

Committee(s)	Dated:
Local Plans Sub (Planning and Transportation) Committee	21/09/2022
Subject: City Plan 2040	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: Rob McNicol, Environment Department	

Summary

This report sets out potential ways that policies in the City Plan around health, inclusion and wellbeing could be amended, based on current evidence, best practice, and the responses to the consultation on the draft City Plan 2036.

The report also provides an update on the engagement plan and overall work programme for the City Plan.

Recommendation(s)

Members are asked to:

- Advise on the proposed policy direction in relation to health, inclusion and wellbeing, and the approach to engagement.

Main Report

Health, inclusion and wellbeing

1. In recent years, there has been increased awareness and evidence related to the impact of the built environment on health outcomes, wellbeing, equality and accessibility. An evidence review by Public Health England in 2017¹ found that the following contributed to a range of better health outcomes:

- Environments and infrastructure that promote walking and cycling
- High quality public transport

¹ See: <https://www.gov.uk/government/publications/spatial-planning-for-health-evidence-review>

- Provision of open and green spaces
 - Improving air quality
 - Tree planting
 - Good quality housing (including affordable housing)
2. Workplaces are increasingly seen as places that need to give high priority to the health of the people that work there, and in recent years this has been part of the draw for employees seeking good quality jobs. The covid-19 pandemic gave this added impetus, with staff and building managers seeing the benefits of good quality lighting and ventilation, and the provision of increased 'amenity' space in offices such as gyms, areas to relax, rooftop terraces, etc. More building developers and occupiers are seeking accreditation through systems such as the 'WELL' certification system.
 3. The wider city also has an important role to play in providing a healthy working environment, especially through creating and maintaining places that allow people a break from busy working lives, whether that is the traditional pubs that allow space for socialising or open spaces that provide opportunities to find quieter places, experience nature in the city, or take in views and vistas. As the climate changes, we will need to ensure that the Square Mile addresses the impacts on people's health.
 4. The built environment also has a vital role in addressing equality, inclusion and diversity. An inclusive environment, which everyone can access independently with dignity, comfort, safety and enjoyment, creates the conditions for a more diverse city. In recent years, there has been an increased emphasis on recognising the breadth of diversity and the different ways we all experience the city.
 5. While the City of London Local Plan has addressed issues of health, equality and accessibility for many years, it's important to ensure these policies are not viewed by stakeholders as having less weight in the Plan than other policies (such as those dealing with employment and office growth).
 6. In the 2015 Local Plan, for example, Policy DM10.8 Access and Inclusive Design was the last policy in the design chapter, and policies on social infrastructure and opportunities were included in the final block of policies within the Plan.
 7. For the draft City Plan 2040, the Plan retains the emphasis on considering policies as a whole, but has been revised to place health and well-being, access, inclusion and social opportunity at the heart of the Plan, forming the first block of policies, under Strategic Policy S1: Healthy and Inclusive City. This approach mirrors the focus on 'Contributing to a Flourishing Society' within the 2018-23 Corporate Plan.
 8. Policy S1 outlines a strategy for the City Corporation, working with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, education, recreation and leisure opportunities. The policy is supported

by more detailed policy guidance to be used in determining planning applications and dealing with:

- Policy HL1: Inclusive buildings and spaces – requiring buildings, open spaces and streets to meet the highest standards of accessibility and inclusive design.
- Policy HL2: Air quality – requiring the management of air quality impacts and requiring development to be Air Quality Neutral.
- Policy HL3: Noise and light pollution - requiring noise and lighting assessments to reduce the impact on the amenity of neighbours and the City.
- Policy HL4: Contaminated land and water quality – requiring developers to undertake detailed assessments to establish whether a site is contaminated and to take necessary action to remedy any contamination.
- Policy HL5: Location and protection of social and community facilities – protecting existing social and community facilities and requiring their replacement, where necessary, and encouraging new facilities to provide flexible, multi-use spaces suitable for a range of different uses.
- Policy HL6: Public toilets – requiring publicly accessible facilities in new development, including the provision of ‘changing places’ toilets.
- Policy HL7: Sport and recreation – protecting existing sports and leisure facilities, encouraging new facilities, particularly publicly accessible facilities, and encouraging meanwhile use of vacant sites, where feasible.
- Policy HL8: Play areas and facilities - protecting existing play provision and seeking additional or enhanced and inclusive play facilities or spaces, whilst avoiding locations in areas of poor air quality due to the negative health impacts on young children.
- Policy HL9: Health Impact Assessment (HIA) – requiring major development to submit a Health Impact Assessment demonstrating how the development will deliver health benefits to the City’s communities and mitigate any negative impacts.

