

Appendix B: Evidence base requirements in relation to key policy topics

Sustainable Development and Climate Change

1. The City Corporation has adopted an ambitious Climate Action Strategy with targets for net zero by 2040 in the Square Mile and climate resilience in our buildings, public spaces and infrastructure. These commitments sit alongside the NPPF's presumption in favour of sustainable development and the London Plan's sustainable infrastructure requirements in driving down carbon emissions and minimising resource use in the Square Mile.

2. The policy direction for Shaping Outstanding Environments (design, climate resilience & flood risk and waste & circular economy) was informed by the following evidence base:

GHG Baseline methodology and results for the Square Mile - June 2020 - Arup

GHG Baseline Scope 1 & 2 – May 2020 - Arup

City of London Adaptive Pathways Study - July 2020 – Buro Happold

Strategic Flood Risk Assessment - 2017 - WSP (to be updated in 2022)

Waste Arisings and Waste Capacity Study Review - 2016 – Anthesis

Local Plan Waste Monitoring Report - 2019/20 – City Corporation

3. The evidence base for this workstream is relatively up-to-date and is less sensitive to the impacts of the pandemic than some of the other key topic areas.
4. The City's draft City Plan 2036 policies on sustainable design, climate change, flood risk and waste & circular economy are underpinned by the London Plan's sustainable infrastructure and climate change policies and net zero targets. These policies remain valid but during last year's consultation several representations were received advocating a greater emphasis on whole life carbon and a presumption in favour of retention of existing buildings. To this end we will need to consider:
 - Whether to include a requirement for whole life carbon (WLC) assessments for all major development including WLC options appraisal to demonstrate that the development represents the lowest WLC emissions over its lifespan.
 - Whether to include an additional policy promoting a presumption in favour of retention of existing buildings. This would complement the existing Waste and Circular economy policy requiring much greater attention to the need to reuse existing buildings rather than demolishing and rebuilding.

Tall Buildings

5. The draft City Plan defines tall buildings as those which are over 75m AOD in height with the City Cluster identified as the most suitable area for development of tall buildings within the City. The existing Local Plan and the draft City Plan indicate that all of the City is sensitive to tall building development and also identify areas which are inappropriate for tall buildings – these inappropriate areas comprise those parts of the City impacted by strategic viewing corridors (the London View Management Framework), local views protection (St Paul's Heights and Monument Views), listed buildings and conservation areas. This is a long-standing policy approach in the City which had previously been agreed by Planning Inspectors, the Mayor and Historic England as an appropriate basis for planning for new tall building development.

6. The draft Strategic Policy S12 on tall buildings was informed by the following evidence:

Tall Buildings in the City of London, City Corporation Monitoring Report, 2020

Monument Views Study, City Corporation, 2020

St Paul's Heights Study, City Corporation, 2015

Protected Views Supplementary Planning Document, City Corporation, 2012

GIS mapping/City Maps

3D modelling

7. Objections were raised to the draft City Plan tall buildings policies by a number of consultees, including the Mayor of London, Historic England, Historic Royal Palaces and the Surveyor to the Fabric of St Paul's.
8. The Mayor has indicated that the draft City Plan's approach to tall buildings is not in conformity with the plan-led policy approach to tall buildings in the adopted 2021 London Plan. The City Plan is required by the NPPF to be in general conformity with the London Plan and the conformity objection is effectively a 'show-stopper' in that a Planning Inspector would require modifications to be made to the Plan to bring it into line with the London Plan.
9. The Mayor requires the City Plan to identify those areas of the City where new tall building development would be considered appropriate and, within those areas, to provide guidance on appropriate building heights. The Mayor expects this information to be set out graphically within the City Plan.
10. In order to align the Draft City Plan with the London Plan 2021, it is considered that further technical work will be required. Existing tall building mapping will need to be updated to include all schemes which are recently completed or in the development pipeline; which have a resolution to be approved by the P&T Committee in the near future; or which are subject to pre-application discussions.

