

9. Design

9.1 Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces. Design solutions should make effective use of limited land and contribute towards vibrancy, inclusion, wellbeing and a greener, net zero carbon City, through development that:

Sustainable design

1. Takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options;
2. Seeks opportunities to refurbish existing buildings, improving their environmental performance;
3. Minimises whole life-cycle carbon and contributes towards a net zero carbon City;
4. Delivers world class sustainable buildings that are adaptable and informed by circular economy principles and that treat materials as a resource;
5. Embeds climate resilience into design and contributes to the resilience of the Square Mile; and
6. Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial carbon emissions.

Form and Layout

7. Optimises site capacity, informed by the character of the area and its potential for growth;
8. Delivers buildings and spaces that have the right scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study;
9. Optimises pedestrian movement by maximising permeability, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys; and
10. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;

Experience

11. Provides an appropriate mix of uses that contribute to the creation of a vibrant City;
12. Places people at the heart of design, creating buildings and spaces with a strong sense of belonging;
13. Optimises microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views;
14. Delivers street level building frontages which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
15. Optimises the amount and connectivity of green infrastructure and, biodiversity and public amenity space and urban greening, and provides these in ways that are integral to the architecture and site design;
16. Delivers inclusive buildings, streets and spaces that meet the access needs of all the City's communities irrespective of background or circumstance;
17. Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter open spaces, roof terraces, cultural offers and other spaces, including in tall buildings and along the river and around City landmarks;
18. Supports health and wellbeing within the City's communities; and
19. Is informed by early and meaningful stakeholder engagement, proportionate to the scale and type of development proposed.

Quality and character

20. Delivers high quality design, which is visually interesting, well-proportioned and well-detailed and conserves and enhances the townscape character and appearance of the City, and its historic environment, and takes into account cross boundary impacts of the neighbouring boroughs;
21. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
22. Considers lighting as an integral part of the design process, ensuring that internal and external lighting provides the right light in the right place at the right time;
23. Incorporates signage of an appropriate siting, size, form, appearance and illumination within the building's architecture;
24. Incorporates necessary security and safety measures as an integral part of the design; and

25. Ensures that the building design concept is maintained from permission through to completion of a project.

Reason for the policy

- 9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings. Business occupiers are seeking buildings that are designed with high sustainability, accessibility and inclusion, and wellness credentials, and for these to be reflected in the appearance, functioning and design of buildings and their relationship to the wider context.
- 9.1.1 The built environment is a major contributor to carbon emissions. Development should not only seek to minimise emissions but also find opportunities to improve wider sustainability. Retrofitting existing buildings will in many cases result in lower whole life-cycle carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials. As our climate changes, development must play a role in helping to make the City more resilient to extreme weather conditions and the impact of changing climatic conditions.
- 9.1.2 Development has a significant role to play in enhancing the public life of the Square Mile and making it more welcoming for everyone through delivering inclusive and accessible public spaces, vibrancy, destinations, experiences and leisure opportunities as an integral part of new development.

How the policy works

- 9.1.3 The design approach to each site in the City will be unique and there is a need to consider a broad range of factors through an iterative design process. While sites won't share a singular route through the design process, this City Plan places significant importance on achieving sustainable development through a 'retrofit first' approach. An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the whole lifecycle carbon of different development approaches.
- 9.1.4 Options appraisals should also be informed by the potential for wider environmental benefits before considering the many wider design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.

9.2 Policy DE1 : Sustainable Design

1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.
2. All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach for the site.
3. Where new buildings are the most sustainable and suitable approach, they should deliver exemplar low carbon development and the highest environmental sustainability quality, driving forward best practice beyond standard approaches and contributing to wider sustainability improvements in the area.
4. Innovative design, materials, construction, and technologies should be used to deliver highest standards of environmental sustainability.
5. Applicants must ensure that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.

Circular economy design approaches

6. Development should be designed to incorporate circular economy principles throughout the life cycle of the building through:
 - Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;
 - Floorspace adaptability to maximise the lifespan of buildings;
 - Reuse, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources;
 - Designing for disassembly, reuse and recycling of deconstruction materials;
 - Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and
 - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase.

