

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE
Monday, 31 January 2022

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at the Guildhall on Monday, 31 January 2022 at 1.45 pm

Present

Members:

Deputy Alastair Moss (Chair)
Randall Anderson
Christopher Hill
Deputy Jamie Ingham Clark
John Edwards
Oliver Lodge
Deputy Graham Packham

Officers:

Juliemma McLoughlin	- Executive Director, Environment
Adrian Roche	- Environment Department
Lisa Russell	- Environment Department
Peter Shadbolt	- Environment Department
Gwyn Richards	- Environment Department
John Harte	- Environment Department
Liam Hart	- Environment Department
Michelle Price	- Environment Department
Garima Nayyar	- Environment Department
Gemma Stokley	- Town Clerk's Department

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

1. APOLOGIES

Apologies for absence were received from William Upton QC.

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

There were no declarations.

3. **MINUTES**

RESOLVED – That the public minutes of the last meeting held virtually on 4 November 2020 be approved as a correct record.

4. **LOCAL PLAN - NEXT STEPS**

The Sub-Committee considered a report of the Executive Director, Environment regarding next steps for the draft Local Plan, City Plan 2036, which was published for Regulation 19 pre-submission consultation between 19 March and 10 May 2021. The Executive Director, Environment introduced the report and outlined the key areas for Members.

The Sub-Committee noted that it had taken a report to the Planning Transportation Committee in December 2021 outlining the progress on the local plan and seeking approval to pause progress to enable further work to be done. This work was in relation to the objection from the Mayor of London to its tall buildings policy and the housing supply situation. There were also some wider concerns regarding the plan, such as it being completed prior to the Covid-19 pandemic. It was noted that the advice from the Inspectorate was to continue as if the pandemic had not occurred. However, it became increasingly clear that the policies in the local plan might be out of line with the real world. It was therefore proposed that the Sub-Committee revisit the data and trends and engage with partners and stakeholders to obtain external views. Following this, it was proposed that the plan be revised, and the Sub-Committee create a plan setting out a clear and robust strategy for the post-pandemic City.

The Sub-Committee was advised to consider the key areas of evidence gathering needed to carry out to take the plan forward, provide views on these and determine if there were any areas of policy that have been missed.

The Sub-Committee had regard to the first area of the paper, sustainable, development and climate change. It was noted that the Local Plan addressed a number of issues, including achieving zero carbon by 2040. The Executive Director, Environment advised that with greater emphasis on climate change further work was required on, for example, the extent to which the Sub-Committee should focus on the refurbishment and retention of existing buildings rather than new developments. The Sub-Committee noted that it was intended that the plan would be extended to 2040 to align with the e3nd date of the Climate Action Strategy (CAS).

A Member suggested that there should be a presumption in favour of existing buildings, and if not, the developer should provide detailed justification as to why a new build was justified. Furthermore, where permission for new builds was granted, then sustainability should be a key design goal, particularly in respect of aspects such as below groundwork foundations which carried significant carbon footprints. Conditions and design goals should also be secured that maximise the reuse of major parts of the building in the future and minimise the carbon impact. The Chair endorsed this point, commenting that future-proofing was important point to be added to the promotion of sustainable materials.

A Member noted the greater focus on whole-life carbon and added that the Sub-Committee should consider the extent to which alternate uses of buildings as part of retaining the whole-life carbon could or should be permitted as this would affect decisions on whether to demolish existing buildings.

A Member noted that there was an absence of emphasis on common methods of supplying energy within the whole Square Mile, which could be promoted further as has been done elsewhere. The Member added that the organisation could start to implement things on behalf of developers and buildings such as the use of underground pumps to circulate warm water. It was noted that technology was improving in this space and that it may be a good time for the Local Plan to address this, such as offering contributory funding, with a view to payback on the energy supplied, or identifying possible sites for larger-scale measures, which may encourage hesitant developers or make more ambitious schemes more economically viable.