11. 3D modelling will be used to test areas which are considered appropriate for tall buildings within the City and additional work will be undertaken to consider the potential development impact of tall buildings at the strategic level as well as at the local contextual level, giving consideration to heritage and townscape features.

12. The revised mapping/modelling will address the following:

- Define what is considered a tall building within the City context.
- Identify appropriate locations for tall buildings within the City (including the City Cluster).
- Determine acceptable building height range within the City Cluster and other areas that are considered appropriate for development of tall buildings.
- Use contour mapping to illustrate appropriate tall building areas and building heights.
- Evaluate potential development impacts of new tall buildings

13. Technical work in terms of characterisation studies will be undertaken to strengthen the tall buildings evidence base, inform the policy approach taken to development of tall buildings within the City and provide the basis for more detailed Design Guide work required under the most recent version of the NPPF.

14. Preparation of the revised data and mapping will be carried out within the Environment Department, with possible external support on 3D modelling, if required. Liaison will be required with officers at the GLA to ensure that the updated evidence meets the requirements of the London Plan 2021.

Offices and Employment

15. The City Corporation adopted an ambitious target in the draft City Plan 2036 to deliver 2,000,000 sqm of office floorspace by 2036 which complements the London Plan aim to promote economic and employment growth in the Central Activities Zone (CAZ).

16. The policy direction for the office policies in the draft City Plan was informed by the following evidence base:

London Labour Market Projections August 2017

City of London office floorspace target October 2018

London Office Policy Review June 2017

Local Plan monitoring reports September 2019

COL Innovation and Growth publications

Employment trends in the City of London 2019 Business Register employment survey (BRES)

17. Whilst the economic policies within the City Plan 2036 remain valid, during last year's consultation several representations queried the extent of the aspirations to grow office floorspace in the light of Covid 19. There is a need to determine how the long-term economic and social impacts of the pandemic, alongside other economic, social and environmental trends, might alter the City's office market, projected levels of employment growth and patterns of work and to examine scenarios in relation to office demand and a hybrid way/flexible way of working.

18. This analysis will inform planning policy on:

- The overall level of new office floorspace required in the City.
- The type of office space required, including the need for flexible, adaptable and affordable workspaces and potential space for creative industries.
- The location of new office workspaces.
- The need for complementary facilities to support office employment in the City.
- The potential to reallocate older office space to alternative commercial and social uses, including housing.

19. To this end we will need to consider:

- New employment data. It is understood that the GLA are to produce new employment projections in early 2022. These projections would replace the existing employment projections which are dated from 2017. New employment projections will be used as the basis for any revised office floorspace projections in the Local Plan.
- New research and publications from CPAT and Innovation & Growth teams and engagement with the City Property Association to compile industry-informed assessments on hybrid working patterns and post lockdown trends as workers return to offices in 2022. This would enable an updated assessment of the density of office occupation and complementary facilities required to attract and accommodate City office workers.
- Whether to revise requirements for marketing and viability evidence for loss of office floorspace. The need for healthy buildings and office environments, the transition to net zero office buildings and the 'flight to quality' in terms of increasing demand for new Grade A office space, is likely to mean an increasing supply of secondary, lower grade office stock. The revised City Plan will need to consider whether this stock can continue to contribute towards the City's office provision, or whether some should be utilised on a permanent or temporary basis for alternative uses. Whether or if any loss of offices would be harmful to the business city or represent an opportunity for diversity of use to increase City resilience will need to be considered.

