

Appendix B: Proposed revised timetable and next steps

1. The proposed timetable towards adoption of the City Plan is outlined below:

Proposed timetable for revisions to the City Plan	
Month/Year	Summary of key tasks and milestones
January 2022	<ul style="list-style-type: none"> - Report to Local Plans Sub-Committee (date tbc) to agree outline project plan and to provide a steer on key issues - Prepare and issue briefs for updated evidence base studies by external consultants
February - June 2022	<ul style="list-style-type: none"> - Evaluate tenders and appoint consultants to undertake evidence studies (by end of February) - In-house updating of evidence base and additional work as required, including assessment of potential tall building locations - Informal engagement with a range of stakeholders including the Mayor and neighbouring boroughs under the 'Duty to Cooperate' - 'Call for sites' consultation in relation to potential residential development (April/May)
July 2022	<ul style="list-style-type: none"> - Finalise and publish updated/additional evidence base studies - Report(s) to Local Plans Sub-Committee (dates tbc) on the updated evidence, engagement with stakeholders, outcome of the 'call for sites' consultation and potential policy changes
July – September 2022	<ul style="list-style-type: none"> - Drafting of revised Proposed Submission Draft City Plan - Integrated Impact Assessment of material policy changes
September - December 2022	<ul style="list-style-type: none"> - Committee approval of revised pre-submission City Plan (<i>based on current committee dates which may be subject to change</i>): <ul style="list-style-type: none"> • Local Plans Sub-Committee (September – date tbc) • Planning & Transportation Committee (11 October 2022) • Policy & Resources Committee (17 November 2022) • Court of Common Council (8 December 2022) - Preparation of a range of updated supporting documents including topic papers and Statements of Common Ground with neighbouring boroughs/other key partners
December 2022 – February 2023	<ul style="list-style-type: none"> - Publication of revised Proposed Submission Draft City Plan for Regulation 19 consultation, starting immediately after Court and running for 8 weeks due to Christmas break (Target dates: Monday 12 December – Monday 6 February)
February – March 2023	<ul style="list-style-type: none"> - Analyse and respond to representations received and prepare documentation for submission - Appoint Programme Officer to administer the examination - Submission to Secretary of State (Target date: Friday 31 March)
April 2023	<ul style="list-style-type: none"> - Appointment of Planning Inspector to conduct the examination. The timing of the subsequent milestones below is indicative
Autumn 2023	<ul style="list-style-type: none"> - <i>Examination hearing sessions</i>
Late 2023	<ul style="list-style-type: none"> - <i>Receipt of Inspectors' report</i>
Early 2024	<ul style="list-style-type: none"> - <i>Adoption of City Plan</i>

Explanation of key tasks and processes

2. The proposed timetable outlined above reflects the recommendations in this report, namely to revise the emerging City Plan to ensure that it is fit for a post-Covid and climate-resilient future and to change the Plan end date to 2040 to align with the headline net zero target in the City Corporation's Climate Action Strategy.
3. The immediate priority is to review and update the evidence base underpinning the City Plan in light of the pandemic and other factors that may have changed since the original studies were undertaken. The long-term impacts of the pandemic remain uncertain and there may be a need to examine scenarios in relation to matters such as employment growth and office demand. However, it should be possible to make some reasonably robust assessments regarding post-lockdown trends as workers continue to return to their offices, particularly by spring/early summer 2022. Updates to the evidence base will also need to reflect the proposed extension of the plan period to 2040.
4. It is not necessary, nor feasible within available resources, to produce revised versions of all the evidence studies so far undertaken for the City Plan. Priority will be given to updating studies relating to topics that have been particularly affected by the pandemic and/or were subject to challenge during the consultation on the Proposed Submission Draft City Plan. Some of this work will be undertaken by in-house staff but external consultants will need to be appointed for more technical analysis, which inevitably takes time because of the need to prepare and issue briefs and to evaluate tenders received prior to appointing the selected consultants.
5. In some cases, new work may also be required, for instance to address the Mayor's objection in relation to the tall buildings policy or to address the emphasis given to design guidance and characterisation in the latest iteration of the NPPF. Decisions will be made in the context of the budget available, and a report will be brought to the Local Plans Sub-Committee early in the New Year to agree the overall approach.
6. For the reasons set out in the covering report, officers consider that it would be prudent to undertake a 'call for sites' consultation asking landowners to submit any sites they would wish to be considered for allocation in the City Plan for future residential-led development. Given the deteriorating housing land supply position, it is important to be able to demonstrate to a Planning Inspector that the City Corporation has actively looked for potentially suitable land for housing. Undertaking a call for sites consultation does not mean that sites submitted through this process would ultimately be considered acceptable for residential development, but it would enable the relative merits of different sites to be evaluated. Even if no sites were submitted through this process, that would in itself provide useful information about the current state of the residential land market and would strengthen the City Corporation's ability to argue at