Sustainability standards

7. Proposals for major development will be required to:
 - achieve a minimum BREEAM rating of "excellent" and aim for "outstanding" against the current, relevant BREEAM criteria at the time of application, obtaining

maximum credits for the City's priorities (energy, water, materials, waste and pollution) Climate resilience credit should be achieved for the waste category;

- commit to achieving a minimum NABERS UK rating of 5 stars;
 - demonstrate that London Plan guidance on carbon emissions and air quality requirements have been met on site. In exceptional circumstances, where standards cannot be met on site, carbon offsetting will be required to account for the shortfall. This will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects;
 - retain existing buildings and structures where feasible to reduce embodied carbon emissions and waste;
 - demonstrate climate resilience in building and landscape design;
 - incorporate collective infrastructure such as heating and cooling networks, smart grids and collective renewable energy storage (for example batteries) wherever possible, to contribute to a net zero carbon, zero-waste, climate resilient City; and
 - Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments.
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Reason for the policy

9.2.0 The factors driving sustainable development are increasing, impacting both global and local businesses as well as workers, residents and visitors. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City's priorities:

- Energy, carbon emissions and air pollutants – reducing emissions and moving to a net zero-carbon city by 2040, in line with the requirements of the City Corporation's Climate Action Strategy;
- Water – reducing water use in an area of serious water stress;
- Pollution – reducing exposure to poor air quality;
- Materials – retaining embodied carbon in existing buildings and materials, and improving resource efficiency.

9.2.1 Social and environmental responsibility is high on the agenda for many City businesses and their workforce and a working environment that supports these goals is essential for the City's future.

9.2.2 The City of London Climate Action Strategy provides evidence for the trajectory to a net zero carbon City by 2040. The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen infrastructure are essential elements in the delivery of the net zero carbon City, where decarbonised electricity that does not contribute to future local levels of

pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides. Therefore, connection to these networks is expected wherever feasible. This will also reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms.

- 9.2.3 As new developments are large consumers of resources and materials, the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition. Proposals for substantial demolition and reconstruction should be fully justified on the basis of whole-life carbon impact, resource and energy use, when compared to the existing building, and must justify why redevelopment and new build is the most sustainable and suitable approach. All development should ensure the reduction, reuse or recycling of resources and materials, and minimise energy use and emissions that contribute to climate change.
- 9.2.4 The application of sustainability standards through this Plan will contribute to the achievement of the objectives of the City's Climate Action Strategy, however, guidance in the area of sustainable development is rapidly evolving and applicants should use the most up to date guidance to inform their planning proposals.
- 9.2.5 The circular economy is an alternative to the typical 'linear' way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer, waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building's life to minimise annual waste arisings.

How the policy works

- 9.2.6 The approach to retention and/or redevelopment, built form, whole life-cycle carbon and circular economy for the development should be shaped on the basis of the insights derived from the carbon options assessment. Applicants should work collaboratively through the carbon options process to establish the most sustainable and suitable approach for the site. Applicants should demonstrate that they have taken into account principles of sustainable design and that measures to improve environmental performance and mitigate and adapt to climate change have been integrated into the design.
- 9.2.7 The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are subject to this policy where proposed works constitute development.

9.2.8 Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development.

9.2.9 For major development the Sustainability Statement should include:

- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
- an energy assessment in line with the Mayor's Energy Planning Guidance.
- an options appraisal following the City Corporation's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits.
- an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
- details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.

Extensions:

- If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements.

For minor development

- Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.

Circular design approaches for EIA development

9.2.10 For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should demonstrate how circular economy principles have been incorporated into the development, fully addressing how construction, demolition and excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the

need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.

- 9.2.11 A Circular Economy Statement following the London Plan guidance should be submitted for all EIA development.

Other Major development

- 9.2.12 For all other Major development proposals, the sustainability statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.

- 9.2.13 A Circular Economy Statement following the London Plan guidance should be submitted for all Major development.