9. Other policies in the draft Plan also address issues of health, well-being and social and economic inclusivity, particularly in relation to the detailed design of tall buildings and the design and access to the public realm. For example:

- Policy DE2: New Development – requires the design of new buildings to be inclusive and accessible to all.
- Policy DE3: Public Realm – requires spaces to be accessible and inclusive meeting the needs of different users and requiring that streets and walkways remain uncluttered.
- Policy S12: Tall Buildings – requires tall buildings to provide publicly accessible spaces, including at upper levels, at no charge.
- Policies S17: Thames Policy Area, S18: Blackfriars, and S19: Pool of London – require publicly accessible spaces and public realm along the City’s riverside.

Integrated Impact Assessment

10. National planning legislation requires local plans to be subject to a Sustainability Appraisal, demonstrating how the policies in the Plan address issues of social, economic and environmental sustainability. The SA process is intended to be an

iterative one, with assessment carried out as the plan policies are developed. Policies should then be amended to mitigate and remove, as far as possible, any adverse impacts. The SA is published at each consultation stage, on submission for examination and on adoption.

11. Within the City of London, the SA on the draft City Plan has been combined with an Equalities Impact Assessment and a Health Impact Assessment, to form a wider Integrated Impact Assessment (IIA). This has enabled the plan as a whole and its individual policies to be assessed and refined throughout the plan drafting process and in response to consultation comments. The table below summaries the social, health and inclusivity elements of the IIA for City Plan 2040, identifying how the Plan has addressed these issues. The summary highlights that key issues of inclusivity and equality have been at the heart of the Plan and resulted in a set of planning policies that promote and support the needs of all of the City's communities.

3) Safe environment and crime reduction	Some City Plan 2036 policies aimed at providing a livelier environment in the City could potentially increase anti-social behaviour, but increased vibrancy provides passive surveillance against low level crime. The policy on tall buildings applies the Civil Aviation Authority's maximum height limit for the safety of international flights.	The City Plan 2036 will provide the spatial implementation of actions in the City of London Policing Plan and the safer City Partnership strategic plan. This is strengthened by the Mayor's Police and Crime Plan and national anti-terrorism programmes. The London Plan strategic aim of "building strong and inclusive communities" further supports the City's objective of reducing crime and antisocial behaviour, managing and responding to the security challenges that the City faces.
12) Social and cultural facilities	Assessment shows mainly positive impacts from the City Plan 2036 on social and cultural facilities with provision of shared services and facilities benefiting neighbouring areas as well as the City.	The City's aspiration to develop a world-class cultural destination centred around the Barbican Centre and Smithfield is recognised in the London Plan and the Mayor's CAZ SPG and supported by the Mayor's Culture and Night-time Economy SPG. This aspiration coupled with the protection of existing facilities will help to provide suitable social and cultural facilities for all the City's communities.
13) Health	The City Plan 2036 as a whole takes a positive pro-active approach to health which is reflected in the assessment.	The City of London Joint Health and Wellbeing Strategy's aim of creating a healthy urban environment aligns with the City

	This is reinforced by the findings of the Health Impact Assessment scoping exercise at Annex 1.	Plan 2036 which places a greater emphasis on healthy streets, healthy lifestyles and healthy places. The London Health Inequalities Strategy reinforces this need for healthy places all of which will help to achieve the IIA objective of improving the health of the City's resident, worker and student populations.
14) Education	The assessment of the City Plan 2036 has not identified any negative impacts on education.	The City's policy of joint provision of schools relies on neighbouring boroughs' Local Plans for allocation of suitable sites and in turn supports the development of facilities such as Academies in neighbouring boroughs. In enabling provision of student accommodation for central London Universities, the City Plan 2036 supports opportunities for education and training.
15) Equality and inclusion	No negative impacts from the City Plan 2036 were identified through the Equalities Impact Assessment screening therefore a full Equalities Impact Assessment will not be necessary. The Key Areas of Change for Aldgate, Tower and Portsoken and Smithfield & Barbican (Culture Mile) policies support a positive approach to training, skills, education employment and cultural enrichment for all. Planning contributions are secured for training and skills to encourage local employment from disadvantaged communities close to the City.	The Mayor's Equality Diversity and Inclusion Strategy provides a framework for addressing these topics and the London Plan aim of building strong and inclusive communities supports this.

Public consultation comments on the draft City Plan

12. The enhanced focus on access, social and economic inclusion and social opportunity was broadly supported through the public consultation on the City Plan during early 2021. Overall, there were 51 representations on the Healthy

and Inclusive City policies in the Plan, with a number of suggested areas for refinement and improvement.