examination for a pragmatic interpretation of national policy in the Square Mile. The report to the Local Plans Sub-Committee early in the New Year will set out more details regarding the proposed call for sites consultation.

7. During the first half of 2022, it is proposed to undertake informal engagement with stakeholders representing a range of interests, for instance to follow up on points raised in their consultation responses where appropriate, and to understand their views on the City's post-Covid recovery. Meetings will also be arranged with the GLA, neighbouring boroughs and other key bodies under the 'Duty to Co-operate' all of which will help to inform revisions to the City Plan.
8. Following the City elections, a new Grand Committee and Local Plans Sub-Committee will be constituted in the spring. One or more meetings of this new Sub-Committee will be arranged before the summer recess for officers to outline key findings from the evidence gathering exercise, call for sites consultation and informal engagement with stakeholders, together with their initial thoughts on potential policy changes. In light of the Member steer at those meetings, officers will draft a revised Proposed Submission Draft City Plan over the summer for formal committee approval during the autumn.
9. The timetable set out above reflects currently published committee dates and may be subject to change. Legal advice has confirmed that it is necessary under current Committee Terms of Reference for the pre-submission draft Plan to be expressly approved by the Grand Committee, Policy and Resources Committee and Court of Common Council. Given this requirement, the intention is to ensure all relevant supporting material is ready so that the City Plan can be published for Regulation 19 public consultation within a few days of being approved by Court in early December. There is a statutory minimum six-week period for consultations under Regulation 19 of the local planning regulations, but this would be extended to eight weeks to take account of the consultation overlapping the Christmas and New Year break. Regulations enabling on-line only consultation during the Covid pandemic will not be renewed by Government, so this consultation will require the physical publication, display and circulation of documents and in-person consultation events, if deemed to be desirable.
10. In order to avoid a further delay, it is currently envisaged that the report to the Grand Committee, Policy and Resources Committee and Court in autumn 2022 will seek delegated powers to submit the City Plan to the Secretary of State unless the consultation responses raise fundamental soundness issues that require a Member decision. Consequently, a target date of 31 March 2023 for submission is included in the above timetable.
11. Once the Plan is submitted, the process and timetabling will be largely in the hands of the appointed Planning Inspector and dates shown thereafter are indicative. They are considered to be realistic providing the matters highlighted in

the covering report, particularly the Mayor's general conformity objection, have been resolved in advance of the examination.

Risks

12. Pausing the review of the Local Plan to produce a revised version of the City Plan would not be without risks. The key risks are summarised below, together with an indication of the degree of risk and suggested mitigation measures where appropriate:
 - Age of current Local Plan: The adopted Local Plan is more than five years old and therefore no longer up to date using the Government's definition. National guidance indicates that in such situations a 'presumption in favour of sustainable development' which aligns with the NPPF should operate. This potentially makes the City more vulnerable to unwelcome development proposals that are justified as being sustainable but may not align with the City Corporation's aspirations. An example might be a housing proposal in an unsuitable location. However, it is not a new risk as the 2015 Plan became 'no longer up to date' in 2020, and it has not resulted in such applications being submitted so far. [risk – medium]
 - Weight attached to emerging City Plan: Since publication of the Proposed Submission Draft City Plan in March 2021, the City Corporation has attached some planning weight to the policies in the Plan when determining planning applications. A pause in taking the Plan forward and a commitment to material policy changes is likely to mean that such weight is reduced, and planning applications will need to be determined primarily against the policies in the NPPF, London Plan and the adopted Local Plan. It may be possible to attach some weight to the emerging City Plan on a policy-by-policy basis depending on whether individual policies have received support or objection through the consultation, the extent to which they comply with the NPPF and the London Plan and the extent to which they are likely to change before submission. [risk – medium]
 - Age of the evidence base: Much of the evidence base for the City Plan dates from 2016-18. The longer it takes to submit the Plan the greater the risk of it being found unsound due to an ageing evidence base. This risk can be mitigated by updating the evidence base but has financial consequences. However, even if the City Plan were submitted more speedily without making substantive changes, a Planning Inspector could conclude that the evidence base requires updating to reflect current circumstances. The neighbouring boroughs of Islington and Southwark are currently at examination and have been required to produce significant new and updated evidence during the examination process to support their respective local plans. [risk – high unless mitigated by new evidence]