In response to a question from a Member, the Executive Director, Environment advised that the Local Plan could include a policy regarding the use of embedded carbon in existing buildings, but decisions to reject planning applications could not be taken on the basis of that policy alone being breached and would have to be a factor weighed against the merits of said application. The Chair added that he had observed a natural trend in applications seeking to make better use of embedded carbon and away from straightforward demolition of existing buildings but noted that strengthening Local Plan Policy may help entrench this.

A Member commented that it would be preferable for the City of London Corporation to ensure that ground or air source heat pumps were connected to the organisations building or take steps to create a better market for the products, before dictating or insisting on their use by others. The Member noted that cheaper technology may be possible and encouraging other parts of the market to provide solutions may be better than mandating any specific solution.

The Chair summarised that the Sub-Committee would like to see alternative energy, the future-proofing of buildings, the purpose of the CAS, and the alternative use of buildings addressed. A Member suggested procuring an external consultant to assess which forms of green energy were most easily or widely applicable in the Square Mile, with a view to creating clear possibilities for developers. The Executive Director, Environment noted the suggestion of providing a strong focus, but advised against endorsing any one type of technology. The Chair added that the City Corporation likely had in-house expertise which could be directed to make the suggested assessments on green energy. A Member commented that the Sub-Committee should focus on outcomes rather than processes or mechanisms.

The Sub-Committee then considered the issue of tall buildings. The Executive Director, Environment advised that an objection from the Mayor of London had objected to the existing policy on tall buildings in the Local Plan and had asked the City Corporation to identify specific areas within the City of London where tall buildings would be most appropriate, and to assess how tall buildings in that

area could be. This would require technical work in assessing the current landscape and modelling based on that data in line with other Local Plan policies, particularly around Protected Views. A Proposal was set out to undertake this further technical work which would be done in-house, with characterisation work to assess how tall buildings would fit into various areas.

A Member queried the description of the Mayor of London's objection and asked what the organisation was being asked to do, particularly in how far this would mandate the height of buildings in particular areas. The Executive Director, Environment advised that much of the work requested had already been done over previous years and advised that further work undertaken would be in the context of considering views, and how this would be conveyed. However, a detailed assessment in this area would be unlikely to facilitate a clear policy on maximum heights due to other factors.

In response to a question from a Member about the motivation for the Mayor's submission, the Executive Director, Environment advised that the City of London had been somewhat out-of-step with the GLA and national policy in this area during recent years, by taking a view on where tall buildings would be inappropriate, rather than appropriate, implying that tall buildings could be appropriate elsewhere, subject to the detailed assessment of individual schemes. This had been discussed with the GLA during the preparation of the draft Local Plan but was not raised as a significant issue until the tall buildings policy in the London Plan was amended at the direction of central government. Consequently, definitions in the Local Plan would have to be more precise and provide an indication of scale. The Executive Director, Environment further advised that clustering tall buildings carried benefits in managing micro-climates.

The Chair noted that whilst this could be a positive step, it would have to be taken in the context of other policies and was likely to be heavily caveated, before asking how the designation of an appropriate area for tall buildings would be handled, given it was likely to cause controversy and opposition from landowners wanting to be either included or not included. The Executive Director, Environment responded that it would be driven by views, and that much of the assessment work had already been carried out over a number of years, and existing data could be used to predict floorspace, population and structural possibilities. The Executive Director, Environment advised that the caveats to the policy would be critically important and would tie into other policies, and that it would be important to capture nuances within the evidence base. The Chair added that it would be a difficult subject to navigate but hoped that the debate would be productive and that a broad consensus could be found.

The Sub-Committee then moved on to offices and employment. The Executive Director, Environment advised that this relevant to the discussion on tall buildings. A view would need to be taken on how much office spaces would be needed going forward, and on converting employment forecasts into office space. Account would need to be taken on the long-term impact of Covid-19, such as with regards to hybrid and remote working, and the trends around

office employment, growth and new ways of working. The Chair commented that the City Corporation could set a strategic direction for the City and could influence others, and the use of space fed into the sustainability discussion and was an important part of the discussion.