13. Key issues where policy changes were suggested include:
 - Including more guidance on managing the improvement of health outcomes, for example specifically addressing the need for GP services, diagnostic centres, social care facilities and mental health provision.
 - Increased weight for relevant policies
 - More emphasis on light spillage and reducing the lighting impacts of new buildings
 - A greater focus on air quality, including through zero emission zones
 - Greater attention to physical mobility and sports and leisure provision – and the provision of new opportunities within buildings and the public realm – including the provision of an up-to-date evidence base on the need for indoor and outdoor sports facilities
14. It is important to note, that the development industry, whilst supportive of the efforts to deliver improvements to health and wellbeing and inclusive access, were also concerned that policy should not be too prescriptive, allowing for some flexibility, e.g. to allow for the loss of some facilities where that loss can lead to enhanced provision elsewhere and more flexibility in the interpretation of air quality policies with Impact Assessments required only on major development schemes (over 1,000 sqm).

Design of Buildings and Spaces

15. Much of the comment on the design of buildings and spaces within the public realm came from the development industry. In general, there was support for a number of aspects of the Plan, including provision on publicly accessible spaces within buildings and the provision of new publicly accessible spaces, but a concern that policy should not be too prescriptive. The requirements for access and inclusion should be applied on a case-by-case basis, allowing for specific local circumstances such as location, impact on neighbours, design and viability to be taken into account.
16. Outside of the development industry, there was support for greater public access and for spaces and heritage to be brought to more diverse audiences in a way that is socially and economically inclusive.

Proposed Changes to City Plan 2040

17. There has been a broad level of support for the City Plan's policies on health, inclusion and well-being. While officers do not consider that major changes to policies are required, there is an opportunity to refine and enhance the policy approach and more fully embed health, inclusion and well-being throughout the Plan.
18. In the context of the City's post-Covid recovery and the desirability of widening its appeal to visitors, as well as the diversity of its workforce, officers consider that there is scope to further strengthen the policy approach particularly in relation to social and economic inclusivity, as follows:

- To embed a firmer requirement in policy on the need for development to deliver inclusive environments across the City.
- Recognising the wide diversity of people that come to the City and call it home, and ensuring that as the Square Mile changes it increasingly reflects all of our needs.
- Ensuring that the design of buildings and public spaces meet the needs of people with sensory and other non-physical disabilities as well as people who are neurodiverse.
- Consider strengthening the requirement for new development to deliver healthy working environments, for example through an accreditation system such as the WELL building standard.
- Strengthen the encouragement for sensory elements in the public realm and the provision of open spaces which address the needs of the wider community including the needs of older people, children and those with disabilities.
- Provide a framework for ensuring the City becomes more child-friendly and welcoming to families, with an emphasis on providing play space, infrastructure, open spaces and facilities in appropriate parts of the Square Mile.
- Give greater emphasis to both noise and light pollution.
- Giving greater encouragement and protection to social and community facilities.
- Enhance policy requires for sports and leisure provision as a key element in delivering a healthy city and in attracting people to the City.
- Enhancing policy to deliver a more child-friendly City, including delivering new publicly accessible play spaces and requiring appropriate developer contribution.
- Considering a new policy requiring development to be supported by an Equality Impact Assessment alongside the Health Impact Assessment.
- Adding a specific policy requiring developers to address suicide prevention and ensure that this is integral to the design of new buildings and spaces.
- Consider a new policy that seeks to ensure development has addressed community safety and security, particularly the safety of women and girls, and requiring large scale schemes to submit a Community Safety Impact Statement.
- Incorporating community safety as a key part of the Integrated Impact Assessment alongside social, economic and environmental considerations and health impacts.
- Strengthening policy to require new publicly accessible spaces to be fully inclusive and accessible to all, with a specific focus on areas of current deficiency such as the City Cluster and the City's riverside and setting out the need for development in these areas to tackle these deficiencies.

City Plan engagement

19. In order to support more comprehensive and meaningful engagement on the City Plan, an engagement plan has been developed, setting out the key steps for engaging on the City Plan as well as the Statement of Community Involvement

and a complementary Developer Engagement Guidance document (which are due to come to the Planning and Transportation Committee in October).