All other development

- 9.2.14 For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.

9.3 Policy DE2: Design Quality

1. Development should be of an exemplar standard of design, aesthetics and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.
2. The design of new development must ensure that:
 - The layout, form, scale, massing and appearance of schemes are appropriate in relation to their surroundings and have due regard to the scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area;
 - The site layout takes account of established and potential pedestrian desire lines enhancing pedestrian permeability;
 - Buildings and public spaces are inclusive and accessible for everyone;
 - The architecture and urban design function well, are visually attractive with high quality detailing, finishes and materials, and enrich the overall quality of the area for the long term;
 - Elevations have active, engaging and welcoming street frontages;
 - The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements;

- Innovative design approaches are used to create high quality buildings that meet high sustainability standards, and integrate well with the surroundings;
 - It is constructed using appropriate, high quality, low carbon, sustainable and durable materials;
 - It avoids unacceptable wind, loss of daylight and sunlight and thermal comfort impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
 - The proposed uses and activities are accommodated within the curtilage of the development and do not rely on use of the public realm, including the use of public highway;
 - The plant and building services equipment are fully screened from view and integrated into the design of the building such that there are no adverse impacts on amenity in surrounding areas;
 - The form, profile and appearance of the roofscape adds visual interest and complements the building.
3. Applicants will be encouraged to undertake meaningful developer-led engagement before submitting their planning application in line with the Developer Engagement Guidance;
 4. Applicants will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology. These visualisations should be used to inform pre-application and post application consultation with local communities and stakeholders.
 5. Applicants will be required to ensure the quality of the approved development is not materially diminished between permission and completion as a result of changes to the permitted to scheme.

Reason for the policy

- 9.3.0 Buildings and spaces around buildings affect us all – they are where we live, work and spend our leisure time; they shape our experiences as we spend time in them and move around them. Therefore central to delivering the right kind of growth, it is important to ensure that buildings are of high quality design;
- 9.3.1 Given the exceptional quality of the City's built environment, it's essential for new developments to capture and enhance the qualities and characteristics that make it a special place; The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are all characteristic of, and combine to produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City

has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

How the policy works

- 9.3.2 This policy expects applicants to approach the design of new buildings, extensions or modifications to existing buildings in an interesting, innovative and appropriate manner. Whilst no particular architectural style is encouraged, the expectation is that every scheme should be of the highest quality meeting the requirements set out in this policy and should be based on a sound understanding of the site and its context. A series of key characteristic features have been identified in the City's Character Areas Study, which should be applied to understand the underlying character of the different areas of the City. In assessing development proposals, careful consideration will be given to the scale, form, massing, appearance and those distinctive features that contribute to the area's unique identity and local character.
- 9.3.3 Good design is a key aspect for creating places, buildings or spaces that work well for everyone, look good, last long and can adapt to the changing needs of future generations. Making the right choices at all levels of the design process is therefore very important. The development proposals will be required to clearly articulate the design evolution from the conceptual stage to the final product. This narrative should be set out in the Design and Access Statement and should address the key design aspects outlined in the National Design Guidance:
- the layout
 - the form
 - the scale of buildings
 - their appearance
 - landscape
 - materials
 - their detailing
- 9.3.4 Wind conditions and solar glare may have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions, thermal comfort and solar glare. Any adverse impacts should be minimised and unavoidable impacts will need to be mitigated. Appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published guidelines for developers on wind microclimate studies required to support planning applications. Further guidance is available on solar glare, solar convergence and daylight and sunlight impacts of development.
- 9.3.5 The design and implementation of building extensions and alterations, such as entrances and windows, are important because they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated into the design of the building.

Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.

- 9.3.6 In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Blank frontages and ventilation louvres should be avoided. Ventilation louvres, where necessary, should be located away from busy streets.
- 9.3.7 Plant should be located below ground. Where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.
- 9.3.8 Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas.