- National planning reforms: The Planning Bill had been expected to propose radical changes to the Local Plan system including a zonal policy approach. Failure to advance the City Plan sufficiently to take advantage of any transitional arrangements in the Planning Bill could mean having to make further changes to align with this new approach. However, concerns from MPs and the recent change in national Ministerial responsibilities have led to a pause in the preparation of the Planning Bill and a review of the Government's original proposals. This has resulted in a delay in bringing legislation forward and may result in amendments to the proposed zonal approach, although at this stage we can only speculate on the eventual outcome. Careful monitoring of the national reforms, prioritisation of resources and efficient project management processes can help to mitigate this risk. [risk – medium]
- National deadline: The Government has set a deadline of December 2023 for all local planning authorities to have up to date local plans in place, although it isn't clear what the consequences would be of failure to adhere to this timetable. In any event, under the proposed timetable above the City Corporation is likely to be very close to adoption in late 2023, such that it is unlikely that any sanctions would apply. [risk – low]
- Housing land supply: Based on current trends, the housing land supply position will worsen over the next couple of years as units currently under construction are completed unless new permissions or proposals come forward. This poses a risk of the City Plan being found unsound by a Planning Inspector or of the Inspector requiring significant changes to the Plan at a late stage, such as site allocations. As outlined in the main report and the proposed next steps/timetable above, mitigation measures could include inviting City landowners to submit potential sites for consideration in the revised Proposed Submission Draft City Plan and to demonstrate the City's ongoing commitment to encouraging new housing in the right places. [risk – high unless mitigated by new supply or revised targets]
- End date of City Plan: Local plans are expected to look ahead over a 15-year period from adoption. The longer it takes to submit the City Plan the greater the risk of it being found unsound due to not complying with this requirement. This risk can be effectively mitigated by extending the Plan period to 2040 to align with the Climate Action Strategy, as recommended in the main report, but that will require amendments to the evidence base with consequent financial implications [risk – low]
- Reputational risk: Work on the Local Plan review has been ongoing for a few years. Rapidly changing external circumstances mean that amendments to the Plan are required for it to be regarded as a robust and sound plan for the next 15-20 years. Failure to address these external circumstances carries a reputational risk to the City Corporation. The pandemic is one of those rare

events that provides a stimulus to think differently and a commitment to produce a post-Covid Plan setting out a clear vision for the future of the City of London should substantially mitigate this risk [risk – low]

Resources

13. The covering report outlines the financial implications of revising the City Plan. It highlights that the current provision in the Planning Policy Local Risk budget of £120,000 to cover examination costs will be needed to refresh the evidence base during 2022, with consequential effects on the 2023/24 budget in terms of requiring additional financial provision to be made for the examination costs in that year. However, even if we were to submit the current version of the City Plan, a Planning Inspector could conclude that the evidence base requires updating to reflect current circumstances in which case additional costs would need to be absorbed in the 2022/23 budget. An examination of the current version of the City Plan would probably also incur additional costs as it would be longer and more expensive than usual due to the range of objections and the need to examine the post-covid circumstances.
14. There may be potential to share some costs by aligning evidence gathering for the City Plan with the review of the Transport Strategy and by utilising other evidence gathered and published by the City Corporation. However, the figure of £120,000 is only approximately half of what has been spent on the City Plan evidence base between 2016 and 2020, and that figure is itself modest compared to what many local planning authorities spend on their local plans. Accordingly, it would not be feasible to progress a revised City Plan without spending at least £120,000 on refreshing the evidence base. A more extensive consultation exercise would also require additional funding to be found.
15. Staff resources are being considered through the Target Operating Model process and are not considered in this report. However, it should be noted that there are currently a number of unfilled vacancies in the wider Planning Policy section, including in the Development Plans Team and the Monitoring and Information Team and that the current Director will shortly be retiring. The process of staff turnover and recruitment is an issue that could impact on the timetable set out above and may require temporary measures such as agency support or redeployment of staff to ensure this timetable can be met.