20. The engagement plan sets out a month-by-month overview of meetings and workshops with residents, City workers, and other key stakeholders. Initial meetings will explore how stakeholders want to be engaged and involved, what works for them, and how we can identify and get more responses from wider groups.
21. Alongside in-person engagement, the engagement plan includes a quarterly newsletter on the City Plan and other documents, and we are in the process of procuring an online engagement platform that will significantly improve the online presence of the planning directorate.
22. Officers are also undertaking a comprehensive stakeholder mapping exercise, to ensure that we have a detailed understanding of who all of our stakeholders are and how we can best contact them. The existing consultation database, which contains nearly 500 groups and individuals, will be reviewed.
23. Officers are also exploring the potential to use a consultancy to assist with engagement on the Plan. This is becoming increasingly common for complex planning projects (such as the Mayor of London’s Planning for London Programme, which is laying the groundwork for a future London Plan). Doing this would assist in embedding best practice in engagement and support officers to engage with stakeholders while also undertaking a substantial amount of evidence work and delivering the Plan.

City Plan work programme update

24. There are a number of key evidence documents being produced to support the City Plan as well as evidence that other organisations are publishing. These evidence documents will inform policy approaches in the revised City Plan 2040.

Evidence	Overview	Status
GLA employment projections	Sets out borough-level employment projections over the long term	Awaiting publication – due to be released September 2022
Future of offices in the CAZ (Arup, for Central London Forward)	Evidence looking at future demand for offices across the Central Activities Zone under different scenarios	Due to be published in October 2022
Office demand, workspaces and SMEs study	Research into future office demand in the City, including different ‘grades’ of office space, typologies of workspaces and types of business occupier	Scoping stage

Call for sites	Requesting landowners to put forward potential sites for the development of housing	Call for sites concluded; detailed discussions with landowners underway
Housing requirements	A paper setting out the City's housing requirements and capacity (based on call for sites)	Scoping stage
Hotel demand study	Evidence of future demand for hotels in the City	Procurement stage
Characterisation assessments	Characterisation assessments of the City's neighbourhoods	Work underway
Tall buildings areas	Identification of areas suitable for tall buildings, based on characterisation assessments and townscape/skyline analysis	Work underway
Integrated impact assessment	Considers the impact of the City Plan on a range of measures related to equality, sustainability, protected habitats, and safety.	Procurement stage
City Plan viability assessment	Considers the viability of development, taking into account the policy requirements in the plan	Scoping stage

Future Local Plan sub-committee meetings

25. The following table sets out the agenda items for future Local Plan sub-committee meetings:

Meeting date	Subject
18 October 2022	<ul style="list-style-type: none"> • Destination City • Retail, leisure and experiences
16 November 2022	<ul style="list-style-type: none"> • Reinventing public realm • Large development and place-making • Sustainable servicing
7 December 2022	<ul style="list-style-type: none"> • Workspace and SMEs • Office demand
January 2023 (date TBC)	<ul style="list-style-type: none"> • Zero Carbon City by 2040 • Heritage and tall buildings • Housing

February 2023 (date TBC)	• Draft City Plan 2040
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City Plan timetable

26. The following table sets out an overview of the timetable for the City Plan:

		City Plan 2040					SCI & engagement guidance	
Year	Month	Policy	Examination	Engagement	Committees	Evidence		
2022	Jul					Evidence updates		
2022	Aug							
2022	Sep	City plan redrafting		Stakeholder engagement				
2022	Oct							
2022	Nov							Formal consultation
2022	Dec							Review responses
2023	Jan							
2023	Feb							
2023	Mar				Planning & Transportation		Redraft	
2023	Apr				Policy & Resources			
2023	May				Court of Common Council		P&T committee	
2023	Jun			Formal (reg 19) consultation			Publish	
2023	Jul			Analyse comments				
2023	Sep	Consider modifications						
2023	Oct		Submit Reg 19 Plan for examination					
2023	Nov							
2023	Dec							
2024	Jan							
2024	Feb		Public examination hearings					
2024	Mar							
2024	Apr							
2024	May							
2024	Jun		Receive inspector's report					
2024	Jul	Make final modifications						
2024	Aug							
2024	Sep				Planning & Transportation			
2024	Oct				Policy & Resources			

					Court of Common Council		
2024	Nov						
2024	Dec	Adoption of City Plan 2040					

Corporate & Strategic Implications

27. 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

28. 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 spring 2023. Additional funding will also be required in the 2023/24 budget to cover the City Plan examination costs, which are likely to be substantial given the possible length and importance of the examination. Officers are currently examining the detailed costs for these projects and will report to the sub-committee in October with a further update.

Staff Resource implications

29. 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

30. 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

31. 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

32. 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

33. 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

34. 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

35. This report sets out potential policy approaches to health, inclusion and wellbeing, recognising the importance of addressing these issues through the planning system.

36. The report also provides updates to the City Plan timetable and approach to engagement.

Background Papers

- None

Appendices

- None

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