Housing

20. The City Corporation encourages additional housing to be developed in line with targets set by the Mayor through the London Plan and informed by a London-wide Strategic Housing Land Availability Assessment (SHLAA). The achievement of these targets is based on the National Planning Policy Framework (NPPF) which requires local planning authorities (LPAs) to maintain a 5-year supply of specific deliverable housing sites to demonstrate that sufficient housing will come forward to meet projected need. LPAs are also required to identify a supply of developable sites for years 6-10 and, where possible, for years 11-15 of the Plan.
21. The NPPF and National Planning Practice Guidance define what is meant by 'deliverable' and 'developable' and which need to be reflected in Local Plan housing targets:
 - Deliverable – sites with full planning permission or outline permission on major sites
 - Developable – sites where there is a reasonable prospect of housing development
22. Windfall sites, those not previously allocated in a local plan, can be included as part of anticipated supply where there is compelling evidence that they will provide a realistic source of housing, either based on demonstrable evidence of past rates, or identified through the SHLAA.
23. The City of London is a global financial, business and professional services centre, where there has been a long-standing local policy priority for new office development. The London Plan 2021, Policy SD5, indicates that residential development is not appropriate in defined parts of the City of London and that elsewhere in the City, offices and other CAZ strategic functions should be given greater weight relative to new housing development. This approach is reflected in the relatively low annual housing target for the City of 146 dwellings.
24. The focus on commercial office development and limited need to deliver new housing has meant that to date, the City Corporation has not allocated housing sites, but rather has relied on windfall sites coming forward. However, it has become increasingly apparent that due to a diminishing supply of windfall sites, the Corporation may not be able to maintain the 5-year supply of housing sites as required by the NPPF in the future. On 31 March 2021, it is estimated that the City had a housing land supply of 4.5 years. Re-calculation of the supply as at 30 September 2021, taking account of housing completions early in the 2021/22 year, suggests that future land supply had fallen to approximately 3.7 years.

25. To ensure that the City Plan can meet NPPF requirements and demonstrate a minimum 5-year housing land supply, additional deliverable housing sites will need to be identified. Government guidance encourages LPAs to work with residents and stakeholders to identify suitable sites for inclusion in the Local Plan. A 'Call for Sites' consultation by the Corporation is therefore required. In the event that no suitable sites are identified, the City Corporation would be required by the NPPF and national Planning Practice Guidance to consult with neighbouring boroughs on the potential for those boroughs to meet some of the City's housing need.
26. The need for different types of housing in the City (including affordable units) is assessed through Strategic Housing Market Assessments (SHMA's). National, London Plan and current Local Plan policy requires new affordable housing to be provided on-site. However, the constrained City land market, the competing demands for commercial development, the lack of large housing sites and the high cost of land means that it is often difficult to achieve an element of affordable housing on sites being developed for housing.
27. Local Plan policy allows applicants as an exception to meet affordable housing requirements through an off-site commuted sum payment, which can then be used to provide housing on sites outside the City. The City Corporation owns and manages housing estates in a number of London Boroughs and has an active new build development programme to meet the needs of people on the City's Housing Waiting List. Using a commuted sum to deliver on City sites means that a greater number of housing units can be provided than may otherwise be possible within the City, but it does not help to achieve mixed and balanced communities within the Square Mile. Members have indicated a wish to further discuss affordable housing policy and delivery in the context of the preparation of the revised City Plan and in conjunction with the Housing team within Children's and Community Services. A dedicated session will be arranged in the spring/early summer to which Members of the Grand Committee will be invited.
28. The current policy direction for housing (housing targets, location, affordable element and amenity) is informed by the following evidence base:

City of London Strategic Housing Market Assessment (SHMA) Final Report 2016 & Addendum Report 2016 – GL Hearn

London Plan SHLAA 2017 – Mayor of London

London Plan SHMA 2017 – Mayor of London

City of London Housing Strategy 2019-2023 – City Corporation

City of London Planning Obligations SPD 2020 – City Corporation

Housing Delivery Test Action Plan 2020 – City Corporation

City Plan 2036 Viability Assessment 2020 & Update Commentary February 2021- BNP Paribas

29. The draft City Plan 2036 policies on housing comply with London Plan and NPPF guidance. However, the assessment of housing need and available sites is now almost five years old and, as set out above, it is likely that the City could no longer demonstrate the required 5-year supply of deliverable housing sites. The SHLAA and SHMA evidence documents are unlikely to be acceptable as robust evidence at an Examination into the Plan.
30. To this end, to inform the revisions to the City Plan, we will need to:
- Undertake a 'Call for Sites' consultation as set out in the covering report.
 - Using information from the Call for Sites, produce a local Strategic Housing Land Availability Assessment (SHLAA) for the City of London.
 - Update the City's Strategic Housing Market Assessment (SHMA) to identify current housing need including the need for affordable units.