Ventilation or extraction systems should be routed internally, and extensive or unsightly external ducting will not normally be permitted. Provision must be made within the building for services and ducting to and from all uses. Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, developers and/or occupiers should investigate the potential to vent emissions to the roof. Developers should provide suitable rooftop ventilation, where appropriate. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways.

9.4 Policy DE3: Public Realm

The City Corporation will work in partnership with developers, Transport for London and Business Improvement Districts (BIDs), and other key stakeholders to design and implement schemes for the enhancement of streets and spaces and the creation of new spaces including public squares, parks, open spaces, viewing galleries, rooftops, forecourts, streets, courts, alleyways, routes and spaces between buildings.

Public Realm Design

Public realm schemes, must have regard to:

1. The need to provide high quality, inclusive, welcoming, well designed, safe, and functional public realm that takes into account how people will use the space;
2. The wellbeing of users ensuring appropriate shade and shelter, provision of areas with access to direct sunlight and taking into consideration microclimatic conditions including temperature, wind, exposure to noise, air pollution to create places that encourage people to dwell and spend time;
3. The predominant use and function of the space and adjacent spaces;
4. The use of sustainable natural and high quality materials, avoiding an excessive range whilst harmonising the proposals with the surroundings and the materials used throughout the City;
5. The need to increase the provision of green infrastructure, including tree planting, urban greening, soft landscaping and the delivery of net gains in biodiversity, and to link up existing habitats, green spaces and routes to provide green corridors;
6. The City's heritage, identifying, and retaining, and better revealing features that contribute positively to the character, cultural and leisure experience and appearance of the City;
7. The need to integrate high quality public art as part of the public realm design;
8. The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate rainwater management;
9. The need to improve pedestrian amenity, ensuring that streets and walkways remain uncluttered and encourage walking, cycling and wheeling;
10. The promotion of active travel, delivering interventions which improve the design of streets and spaces for pedestrians and cyclists in line with the Healthy Streets Approach;
11. The sensitive co-ordination of lighting with the overall design of the scheme;
12. The need to provide public amenities including seating and free water drinking fountains.

Inclusive and Accessible Public Realm

The public realm should be welcoming, inclusive and accessible to all; it should be free to use and access.

Development proposals should:

1. Provide inclusive and accessible public realm that meets the existing and future needs of all user groups;
2. Ensure public spaces are open, welcoming, inclusive, free to use, and fully publicly accessible and that appropriate management and operational arrangements are in place. Where the development creates new public realm or affects the use of existing public realm, it should be ensured that public access to

the space is maximised and the rules governing the space are minimised to those required for its safe management, in accordance with the Mayor's Public London Charter. A Management Plan should be provided setting out how the space will be used and managed at different times of the day and different days of the week.

3. Ensure public spaces are free to use and access and align with the principles contained in the Mayor's Public London Charter; any restrictions to public access will only be allowed in exceptional circumstances, subject to a legal agreement and should be the minimum necessary, appropriate and reasonable.

Reason for the policy

- 9.4.0 The City of London is a dense urban environment, with a limited amount of public realm. Most streets and public spaces accommodate a high level of pedestrian footfall and perform a variety of functions above and beyond accommodating the movement of people. The City's streets and public spaces are where public life takes place, where workers, residents and visitors experience the City as a whole. Given the limited amount of space available at ground floor level in the City, public realm proposals must make effective use of the limited land resource and be of the highest design quality, maximising benefits for the public.
- 9.4.1 To attract a greater and more diverse range of people to the city at different times of the day and on different days of the week, the design of the public realm must cater for a wide variety of requirements. The management and curation of the public realm influences how it is used and its appeals to different user groups. Management and maintenance of public space should be limited to minimise rules governing public spaces to avoid management regimes being implemented that set unnecessary rules for how people should behave. Whether publicly or privately owned, public realm should be open, free to use, welcoming and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are essential for safe management of the space.
- 9.4.2 High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

How the policy works

- 9.4.3 The City Corporation will actively promote schemes for the enhancement of the public realm in accordance with the Healthy Streets Approach, the Mayor's Public London Charter, the Mayor of London's Streetscape Guidance, the City

of London Public Realm SPD, the City of London Public Realm Toolkit, the City of London Transport Strategy and the Climate Action Strategy.

