
- There was a divergence of views on the night-time economy. The Mayor of London suggested a commitment in the draft Plan to develop a vision for the night-time economy to support its growth and diversification, while Tower Hamlets commented that the City should provide more explicit support for the expansion of night-time economy uses within appropriate areas. A few other respondents argued that businesses will be attracted to the City if it remains vibrant at night.
- However, the Barbican Association highlighted a spatial clash between the Northwest of the City being its biggest residential area, with more housing planned, and the site of the City's major cultural offer, with more 24-hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash.
- The Golden Lane Estate Residents Association also sought clarification on how the cultural and night-life ambitions are to be integrated with the needs of residents.
- The Barbican Association suggested policy wording changes including a statement that new or extended evening and night-time entertainment and related uses will not be permitted adjacent to residential clusters.
- A few respondents commented that these policies could go further on diversity and inclusion, for instance by providing welcoming spaces for more diverse communities and encouraging public art from a diverse range of artists.
- The CPA welcomed changes made to the hotels policy which provided additional flexibility and a hotel operator, while broadly supportive, felt that the requirement for complementary facilities accessible to the public should be applied flexibly on a case by case basis.

### Smart Infrastructure and Utilities (Strategic Policy S7 and Policies IN1-3)

There were only 6 representations on this section of the Plan, which raised the following main points:

- Could the Plan set out how it will strengthen wider shifts towards electric transport and heating as part of the transition to a low carbon society.
- Text should be included to indicate that if infrastructure connections are unknown at application stage, planning conditions or obligations will be used to secure such detail.
- The City Corporation should support existing offices as well as new developments to access super-fast fibre broadband, wireless, 5G etc. to avoid two track technology office spaces.
- It is unclear whether the intention is to require developers to connect the construction site to the electricity grid or require the use of emission free power sources.
- Financial penalties should be used to ensure compliance.

### Design (Strategic Policy S8 and Policies DE1-9)

There were approximately 190 representations on the policies in this section of the Plan. The reason for the relatively high response rate was that there were multiple comments suggesting identical changes to the supporting text of Policy DE1: Sustainability Standards and to the wording of Policy DE3: Public Realm. The main points are summarised below:

- The CPA expressed concern about the requirement for internal access through development sites as a matter of principle due to design and security issues which mean it is often not feasible or viable.
- There were mixed views regarding the provision of public open spaces at upper levels. Some respondents were supportive (e.g. referring to 'Parks in the Sky') but others pointed to the practical difficulties or to adverse impacts on residential amenity and biodiversity.
- The CPA and some other business respondents indicated concern about the requirement for free to enter roof terraces and spaces as part of all tall building or major developments as these should only be sought in appropriate circumstances.
- The CPA and an individual questioned if the requirement for a 'world class standard of design' is measurable?
- The Barbican Association argued that a Design Review Panel is necessary to ensure that all developments meet the highest standards of urban design.
- Historic England commented that the design policies do not address the effect of development on the setting of heritage assets or cross-boundary impacts.
- Developers must provide a robust justification for demolition and explain why they are not retrofitting or refurbishing an existing building and there should be a requirement for a Whole Life Carbon Assessment for all development over

10 dwellings or greater than 1,000 sqm in size (there were around 20 representations from individuals on this point).

- The CPA commented that emphasis should be placed on new and innovative technologies to achieve shared sustainability goals, and that carbon offsetting strategies should be developed in the City given the constrained setting.
- Policy DE3 should include additional wording to highlight the importance of avoiding overshadowing, restriction of sky view and overlooking by other buildings that would compromise the useability and function of the space (there were around 80 representations on this point, related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue).
- The Barbican Association indicated concern that developers are 'gaming' the daylight and sunlight policy requirements and that it isn't clear how cumulative impacts will be assessed.
- Friends of City Gardens highlighted that the impact of lighting schemes on biodiversity (particularly bats) needs to be taken into account.

