

Committee(s)	Dated:
Local Plans Sub (Planning and Transportation) Committee	22/07/2022
Subject: City Plan 2040: Proposed policy directions and timetable	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,4,7,9,11,12
Does this proposal require extra revenue and/or capital spending?	Yes
If so, how much?	To be confirmed
What is the source of Funding?	To be confirmed
Has this Funding Source been agreed with the Chamberlain's Department?	No
Report of: Gwyn Richards, Planning & Development Director, Environment Department	For Decision
Report author: Peter Shadbolt, Environment Department	

Summary

The draft City Plan 2036 was published for public consultation between March and May 2021. This report provides an update on the City Plan and proposes broad policy directions for a revised version, considering consultation responses and other issues. It also includes an updated timetable for progressing the Plan to a further public consultation and onward to public examination and adoption. Member views are requested on the scope of these policy directions and on how the Sub-Committee would like to be involved in the review progress, including the frequency of future meetings.

This report follows a previous report summarising the outcome of the consultation exercise, which was considered by the Grand Committee in December 2021, and a further report that outlined the proposed approach to evidence gathering, which was considered by this Sub-Committee in January 2022.

Recommendation(s)

Members are asked to:

- Advise on the proposed policy directions and agree the timetable for progressing the City Plan.

Main Report

Background

1. The City Corporation is preparing a new local plan to replace the current City of London Local Plan, which was adopted in 2015 and sets out development requirements up to 2026. A Proposed Submission draft of the new City Plan covering the period to 2036 was published for consultation between March and

May 2021 (referred to as the 'Regulation 19' stage). A total of 1,327 formal representations were received from 171 respondents. Full copies of the original representations, with personal details other than names redacted, have been published on the City Corporation's website at <https://www.cityoflondon.gov.uk/services/planning/planning-policy/local-plan-review-draft-city-plan-2040>.

2. In December 2021, the Grand Committee considered a report on key issues raised during the consultation. This report also outlined policy areas including tall buildings, climate change, offices, retail and housing where consultation feedback and/or other factors indicate that material changes will be needed to ensure that the City Plan will satisfy the relevant soundness tests at Examination and to provide a robust policy framework to guide future development.
3. The Grand Committee agreed to revise the draft City Plan as outlined in the report and to extend the timeframe of the Plan to cover the longer period to 2040, in particular to align with the headline net zero target in the City Corporation's Climate Action Strategy.
4. The Local Plans Sub-Committee in January 2022 considered a further report which outlined in more detail the additional evidence that would be required to support a revised City Plan. The Sub-Committee agreed that, in updating the evidence base, priority should be given to 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. The Sub-Committee also noted that additional new evidence would be required to address the Mayor of London's concerns about the City Plan tall buildings policy.

City Plan Strategy

5. Following the Sub-Committee in January 2022, further work has been carried out to identify the key changes in policy for the Corporation to progress the City Plan. These changes are needed to reflect City Corporation strategies, specifically the Climate Action and Destination City Strategies, to provide a robust policy framework which responds to changes in demand and use for office floorspace and retail trends post pandemic, and to respond to issues raised during the consultation regarding tall buildings and in relation to the Bevis Marks Synagogue.
6. Appendix A summarises the policy shifts and related workstreams that are proposed to be taken forward as the Plan progresses during the autumn. Members are asked to consider these policy shifts and confirm that they are happy with the direction of travel indicated. Members are also asked to identify any other areas of policy shift that they would like officers to consider as the Plan progresses.
7. It should be noted that, while these policy changes are substantial and will have a meaningful impact on the future development of the Square Mile, this work builds on the forward-thinking vision and spatial strategy set out in the draft City Plan. A number of the policy changes have also been signalled in earlier reports

to this Sub-Committee and the Grand Committee, and in these instances officers have further refined the scope of change and the evidence required.