Culture and Visitors

31. While the City has long been home to a concentration of well-known arts and cultural facilities, in recent years culture and visitor activities have gained greater prominence through the Culture Mile initiative and public spaces such as roof terraces and viewing galleries being made available to visitors. The number of hotel bedrooms has increased, and the night-time economy has expanded. The Mayor of London is encouraging boroughs to promote and embrace night-time economy activities and made comments about the potential to further boost the City's night-time economy in response to last year's City Plan consultation.
32. A Culture SPD is being prepared which will set out expectations regarding the provision of cultural infrastructure within the City and provide further guidance on producing a 'Cultural Plan', a new policy requirement for major developments introduced in the emerging City Plan. The City Corporation's current Cultural Strategy covers the period 2018-2022, while the Visitor Strategy covers the period 2019-2023. A more ambitious visitor destination strategy is currently being developed as part of the City Corporation's response to the pandemic.
33. The London Plan advises that 40,000 additional hotel rooms are needed in London by 2036. The London Plan's hotels evidence base dates from 2017 and does not take account of significant economic and social changes since that date or the potential impacts of Covid. The City of London has seen a substantial increase in developer interest in new hotel and visitor provision and has exceeded the number of hotel rooms expected by the GLA. In March 2021, the City's hotel bedroom stock had increased to 6,475 bedrooms, with several further major hotel schemes either with planning permission, application submitted or the subject of pre-application discussion.
34. The Mayor of London is currently developing guidance to assist local authorities in developing night-time strategies. A database of night-time entertainment premises and activities has been set up for authorities to use as a resource and a guidance note to demonstrate good practice.
35. The policy direction for culture and visitor facilities in the draft City Plan was informed by the following evidence base:

Projections of demand and supply for visitor accommodation in London to 2050 – GLA Economics 2017

A Tourism Vision for London – London & Partners 2017

Culture Mile Look and Feel Strategy 2018 – City of London Corporation

City of London Cultural Strategy 2018-2022 – City of London Corporation

City of London Visitor Strategy 2019-2023 – City of London Corporation

36. The draft City Plan 2036 policies on culture and leisure comply with London Plan guidance and hotel targets for the City in the London Plan are being achieved. There is significant data on culture, leisure, hotels, and the night-time economy available from GLA work as well as the Corporation's research and strategy development, albeit some of this as mentioned above is pre-pandemic. There is increasing interest in hotel and visitor-related developments, which need to be considered in the context of other competing demands on land-use in the Square Mile.
37. To this end we will need to consider whether to commission consultants, or to produce in-house, further evidence on this topic area including a potential hotel demand study and a potential night-time economy strategy. Joint working with Innovation and Growth and the City Corporation's Cultural and Visitor Development Director will be required.

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Retailing

38. The Covid-19 pandemic has resulted in the temporary closure of many retail units in the City and several high street names entering administration. It is recognised that both the retail and hospitality sectors in the City have been particularly hard hit by the pandemic, given that both sectors are reliant on high levels of footfall from office workers many of whom have been working from home since March 2020. Changes to the Use Classes Order introduced in September 2020 have also allowed greater flexibility and the ability to switch uses between retail, office and some community and leisure uses without the need for planning permission.