#### Vehicular Transport and Servicing (Strategic Policy S9 and Policies VT1-5)

There were approximately 40 representations on this section of the Plan, with the main points raised being:

- TfL expressed support for changes made since consultation on the draft City Plan but noted that the 'London Access Streets' in Figure 13 do not fully reflect the Transport for London Road Network.
- A few respondents supported the policy seeking step free access at rail and underground stations and river piers, but an individual noted no evidence that the City Corporation is prioritising this.
- The CPA observed that it is unclear if transport assessments and travel plans thresholds in Policy VT1 relate to total floorspace, unit numbers or net additional floorspace.
- British Land observed that Policy VT2 does not consider multiple buildings that are in single ownership where common procurement methods or preferred supplier schemes can effectively reduce the number of delivery trips
- The CPA supported the intent of freight consolidation but noted it is not always possible to align delivery and servicing arrangements with adjoining owners.
- A business commented that the policy approach to re-timing of deliveries outside peak periods contradicts the terms agreed for a recent development near a residential area - clarification is required.
- It was commented that greater use of the Thames must respect the need to reduce emissions from riverboats to acceptable levels.
- It was suggested that paper shredding on-street be prohibited as it produces excessive noise and air pollution.
- A couple of respondents felt that the parking policy fails to recognise the needs of residents with limited mobility noting there is no provision for disabled visitors to park without risk of fines.

- Support was expressed for EV charging points.

### Active Travel and Healthy Streets (Strategic Policy S10 and Policies AT1-3)

There were approximately 20 representations on this section of the Plan, with the main points raised being:

- TfL supported the change of title to Active Travel as this encompasses a greater range of healthy, active modes of travel but expressed disappointment that there is no mention of TfL's cycle hire scheme as a way to promote cycling considering how well it is used in the City of London.
- A business commented that by reducing road space to make way for more cycle and pedestrian routes, care needs to be taken to avoid creating vehicular congestion and hindering deliveries.
- Network Rail expressed support for improvement of access routes and public realm around stations – City Thameslink and Cannon Street are examples of stations which could benefit from such improvements.
- The CPA indicated concern about the blanket requirement to provide pedestrian routes through new developments as there will be occasions where this is not appropriate.
- Tower Hamlets and another respondent indicated the City Corporation should work with neighbouring boroughs to enhance key pedestrian and cycle routes that cross borough boundaries
- It was suggested that the City Corporation should work with Network Rail and TfL to provide large-scale secure cycle parking at rail stations and other key locations.
- A student housing provider argued that the London Plan cycle parking standards for student accommodation will result in over-provision and thereby reduce the efficient use of land. Part of the requirement could be provided as pool bikes.
- A business argued that where London Plan short stay cycle parking requirements cannot be met, the City Plan's requirement for an additional 25% long stay cycle parking spaces is unlikely to be feasible in most cases and should be removed.

### Historic Environment (Strategic Policy S11 and Policies HE1-3)

There were around 200 representations on the policies in this section of the Plan, the majority of which comprised comments suggesting identical changes to Strategic Policy S11 and Policy HE1: Managing Change to Heritage Assets. The main points are summarised below:

- A number of individuals and organisations highlighted the historical, architectural, cultural and spiritual significance of Bevis Marks Synagogue to the City and to the Jewish community, calling for the City Plan to recognise this significance and to implement specific protections for it.