8. Alongside policy changes, there is also a significant opportunity for changes to be made to the format of the Plan and the way that the Corporation engages with its communities, to produce a plan which is exemplary. In doing so, the Plan can anticipate a number of the directions of travel signalled by central Government through the Levelling Up and Regeneration Bill. Key changes are:
 - a. **Production of a digital City Plan.** An online, digital version of the Plan will incorporate 3D visualisations and modelling which will enable a fuller understanding of the opportunities and constraints on development and allow City communities to explore in more depth the Plan's evidence and data and see how it has shaped the Plan's policies. The Government is moving toward more digital planning and the City's work will anticipate some of this ambition. A digital Plan will be presented alongside the more traditional style of Plan to ensure that it remains inclusive and accessible to all.
 - b. **Meaningful engagement.** The City Corporation is revising its Statement of Community Involvement and looking to reset the way that we consult on planning policy documents (as well as on planning applications) to ensure that the consultation is meaningful and allows all of the City's communities to participate in, and contribute to, the development of policy. The revised Statement of Community Involvement will be brought to the Grand Committee in the autumn. Officers are in the process of purchasing an online consultation platform that will enable information to be presented in a more user-friendly and attractive way and makes full use of social media to engage with communities alongside other forms of consultation. A detailed consultation strategy will be developed as the Plan progresses, setting out how the City's communities can get involved and be kept informed at each stage of the Plan-making process. The proposed timetable for the Plan will also enable consultation to be dovetailed with consultation on a revised Transport Strategy.

Effective and practical implementation of the Plan. An Implementation Strategy will be developed alongside the Plan, setting out how the Plan's policies will be implemented and monitored. The Implementation Strategy will show how new development, partnership working and the City Corporation's own programmes and strategies will work together to bring about the vision set out in the City Plan. It will be regularly monitored and reviewed, so that implementation of the Plan can respond flexibly to changes on the ground.

Timetable

9. To achieve the policy shifts set out in Appendix A, a range of new and updated evidence will be required.

10. Appendix B sets out a revised timetable for progressing the Plan, which envisages a series of meetings with the Sub-Committee for the rest of this year, prior to taking the Plan to the Grand Committee in February 2023. This would be followed by consideration by Policy & Resources Committee and Court, prior to public consultation which is expected to commence in May 2023. This timetable is ambitious. To help achieve it, officers consider that regular meetings of this Sub-Committee will be required through to the end of 2022, preferably on a monthly basis to enable consideration of draft policies as they develop and to provide feedback on important evidence reports and policy directions. Further evidence work, including a Plan-wide viability assessment and completion of the Integrated Impact Assessment, will be required in January 2023.
11. The timetable set out in Appendix B involves a slight delay to that agreed by the Grand Committee in December 2021, which envisaged consideration of the draft Plan by the Committee in October 2022, due to staffing changes and shifting priorities. This delay has had the advantage of allowing extra time for post-pandemic working and commuting patterns to emerge more fully and for Corporation strategies, such as the Destination City strategy, to be developed and inform the revised Plan. The delay has also meant that officers have been able better understand the Government's ambitions for the planning system as detailed in the Levelling Up and Regeneration Bill.
12. Members are asked to confirm agreement to the proposed timetable.

Evidence studies in progress

13. Consultation has commenced on the Whole Lifecycle Carbon Optioneering Planning Advice Note. This was agreed in draft by the Grand Committee on 7 June 2022 and has now been issued for public consultation until the end of September. It is intended to strengthen policy requirements in the draft Plan in line with the draft Planning Advice Note, taking on board comments during this consultation.
14. Public consultation on a Housing Call for Sites took place between 23 May 2022 and 4 July 2022. This consultation asked consultees to nominate potential new housing sites which could be allocated for development in the draft Plan. Only 4 sites were proposed. These are currently being considered by officers. Proposed sites and officer recommendations as to whether they should be taken forward into the Plan will be brought back to this Sub-Committee in the autumn.