39. The policy direction for the retail policies in the draft City Plan is informed by the following evidence base:

Retail Needs Assessment Study – Colliers (November 2017)

Retail Needs Assessment Study Update - Colliers (January 2021)

Local Plan Retail Units Monitoring Report 2011-20 City of London (July 2020)

Local Plan Retail Units Principal Shopping Centre Monitoring Reports - City of London (July 2020)

40. Policy CS20 (Retailing) sets out the policy context in the current Local Plan and Policy S5 (Retailing) details how this will evolve in the future in the emerging City Plan. The London Plan identifies Cheapside, Fleet Street, Leadenhall Market, Liverpool Street and Moorgate as Central Activities Zone (CAZ) Retail Clusters, which are interpreted as Principal Shopping Centres in the adopted and emerging Local Plan.

41. The draft City Plan policies remain in conformity with the London Plan and factor in the impact of pre-pandemic retail changes including a shift to online. However, they do not take account of any longer-term impacts arising from the pandemic, particularly the impacts of home working and potential future hybrid working patterns which may lead to prolonged or permanent reductions in footfall.

42. During last year's City Plan consultation representations were received on the impact of the pandemic on retail trends and the ever-changing retail landscape. Whilst many comments supported the Local Plan's aspirations to retain and promote retail provision, some respondents questioned the growth assumptions underlying the retail policies. To this end we will need to consider:

- Refreshing the existing retail evidence which largely pre-dates the pandemic, to consider the longer-term impacts of changes in working patterns and to reassess the policy approach informed by this updated evidence and the role of other 'town centre' uses.

- Redrafting the retail policies to reflect the changing circumstances of the retail market (including the more rapid shift to online retail) and the changes made by the Government to the Use Classes Order.
- Whether and how to encourage the development of new business models and improve the leisure and entertainment offer for visitors in the City through 'pop-ups', meanwhile uses, experiential retail, cultural activities, and art installations.
- Whether further external consultant advice would be helpful in understanding retail growth patterns, or whether there is sufficient anecdotal and non-City specific evidence that could provide a robust framework for policy development.

Sports and Leisure

43. The City Corporation delivers sport and physical activity within the Square Mile primarily through the Golden Lane Sport & Fitness Centre. In 2012, Fusion Lifestyle was appointed to be the managing partner for the delivery of Golden Lane Sport & Fitness and the City's Sports Development Service.
44. When Fusion Lifestyle commenced the contract there was an existing Sports and Physical Activity Strategy (titled – Mile's More Active) which has shaped the delivery across the Square Mile and at locations across London which are owned by the City Corporation. Although it was not fully formally adopted by the City Corporation, it has acted as a guide for the City Corporation and Fusion Lifestyle since 2012.
45. The Sport, Leisure and Culture Consultancy (SLC) was appointed to support The City of London Corporation and Fusion Lifestyle in the development of a new Sport and Physical Activity Strategy for 2015-2020. The Strategy provided a vision and priorities for Sport and Physical Activity over a five-year period and a comprehensive action plan.
46. An in-depth strategic review of national, regional and local strategies was undertaken to inform the development of the strategy. This highlighted the priority given to improving health and increasing physical activity and the challenges specific to the City of London including a very high-density workday population, limited open space or accessible facility provision, pockets of high deprivation and health inequalities and cultural and estate-based access barriers.
47. The draft City Plan 2036 policies on sport and leisure comply with London Plan guidance and are informed by the following evidence base:

The City of London Corporation - Sport and Physical Activity Strategy 2015-2020

Mayor of London - Sport for all of us – 2018

48. The evidence base underpinning the policies on sport and leisure is quite limited and a few years old and this was raised as an issue by Sport England in response to last year's City Plan consultation. A draft 2020-25 Sports and Physical Activity Strategy was considered by Policy & Resources Committee in February 2020, with a recommendation that further evidence gathering and work be undertaken.
49. Further work on the role of sports and leisure within the City of London is being led by Town Clerks as part of the development and adoption of a wider sports strategy for the City of London, aligned with the City Corporation's vision for a post-Covid City. Evidence gathering is being progressed, including the intention that an external consultant will shortly be appointed to undertake a 'diagnostics check' on

the current status of the City's sport and leisure provision and to make recommendations on how to maintain and improve this service in future. The outcome of this work should be available to feed into a review of the draft City Plan's sport and leisure policies.