- 9.4.4 Developers will be required to demonstrate that public realm enhancements will improve the function and appearance of the space. An assessment will be required to demonstrate how the development will function in terms of the use of the public space, pedestrian desire lines, and potential congestion or conflict, and what public realm enhancements will be required to deliver a functional, inclusive, accessible, safe and attractive public space.
- 9.4.5 Public realm design should follow best practice place-making principles, by creating site layouts that positively respond to the context and microclimatic conditions, and using materials that harmonise spaces. Development proposals that deliver new or improved high quality public space will be encouraged and the provision of outdoor public space at ground level will be prioritised. There will be a particular focus on creating new routes and spaces that link the public realm network, connect key destinations in the City, and provide attractive walking and cycling routes and public spaces. These spaces should encourage people to dwell and spend time, and provide amenity for people's health and well-being.
- 9.4.6 The provision of tree planting will be encouraged to improve climate resilience, provide shade and visual amenity. It should be ensured that tree planting is feasible with below ground constraints.
- 9.4.7 A draft public realm management plan must be provided at the pre-application stage, outlining how the public realm will be designed and managed in accordance with the London Plan and the Public London Charter principles. Public realm management plans will be secured through s106 agreements. These plans should ensure that the design, and management regime that govern public spaces maximises public accessibility and supports the requirements of this policy. It should demonstrate how the public space will operate and be managed at different times of the day, and at different times of the week.
- 9.4.8 Through site analysis and public engagement, developers should identify existing uses and users of public space and develop proposals that support and encourage the existing and future use of the space, while seeking to ensure public spaces are inclusive and accessible for all.
- 9.4.9 Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, the Mayor of London's Streetscape Guidance and the Public London Charter.
- 9.4.10 The City Corporation will undertake public realm enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the

Community Infrastructure Levy and funding from external sources to deliver enhancement works.

9.5 Policy DE5: Terraces and Elevated Public Spaces

1. Roof terraces will be encouraged where:

- The roof terrace is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;
- There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;
- Historic or locally distinctive roof forms, features or structures can be retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace optimises the potential for urban greening;
- Emissions from combustion plant will not affect users of the terrace.

2. Where roof terraces and elevated public spaces are proposed, safety and security risks must be addressed at the design stage and space for security checks and any hostile vehicle mitigation incorporated into the development, where required.

3. Requiring all tall buildings or major developments to provide free to enter, publicly accessible elevated spaces, which may include roof gardens, terraces, public viewing galleries, or other retail or leisure facilities to create attractive destinations for people to enjoy the City's spectacular skyline and views.

Reason for the policy

9.5.0 Roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

How the policy works

9.5.1 The City Corporation encourages proposals for roof gardens and terraces where they are sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive and where they do not impact adversely on residential amenity. There should be no impact on strategic or locally protected views.

- 9.5.2 Where roof terraces and gardens are publicly accessible, entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Security implications should be considered at the design stage of the development, including making provision for security checks within the development and hostile vehicle mitigation, where required. Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels or result in unacceptable light spillage in areas with residents or other sensitive uses. Appropriate safety features should be included to reduce the potential for suicide or falling from buildings. The City Corporation has adopted guidelines to advise developers on best practice to reduce the potential for suicides from tall buildings. The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.
- 9.5.3 Public access to tall buildings within the City is important in creating an inclusive city. Tall buildings should provide publicly accessible, step-free areas that are free to enter and inclusively designed. These may include public viewing galleries at upper levels or other forms of open space provision and may provide retail, leisure or educational facilities to enhance their attraction, where this would not undermine the inclusivity of the space.