Corporate & Strategic Implications

15. The preparation of the City Plan is informed by the Corporate Plan (2018-23) and the new Plan, when adopted, will help to implement a number of Corporate Plan objectives. It will support the delivery of key Corporate priorities, along with proposals to ensure a sufficient supply of business space and complementary uses to meet future needs. Preparation of the revised City Plan will be undertaken alongside the review of the Transport Strategy and the revised end date of the City Plan (2040) will align with the key net zero target in the Climate Action Strategy.

Financial implications

16. As set out in the December report to the Grand Committee, approximately £220,000 has been spent to date on commissioning studies to support the City Plan over a 5-year period. At the January Sub-Committee meeting, it was estimated that at least £100,000 would be needed to update key parts of the evidence base. Further assessment of the evidence needs and for consultancy support has been undertaken suggesting approximately £200,000 will be required to update the evidence base and undertake statutory assessments. Currently there is provision for £120,000 in the Planning Policy Local Risk budget, which could be used to update evidence documents. However, additional funding will need to be found to ensure that the Plan is ready for consideration by the Grand Committee in early 2023. Additional funding will also be required in the 2023/24 budget to cover the City Plan examination costs. Officers will confirm the scope and cost of the evidence base over the summer and report back to the Sub-Committee in the autumn followed by a report to the Grand Committee.

Staff Resource implications

17. Preparation of the revised pre-submission Regulation 19 City Plan will be carried out in-house by the Development Plans Team, working alongside and supported by Development and Design colleagues in the Planning Service and by other services as appropriate. Consultant support will be required to progress a number of evidence studies and statutory assessments, with in-house staff managing the consultants' work.

Legal implications

18. There are no specific legal requirements, other than the ongoing requirement to ensure that all relevant statutory processes are complied with during production of the City Plan.

Equalities implications

19. Preparation of the City Plan has been informed by an Integrated Impact Assessment which incorporates an Equalities Assessment. Any material changes to the Plan will be subject to further Equalities Assessment.

Risk implications

20. The December 2021 report to the Grand Committee identified the risks associating with preparing a revised pre-submission Regulation 19 City Plan as compared to submitting the current version for examination. The Grand Committee agreed to revise the City Plan and officers will continue to monitor and report back on any changes to the risk assessment as the project progresses.

Climate implications

21. The City Plan is one of the key mechanisms for achieving those targets in the Climate Action Strategy which relate to the Square Mile rather than the City Corporation's own operations, in particular the net zero target for the Square Mile by 2040. It is intended that the revised City Plan will further strengthen alignment with the Climate Action Strategy.

Security implications

22. There are no direct security implications. The draft City Plan includes policies on safety and security which attracted relatively few comments at the Regulation 19 consultation.

Conclusion

23. This report provides an update on progress in reviewing the City Plan following the Regulation 19 pre-submission consultation in 2021. In December 2021, the Grand Committee considered a report on the outcomes of the consultation and agreed the key policy areas where change was required in response to the consultation, the Pandemic and to better align with other City Corporation strategies. The Committee also agreed an outline timetable for this work. In January 2022, the Local Plan Sub-Committee considered and agreed the detailed scope of work required to meet the City Plan timescales and the evidence required.

24. Officers have further refined the scope of change required as well as more specifically identifying those policy areas where further evidence gathering is required. Members are asked to consider these policy shifts and confirm that they are happy with the direction of travel indicated and the revised timetable for progressing the Plan. Alongside policy changes, the intention is that the Plan be digitally enabled, that there is meaningful consultation with all of the City's communities and that the Plan is more fully embedded into and takes account of other Corporate policies and strategies.

Background Papers

- City Plan: Update on progress and next steps: report to Planning & Transportation Committee 14/12/2021
- Local Plan – Next Steps: report to Local Plans Sub-Committee, 31/01/2022

Appendices

- Appendix A: City Plan Policy Shifts
- Appendix B: City Plan Timetable

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