Members commented that a decision would need to be taken well before it was clear what the longer-term reality would be which created a significant difficulty. A Member commented that landlords would have to adjust to the market, particularly in respect of the quality of buildings, and it was possible that increased affordability in certain areas could encourage more SMEs and start-ups, which would be healthy for the City. The Sub-Committee noted that leases were not being devised on the basis of use during part of the week, and asset owners were likely to insist on a degree of occupancy throughout the week. A Member suggested that due to the uncertainty, as much flexibility as possible be built into the Local Plan, such as considering residential applications on a wider basis. Another Member suggested that Destination City be considered with regards to what could be provided.

The Sub-Committee noted the City Corporation's investment in Crossrail, and that it would be important to maximise the opportunity of this investment, with the opening of Crossrail approaching. A Member commented that the maximum economic benefit for areas in the vicinity of Crossrail stations needed to be factored in, which was likely to be benefits rather than residents. Another Member added that pedestrian comfort levels were a reasonable proxy for whether an area was overcrowded generally, and this should be applied more consistently in making assessments in respect of office space and employment. The Sub-Committee noted that the pipeline of planning applications would be somewhat indicative, as developers would not put forward schemes for which they did not think there would be adequate demand.

The Chair added that if the City Corporation set the tone, developers would be likely to follow, and proposed starting with assessing capacity, with regards to other factors such as transport as well as office space and basing aspirations on that. Members further recognised that flexibility would be beneficial, as well as the overall appeal of the City of London. The Executive Director, Environment advised that social mobility and inclusion would also need to be taken into consideration.

The Sub-Committee then moved on to housing. The Executive Director, Environment noted that this had been the subject of much debate at Committee and advised that it was key to ensure that there were enough housing sites in the Square Mile. Currently, areas where residential use was preferred were identified where there was less demand for office space, and these areas were largely around the edge of the City. This approach had been taken for a number of years and was relatively successful, with demand for residential spaces having been sufficiently concentrated in these areas that additional areas had not been required, and very few new housing schemes had been put forward in the last few years. Going forward, some further housing sites would need to be identified, and the Sub-Committee was asked to agree that this

process be undertaken following the Court of Common Council elections in March 2022.

A Member commented that they were supportive of undertaking a call for sites but added that Local Plan policies may need to be altered in order to encourage housing schemes, particularly in areas adjacent to existing housing. Another Member added that any call for sites would have to be clear that it was not a referendum or to be treated as such. Recalling the deed of variation considered at the last Grand Committee meeting, the Member added that there needed to be more deliverable provision of affordable rents in the City, as this was not currently being fulfilled. The Sub-Committee noted that the affordable element of schemes did not currently have to be provided within the City of London and could be done elsewhere, so was not a barrier in planning terms to housing schemes.

A Member commented that the cluster idea was effective because people generally preferred to live around other people, and that these areas would have related amenities such as green space nearby. The Member added that adding housing in isolated areas in a bid to increase numbers, without the required strategy and associated planning, would be detrimental and would be likely to end up as short-term lets or part-time homes. Another Member echoed the point around strategy, adding that a shift of focus from business and residential would be a significant sea change and would need to be considered on that basis. The Member added that if the evidence provided by a call for sites indicated that there was little opportunity for more housing sites, this would provide a compelling case for retaining the business focus going forward.

The Executive Director, Environment advised that a five years' supply of land was required for the Local Plan to be compliant and noted that affordable housing built elsewhere would not count towards the City's targets. The Executive Director, Environment added that the right type of housing was as important as numbers and this needed to be drawn out in the Local Plan. A Member commented that it was important to ensure that there were not competing priorities, and that other announcements would need to be taken into account so that they were joined up. In response to a question from a Member, the Executive Director, Environment advised that the five years' supply of land was measured by sites which were deliverable, i.e., sites which had planning permission or have confirmed commitment from a developer to achieve planning permission. The Member asked for further information to be provided on the methodology around the five years' supply.