9.6 Policy DE6: Shopfronts

Shopfronts should be of a high standard of design and appearance **to create an** attractive and welcoming retail and leisure experience on City streets. Inappropriate designs and alterations will be resisted. Shopfront proposals should:

1. Help to create active frontages, designed in ways that facilitate the visual and physical permeability of the building;
2. Respect the quality and architectural contribution of any existing shopfront;
3. Maintain the relationship between the shopfront, any fascia, the building and its context;
4. Use materials which are sympathetic to the wider context and are of high quality;
5. Ensure that signage is in appropriate locations and in proportion to the shopfront;
6. Take into account the impact of louvres, plant and access to refuse storage;
7. Consider the potential to use awnings and canopies to provide shade and mitigate against adverse climate impacts. Where they are provided, they should not harm the appearance of the shopfront, obstruct architectural features or views and should be in compliance with highway requirements;
8. Avoid external shutters and contain alternative security measures, where required;
9. Avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
10. Ensure that the design is inclusive incorporating level entrances and adequate door widths; and

11. Ensure that internal shop lighting does not create inappropriate light spillage into the public realm.
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Reason for the policy

- 9.6.0 Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.
- 9.6.1 Existing shopfronts should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

How the policy works

- 9.6.2 New shopfront proposals should relate to the upper floors of the building and surrounding buildings, providing consistency with neighbouring premises, where appropriate. New shopfronts should utilise high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth) that are out of proportion or scale with the shopfront or have a detrimental visual effect on the building or the street scene.
- 9.6.3 Modification to shopfronts and shopfront designs to incorporate louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building where they cannot be accommodated in less sensitive elevations. The use of awnings and canopies should be considered to address climate impacts, where appropriate, and should be integrated into the shopfront design in relation to size, location and materials.
- 9.6.4 Fully openable shopfronts and large serving openings may be refused where they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.
- 9.6.5 Required security measures should be internal to limit their visual impact on shopfronts and deliver an active frontage. External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts. Internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.

Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all. Where alterations would have an impact on heritage assets, all feasible options should be explored to provide the highest levels of inclusion.

9.7 Policy DE7: Advertisements

1. Advertising must be of a high standard of design, restrained in amount and in keeping with the character of the City.
2. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted.
3. Advertising flags and banners may be appropriate to support cultural institutions.
4. High quality temporary advertising associated with one-off events may be appropriate, where it would contribute to the vibrancy of the Square Mile and make a positive contribution to amenity and public safety.

Reason for the policy

- 9.7.0 To protect and enhance the character of the City's streets, the City Corporation considers that advertising material should be restrained in quantity and form. Poor quality advertisements harm the street scene and the unique character of the City of London. The City Corporation will exercise advertisement control having regard to visual amenity and public safety and will seek improvements to the design of advertisements, where necessary.

How the policy works

- 9.7.1 Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the character of the City. The display of advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however, provide an opportunity to add interest to the street scene by including images and information about the development under construction. Further guidance is contained in the City Corporation's Hoardings Advice Note.
- 9.7.2 The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.

- 9.7.3 Particular care will be necessary with advertisements on or in the setting of listed buildings and within conservation areas. Internal illumination of advertisements in such areas will not normally be permitted.
- 9.7.4 Advertisements above ground level are frequently detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features and the City's streetscape and skyline. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 9.7.5 Appropriate action will be taken to have unauthorised advertisements removed. The City Corporation's Transport Strategy requires that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

9.8 Policy DE8: Daylight and sunlight

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.
 2. Development proposals should have regard to the daylight and sunlight levels of historic interiors and should seek opportunities to improve daylight and sunlight levels where this would be achievable and appropriate.
 3. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.
 4. Development should incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and public realm.
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Reason for the policy

- 9.8.0 The City is an urban centre with a very high density of buildings, resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents. Daylight and sunlight can enhance historic interiors, particularly those that have a cultural or community function including religious buildings.