- While supporting Policy S11, additional wording was suggested to indicate that considerations in relation to heritage assets and their settings will be given full weight in all planning decision-making (around 80 largely identical representations were received supporting the concerns of the London Sephardi Trust and the Spanish and Portuguese Sephardi Community about the potential impact of tall buildings on Bevis Marks Synagogue).
- While supporting Policy HE1, additional wording was suggested to clarify that heritage assessments should be detailed and prepared by an appropriately qualified expert, and that proposed development which does not conserve and enhance heritage assets and their settings will be resisted (as above, around 80 largely identical representations were received on this point).
- Historic England sought reference to the overall setting of the Tower of London World Heritage Site (WHS) in Policy S11 rather than being restricted to the local setting.
- The Mayor of London supported the requirement for heritage assessments in Policy HE1 but requested inclusion of a similar requirement in Policy HE3 relating to development with the potential to affect the Tower of London WHS or its setting.
- The CPA considered that Policies S11 and HE1 do not fully reflect the NPPF in terms of harm and benefits or reflect case law that has established principles about the balance to be applied.
- Tower Hamlets stated a need to acknowledge the importance of the settings of conservation areas and that development outside of conservation areas can have an impact on their character and significance.
- The Diocese of London highlighted that the significance of the dome of St Paul's on the City's skyline is more than simply maintaining a historic vista.
- The Surveyor to the Fabric of St Paul's expressed concern about inadequate drafting of Policy HE1, for instance in terms of defining the wider setting of heritage assets, and a lack of precision in relation to harms and benefits weighting. There is no definition of or recognition of the 'iconic value' of St Paul's to the City.
- The Victorian Society were concerned by the lack of reference in the City Plan to existing and future Conservation Area Character Summary and Management Strategy SPDs
- An individual respondent argued that the City Corporation should publish a list of non-designated heritage assets and not merely rely on ad hoc identification in the planning process.
- SAVE Britain's Heritage proposed wording highlighting that heritage should be brought to more diverse audiences in a way that is socially and economically inclusive.
- Friends of City Gardens commented that account should be taken of the biodiversity value of historic assets, such as walls and tombstones.

## Tall Buildings (Strategic Policy S12)

Approximately 100 representations were received on this policy, a large majority of which related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue. The key points raised were:

- The Mayor of London considered that the policy approach in the City Plan, which defines inappropriate areas for tall buildings, leaves uncertainty regarding the status of other parts of the City. The London Plan 2021 states that tall buildings should only be developed in locations identified as suitable in development plans and requires boroughs to identify any such locations along with appropriate tall building heights. The Mayor considers that, as currently written, the draft City Plan is not in general conformity with the London Plan.
- Historic England welcomed amendments to the policy since the previous draft but highlighted that fundamental concerns regarding ambiguity remain. Adopting an approach that only maps out areas inappropriate for tall buildings infers that elsewhere they may be appropriate leading to a potential risk of harmful proposals coming forward.
- Concern was expressed that the policy gives greater weight to the need for additional tall buildings over other important planning objectives, notably conserving and enhancing heritage assets and their settings (around 80 largely identical representations were received supporting the concerns of the London Sephardi Trust and the Spanish and Portuguese Sephardi Community on this point).
- Bevis Marks Synagogue as a Grade I Listed Building warrants similar protection as that provided for St Paul's, the Tower of London and the Monument, and that this protection should be secured by an appropriate designation on the Proposals Map (as above, around 80 largely identical representations were received on this point).
- Historic Royal Palaces advocated that Figure 21 showing areas inappropriate for tall buildings should take account of LVMF views 10A.1 from Tower Bridge and 25A.2&3 from the South Bank.
- The Surveyor to the Fabric of St Paul's noted that the digital model was not included in the evidence base for the City Plan, arguing that it should be added so that decision-making is transparent with reference to an agreed model on which harms and benefits can be judged.
- Tower Hamlets advocated amending the definition of tall buildings to ensure that all buildings that are tall relative to their context, are assessed as such. It should be acknowledged that buildings below 75m could also have significant impacts on protected views.
- A business respondent suggested that the definition of a tall building in the City Cluster should be higher than other areas in the City. A tall building proposal located in a conservation area that preserves the heritage significance of nearby heritage assets and meets other relevant policy objectives should be considered acceptable.

- The CPA pointed to circumstances where it is not feasible, practical or viable to provide publicly accessible open space or other facilities at upper levels and there may be instances where other benefits, e.g. education, cultural, or affordable workspace, need to be prioritised over this provision.
- A few respondents requested that the area around the Barbican and Golden Lane / the Smithfield and Barbican Key Area of Change be confirmed as inappropriate for new tall buildings and Figure 21 amended accordingly.