The Chair commented that the Community & Children's Services department could be consulted on needs and advice on longer-term strategy, and that the organisation should be prepared to make representations in respect of the outlook for housing at local and national level. A Member noted that if the call for sites did not provide a clear route to satisfying the five years' supply, then other policies would need to be adjusted to make this possible. The Executive Director, Environment suggested that the Local Plan do more to explain what the City Corporation does for housing across London as a whole, as whilst it

was not counting towards the City's targets, housing elsewhere was still being delivered.

The Chair then drew the Sub-Committee's attention to culture and visitors. The Executive Director, Environment explained that a target was in place for hotel bedrooms and there was currently a significant demand for new hotel provision within the City, indicating confidence in a strong recovery in the tourism market. Further work was therefore required to assess this demand and consider where it would be most appropriate. The Chair commented that hotels provided facilities as well as bedrooms, which was beneficial for businesses who used these facilities such as conference spaces.

The Executive Director, Environment then moved on to retail, and advised that this was one of the most difficult to deal with post-Covid, as the City's retail provision was dependent on office workers. The Local Plan included a set of retail policies which pre-dated the pandemic and were based on traditional methods. Therefore, it needed to be considered how realistic this would be going forward, and if not, how an effective retail sector would be maintained. The Executive Director, Environment advised that further work was required, including consultation with stakeholders and businesses. The Chair commented that there may also be opportunities post-Covid and added that the West End was seeing a return to pre-pandemic footfall, which would hopefully also be reflected around the City's destinations.

A Member commented that Fleet Street had been hit particularly hard by the pandemic, amongst other factors such as the major project developments and advent of online retail but noted that there were other areas of London which had countered this and suggested commissioning work to assess how these areas had maintained their retail centres in this environment. The Member further commented that the retail offer in the City was becoming more homogenous and wondered whether the City Corporation could take a more active role in curating the retail offer in the City, citing the Bloomberg Arcade as a positive development. Another Member commented that he felt it was unlikely that footfall would return to the intensity of pre-pandemic levels consistently throughout the week and the retail sector would likely need to adjust to this, as visitors would increasingly be needed in place of office workers.

The Executive Director, Environment advised that the '7-day City' was an important focus, and that there was a degree of ability to curate the City on the basis of its users and make significant changes where they were felt to be required. A Member commented that the current Business Rates model was a key determinant for the City's retail, and that representations could be made to the GLA on reforms in this area that would provide the necessary support. Another Member commented that Crossrail may yet facilitate a significant uplift on both visitor and commuter numbers.

The Sub-Committee then considered sport and leisure. The Executive Director, Environment advised that Local Plan currently focussed on Golden Lane Leisure Centre as the public facility, and encouraged private facilities, which occasional public realm offer. This approach was now felt to be out of date and

needed to be updated, with work having been commissioned to assess the current facilities and the possibilities for additional provision. A Member commented that the Barbican Podium and planned riverside park by Blackfriars, amongst other areas, would provide additional open space that was accessible to the public. The Member added that this should be utilised to provide facilities such as open-air gym equipment, and that temporary facilities like yoga classes should also be facilitated and encouraged on a wider basis. Another Member added that the eastern end of the City was particularly underserved in terms of facilities, and this should be part of the focus for updating the Local Plan in this area.

Arising from the discussion, the Chair then drew the Sub-Committee's attention to the recommendations, which were agreed, subject to consideration of the comments provided by Members.

RESOLVED – That the Local Plans Sub Committee:

- Note the proposed timetable set out in Appendix A, which was agreed by the Planning & Transportation Committee in December 2021; and
- Subject to consideration of the comments provided by Members, agree the proposed approach to further evidence gathering set out in Appendix B.

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

There were no questions.

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

There was no other business.

The Chair then thanked Members and officers in attendance for their contributions, before closing the meeting.

The meeting ended at 3.25 pm

Chair

Contact Officer: Gemma Stokley
tel. no.: 020 7332 3414
gemma.stokley@cityoflondon.gov.uk