How the policy works

- 9.8.1 The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Given the importance of the City's open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. Developers will be required to submit daylight and sunlight assessments and undertake radiance studies in support of their proposals. The City Corporation may require independent verification of these assessments at the developer's expense.
- 9.8.2 When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. The City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site as well as the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. The City Corporation will publish further guidance for City developers on how it expects BRE guidance to be used and interpreted, including guidance on the use of methodologies such as radiance studies to enable better understanding of daylight and sunlight impacts to a range of existing land uses.
- 9.8.3 Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered beneficial in the public interest and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

9.9 Policy DE9: Lighting

1. Development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, relevant open spaces and community uses. The design of lighting should be informed by the potential impacts on biodiversity, and should seek to make the City a safer and more welcoming place to be for all its communities after dark.
2. The external lighting of buildings should contribute positively to the unique character and – where relevant – grandeur of the City townscape by night.
3. External lighting of heritage assets within the City must be sympathetic to the building and the wider context in terms of tone and brightness.

4. Applications for major development and for lighting schemes should follow the submission requirements set out in the Lighting SPD (Lighting Strategy, Lighting Concept and Technical Lighting Design). All other applications should address how lighting has been considered as part of the submission.
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Reason for the policy

- 9.9.0 The City Corporation aims to improve the night-time offering and create an after-dark street experience that befits a world class business and cultural centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.
- 9.9.1 Development has the potential to positively or adversely affect the level and quality of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, accessibility, safety, security as well as the reduction of energy use and light pollution.
- 9.9.2 Sensitively designed lighting schemes can improve accessibility for disabled people by reducing glare and excessive contrast. Well-designed lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light pollution, which can impact residential amenity, undermine biodiversity and cause harm to wildlife. Impacts on the City's open spaces – including the riverfront – are important considerations.

How the policy works

- 9.9.3 The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it enhances the overall experience of this unique area, and provides orientation and wayfinding after dark.
- 9.9.4 The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity, tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting of historic buildings and limit adverse effects upon adjacent areas, uses and biodiversity.
- 9.9.5 The design of lighting schemes should be considered at an early stage in the development design process, having regard to the City of London Lighting SPD. For major applications and lighting schemes, Developers should submit a Lighting Strategy at pre-application stage, a Lighting Concept with their planning application, and Technical Lighting Design details through condition if the application is approved. All other applications should consider the lighting impacts as part of the application.

9.9.6 Owners, occupiers and managers of existing buildings will be encouraged to adopt the principles set out in the Lighting SPD by signing up to the 'Considerate Lighting Charter' in the SPD.

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10. Transport

10.1 Strategic Policy S9: Transport and Servicing

The City's transport infrastructure will be maintained and improved by:

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused.
 2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
 3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations and river piers.
 4. Minimising road danger and congestion, and reducing vehicle emissions by:
 - Not providing any additional on-street car and motorcycle parking;
 - Identifying opportunities to use on-street parking reductions and restrictions to discourage private vehicle use;
 - Designing and managing streets in accordance with the City of London street hierarchy;
 - Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle;
 - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
 - Requiring the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
 - Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
 - Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, promoting best practice such as direct vision standards, and zero vision policies to minimise danger of travel and servicing, including through the use of river transport.
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Reason for the policy

- 10.1.0 The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. People walking and cycling make up more than two-thirds of all observed travel activity in the City. A third of all travel movements take place in the four peak hours: 8am to 10am and 5pm to 7pm. Over 90% of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The City is already a highly sustainable location, and the opening of the Elizabeth Line has resulted in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London to help secure improvements to public transport, for instance by safeguarding land from other forms of development where necessary.
- 10.1.1 The City's Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places.

Movement function	Proposed category
Through traffic – the preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.	London Access streets (TfL network)
Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access streets
Access – used for the first or final part of a journey, providing access to properties.	Local Access streets

Table 1: City of London street hierarchy

- 10.1.2 The TfL network (classified as London Access) is expected to accommodate the majority of through traffic, while roads which are managed by the City Corporation are classified as either City Access or Local Access. Changes to the highway network at Bank Junction and the proposed changes to the St Paul's Gyratory are reflected in the street hierarchy.