### Protected Views (Strategic Policy S13)

Just over 80 representations were received on this policy, almost all of which related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue.

- The London Sephardi Trust and the Spanish and Portuguese Sephardi Community proposed additional wording to this policy to bring it into line with their suggested rewording of S12, i.e. to protect sky views from the curtilage of Bevis Marks Synagogue (around 80 largely identical representations were received supporting this point).
- Lambeth noted that Strategic Policy S13 does not acknowledge the existence of views into the City designated by other boroughs, often at the request of the City Corporation in the past and requested that this be addressed through additional wording.
- Tower Hamlets advocated the inclusion of the LVMF river prospect from Tower Bridge (View 10A.1) within Figure 22 and reference to Tower Bridge as a strategically important landmark.

### Open Spaces and Green Infrastructure (Strategic Policy S14 and Policies OS1-4)

There were just over 50 representations on this section of the Plan, with the main points raised being:

- Broad support for the policies in this section, particularly the emphasis given to the role of planning in helping to 'green the City'. Support was expressed by the Mayor of London, amenity groups, businesses and individual members of the public.
- Some respondents highlighted the importance of maintenance to the success of these policies, while reference was also made to the need for quantifiable targets and timescales and post-completion monitoring on new developments.
- Friends of City Gardens highlighted the need for greening to be more than a fig leaf and for high quality and species-specific interventions as well as more green space for the public. They also questioned whether there are sufficient resources to monitor and evaluate biodiversity benefits and make sure they are substantive, effective and resilient.
- The CPA requested more flexibility in Policy OS1 relating to open spaces, arguing that it is not justified to secure access to existing private spaces, nor is it appropriate to seek to secure access to all private spaces within new developments.

- The introduction of an Urban Greening Factor (UGF) was broadly welcomed, including by the CPA and other business respondents, although the CPA felt there needs to be flexibility to take account of particular circumstances of sites, particularly where roof space is constrained or can better serve other priorities in the Plan.
- A couple of respondents advocated that the maximum attainable UGF for each development should be the goal rather than a generic threshold.
- Changes made to Policy OS3 on biodiversity since the previous draft were supported, particularly the reference to Biodiversity Net Gain (BNG), although more details were sought on how BNG will be implemented.
- Suggestions included production of Habitat Action Plans for target species of biodiversity importance in the City, and greater protection of biodiversity within Site of Importance for Nature Conservation (SINCs) through the production of management plans incorporated into SPDs.
- The new policy on Trees (OS4) was welcomed. The Woodland Trust suggested some refinements, including adoption of a target to increase the number of trees and their overall canopy cover by at least 10%.

#### Climate Resilience and Flood Risk (Strategic Policy S15 and Policies CR1-4)

There were 17 representations on this section of the Plan, with the main points raised being:

- The Environment Agency were supportive of revisions made to policies CR2 and CR4 (relating to flood risk and flood protection and flood defences) since the previous draft Plan.
- Thames Water were supportive of Policy CR3: Sustainable Drainage Systems (SuDS) including the requirement for developers to liaise with them early in the design process.
- While recognising the merits of SuDS measures, the CPA suggested an amendment to take a proportional response by focusing on major developments, arguing that a change of use application for example cannot reasonably implement SUDS measures.
- Friends of City Gardens strongly supported the SuDS policy.
- A couple of respondents noted the concept of blue roofs is mentioned in this section and suggested the benefits of blue roofs could be promoted more extensively in the City Plan.

#### Circular Economy and Waste (Strategic Policy S16 and Policies CE1-3)

There were 16 representations on this section of the Plan, with the main points raised being:

- The Mayor of London supported the general policy approach and the requirement for circular economy statements to be submitted for all major and EIA development proposals.
- The Mayor suggested an amendment to clarify that construction and demolition waste contribute towards the net self-sufficiency target for London, and encouraged the City Corporation to seek further opportunities within

London for the management of its waste through collaborative working with other boroughs.

- TfL commented that there is limited detail on the transport of waste, including the types of waste and quantities transported by river barges and whether this is likely to change in the future.
- A respondent sought further clarity on expectations for the re-use of materials, building refurbishment and the application of Circular Economy principles.
- Other comments included reference to the need to reduce the amount of food waste and encouragement for use of both rail and water to transport waste.

### Key Areas of Change (KAoCs): General Comments

A small number of general comments about the KAoCs were received:

- TfL were supportive of further guidance for particular KAoCs, adding this would be an ideal opportunity to promote sensitive approaches to walking, cycling, highway safety and public realm.
- Tower Hamlets supported the principles of the KAoCs but suggested that the City Corporation should reconsider the inclusion of site allocations to ensure that development on strategic sites comes forward in a manner that is sustainable and includes the necessary supporting infrastructure.
- The Victorian Society requested reference to the Conservation Area Character Summary and Management Strategy SPDs, which would go some way to ensuring that the predicted change in these key areas be informed at a strategic level by a shared understanding of the historic environment.

### Thames Policy Area (Strategic Policy S17)

There were 8 representations on this policy, which raised few significant issues:

- There was support for the proposed policy approach, including from the Port of London Authority (PLA) and from the Mayor who welcomed the continued safeguarding of Walbrook Wharf.
- In relation to the policy requirement for publicly accessible roof terraces, the CPA commented that in addition to the potential exceptions cited there may be site specific instances where this is not practical or viable.
- A recommendation was made to refer to the GLA/PLA Case for a River Thames Cultural Vision, which was launched in 2019.

### Blackfriars (Strategic Policy S18)

Only one representation was received, which made suggestions to improve the quality of accompanying Figure 30 (similar suggestions were made in relation to illustrations used throughout the Plan).

### Pool of London (Strategic Policy S19)

There were 5 representations on this policy, which raised the following main points:

- Representations on behalf of a business with a long leaseholding in the area expressed general support for the proposed policy direction but advocated

some changes to the policy wording including reference to preservation 'or' (rather than 'and') enhancement of heritage assets; omission of specific reference to 'river' frontages; and the qualification 'where appropriate' in relation to seeking additional public space and play facilities.

- SAVE Britain's Heritage proposed wording highlighting that heritage should be brought to more diverse audiences in a way that is socially and economically inclusive.
- An individual respondent expressed concerns regarding the area shown as "Renewal Opportunity Sites" on Figure 31 as the three buildings identified need to be protected.

#### Aldgate, Tower and Portsoken (Strategic Policy S20)

There were 5 representations on this policy, which raised the following main points:

- Historic Royal Palaces requested clarification that this area of the City is inappropriate for tall buildings in accordance with Figure 21 in the Plan.
- TfL, in its capacity as a landowner in the area, supported a change made since the previous draft which refers to enabling residential development in appropriate locations.
- Tower Hamlets expressed support for the City's policy approach within this area and a desire to continue to work closely on the development of the joint cluster of offices, hotels and housing that sits on either side of the boundary.

#### City Cluster (Strategic Policy S21)

Approximately 90 representations were received on this policy and the main points are outlined below:

- To address the general conformity issues in relation to tall buildings, the Mayor of London recommended identifying and clearly mapping in principle acceptable locations for tall buildings, along with appropriate maximum heights. This is especially important in relation to the eastern and southern edges of the City Cluster where there are potential negative impacts on the Tower of London WHS.
- Historic England stated that it does not consider this policy to conform with either the NPPF or the 2021 London Plan. To ensure that future development in the Cluster does not cause harm to the significance of the historic environment, greater clarity is required as to building heights and locations for potential tall buildings proposals.
- The London Sephardi Trust and the Spanish and Portuguese Sephardi Community welcomed the statement that tall buildings "should make a positive contribution to the City's skyline, preserving heritage assets and settings..." (around 80 largely identical representations were received supporting this point).
- Historic Royal Palaces commented that without clarity on building heights, there is no way of knowing what the impacts would be on the Tower of

London WHS of the southern expansion of the Cluster to include 20 Fenchurch Street. HRP advocated that the 'Renewal Opportunity Sites' identified in Figure 33 should be allocated in the Plan and the policies for these should identify potentially affected heritage assets and how their significance may be affected.

- The Diocese of London sought reassurances in the policy that the Cluster will rise to a central peak approximating to the established height but stepping down uniformly to a more respectful scale at its perimeter. This will help ensure that the view of St Paul's does not become 'blinkered' over time diminishing its international status as a City landmark.
- The Surveyor to the Fabric of St Paul's observed that there is reference to the 'shape' of the Cluster, but details are not set out in the evidence base. This raised questions about how this had been arrived at, which stakeholders have inputted into it and how the wider setting of the Cathedral has informed it.
- Another respondent referred to recent planning application approvals and recommendations that apparently run counter to the policy aims, not least in the context of the Tower of London WHS and its Local Setting Area.
- A few business respondents welcomed the continued support of significant growth in office floorspace within the City Cluster, with one requesting specific reference to opportunities for enhancement of Leadenhall Market in tandem with the objective to accommodate significant additional office floorspace.
- A suggestion was made that streetscape enhancements in the area should strengthen connections to the river and improve the 'gateway experience' of entering the Cluster from the south.

#### Fleet Street and Ludgate (Strategic Policy S22)

There were 4 representations on this policy, which raised the following main points:

- The Fleet Street Quarter Partnership advocated a more radical and dynamic consideration of this area, arguing that the City Plan has to embrace the historic landscape of the Fleet Street area but also has to be innovative and creative in how it puts a modern layer on this. The Partnership set out a range of ideas on how Fleet Street could evolve, including giving it a new identity as a Tech and Legal hub by creating a Tech Quarter specialising in cyber security services.
- The Surveyor to the Fabric of St Paul's noted that there is no policy for St Paul's and considered this a significant oversight for a building and wider setting of such importance. It was suggested that the Fleet Street and Ludgate Key Area of Change should be expanded to include the area all around the cathedral, because that is required to effectively achieve the objectives of the policy.

#### Smithfield and Barbican/Culture Mile (Strategic Policies S23-25 and Policy SB1)

There were approximately 30 comments on this section of the Plan. The main points raised are outlined below:

- There was support for the Culture Mile proposals from some arts organisations and business respondents, while the Mayor welcomed Culture Mile as being in line with London Plan policy which encourages boroughs to identify, protect and enhance strategic clusters of cultural attractions.
- The Smithfield Market Tenants' Association (SMTA) argued that the City Plan must safeguard the Smithfield Markets in perpetuity unless a suitable alternative location can be agreed with the SMTA. It commented that no evidence has been put forward by the City Corporation indicating that Market use is unviable in the long term and that the 'use' contributes to the heritage value of the site as well as the built fabric. In the SMTA's view, consideration of future and alternative uses is premature whilst the Markets remain operational and protected by law.
- The Barbican Association felt that locating vibrant cultural uses in Smithfield would help both to give an identity to Culture Mile and to preserve the amenity of the large residential clusters of the Barbican and Golden Lane estates.
- Barts Heritage requested recognition of its proposals to revitalise the historic North Wing and Square at St Bartholomew's Hospital as a pioneering example of how health and heritage can be drawn together.
- New London Architecture (NLA) requested to be added to the list of cultural organisations who can make a contribution to Culture Mile, potentially through the creation of a centre of excellence for the built environment which would provide space for innovation, for start-ups and incubation.
- The Surveyor to the Fabric of St Paul's indicated that Chapter would welcome the opportunity to be involved in the development of routes and wayfinding between Culture Mile and the rest of the City.
- The Barbican Association expressed surprise at the lack of specific sites for further housing given that this area already has the largest clusters of housing in the City and the policy in the Plan of siting new housing next to existing clusters.
- Friends of City Gardens expressed concern regarding the omission of the Rotunda Garden from Policy S25 given that it is one of the few green spaces in this area and should be protected.
- It was commented that there should be greater acknowledgement of the unique character and heritage of the area.

### Liverpool Street (Strategic Policy S26)

There were 6 representations on this policy, with the main points arising outlined below:

- Network Rail stated that it appreciates the aspirations of this policy in relation to accessibility and capacity improvements at Liverpool Street Station. It will continue to work with the City Corporation and relevant partners and stakeholders with a view to identifying and delivering enhancement opportunities. Network Rail has produced a Liverpool Street Station vision document outlining its future vision and strategy for the station.
- British Land expressed support for the proposed enhancement of the area around Liverpool Street Station and the initiatives within the policy, which are aligned with its Broadgate Vision. Amendments were suggested to the

wording of the supporting text relating to transport and public realm improvements.

- TfL indicated that it is pleased the development of walking routes within and around Liverpool Street station have been considered in respect of the Elizabeth line opening.
- Tower Hamlets highlighted that Liverpool Street is identified in the London Plan as an area with more than local significance to the night-time economy and plays an important role in supporting the adjacent night-time economy centres at Shoreditch and Brick Lane, including providing public transport access via the night tube. The City Plan should acknowledge this role and the City Corporation should work with neighbouring boroughs to manage and enhance it.

### Planning Contributions (Strategic Policy S27 and Policy PC1)

There was only one representation on this section of the Plan, from TfL who requested that bus capacity upgrades and s106 contributions towards cycle hire infrastructure should be included.

### Whole Plan/General Comments

There were approximately 50 further representations that did not relate to specific policies or proposals but made general comments, some of which expressed support while others focused on areas of weakness or omissions. In some cases, these representations related to the wider context within which the City Plan has been prepared or to aspects of the supporting evidence base.

An outline of the main issues raised is set out below:

- Several respondents expressed support for the City Plan, citing elements such as its emphasis on greening and combatting climate change. The draft Plan was particularly strongly supported by arts and cultural organisations for its vision to create a vibrant cultural quarter in the northwest of the City.
- The CPA welcomed the vision and ambition of the Plan to help drive the City's recovery and sustainable growth over the next 15 years, while TfL felt that it integrated various important transport considerations well.
- However, some felt that it had been overtaken by events, with the Barbican Association querying whether it was already out of date. The Fleet Street Quarter Partnership commented on the need to think outside of the box and that the pandemic presented a rare opportunity for the City Corporation to press the reset button and to move the City positively ahead to ensure that it remains an attractive destination.
- A few individual respondents expressed opposition to the Plan's growth ambitions citing concerns about the impact of continual redevelopment on the character of the Square Mile. Others felt that the Plan was too passive in places by 'encouraging' developers rather than putting down clear boundaries and/or that it was too ambiguous.
- The Barbican Association observed that the draft Plan sought to fulfil a number of sometimes conflicting objectives without recognising the inherent

tension between them or providing a framework to manage the conflict. Healthwatch City of London also commented on the lack of detail on how competing objectives will be met, noting that many of the priorities compete for the same attention and limited space

- Some representations raised implementation issues. The Barbican Association and the Golden Lane Estate Residents' Association expressed concerns regarding the City Corporation's decision-making process on planning applications. Friends of City Gardens queried whether the City Corporation has sufficient resources to adequately evaluate, monitor and enforce high ecological standards.
- Aspects of the supporting evidence base were criticised by some stakeholders, especially from the heritage sector. Historic England commented that there remains work to be done to ensure there is a comprehensive evidence base in place in relation to the historic environment that has informed and helped shape relevant policies. The Surveyor to the Fabric of St Paul's Cathedral noted a lack of evidence relating to heritage protection for St Paul's, while the Victorian Society noted that the existing Conservation Area Character Summary and Management Strategy SPDs are increasingly out of date. Sport England also commented on an absence of evidence relating to indoor and outdoor sport facilities.
- Finally, the indicative nature of many of the draft Plan's maps/illustrations and the lack of precision was criticised by a couple of respondents.