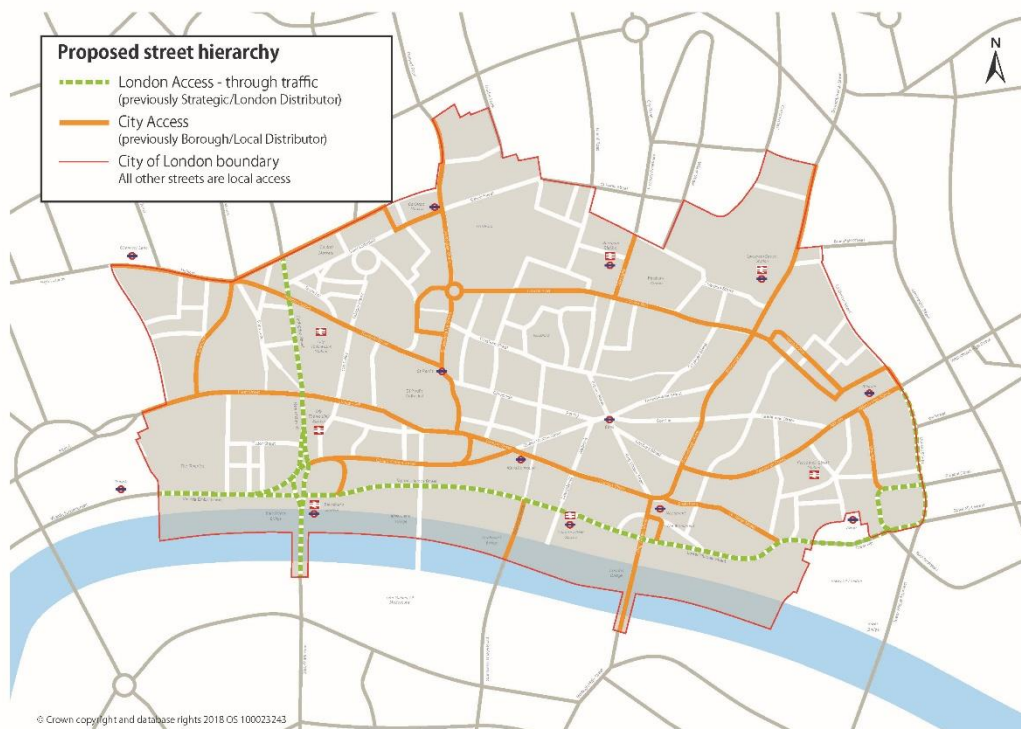


Figure 7: Proposed Street Hierarchy

How the policy works

- 10.1.3 The City's Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City's streets, with targets proposed to reduce the number of motor vehicles in the City from the 2017 baseline by at least 25% by 2030 and at least 50% by 2044. In 2022, motor vehicle traffic has already seen a 26% reduction from 185,000 vehicles in 2017 to 137,000 vehicles. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.
- 10.1.4 Achievement of the targets is dependent on measures introduced by the Mayor of London and TfL, although the City Corporation will explore specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.
- 10.1.5 The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 10.1.6 The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify

opportunities to introduce step free access as part of new developments and major refurbishments.

- 10.1.7 The City Corporation will require developers and occupiers to minimise the impact of freight and servicing trips through measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.
- 10.1.8 Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City's streets.

10.2 Policy VT1: The impacts of development on transport

1. Development proposals must have a positive impact on highway safety for all users in accordance with the Transport Strategy and Vision Zero ambition, and should not have adverse effects on the City's transport networks.
2. Where development would result in adverse impacts on the transport network, these must be demonstrated at pre-application stage and mitigated through site/building design, public highway works and management of operational activities. Appropriate measures to adapt public highway to mitigate the impact of the development will be sought via planning contributions or by legal agreement. There should be no reduction in the quality or function of the public highway as a result of development, and improvements should be sought where feasible.
3. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
4. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) are required for all developments that exceed the following thresholds:

Land Use	Thresholds
Offices	1,000m ²
Residential	10 units
Retail	1,000m ²
Hotel	10 bed spaces
Health	1,000m ²
Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m ²

5. A Construction Logistics Plans is required for all major developments or refurbishments and for any developments that would have a significant impact on the transport network during construction.

Reason for the policy

- 10.2.0 Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.
- 10.2.1 Major developments can have a significant impact on the function of existing streets and spaces and any adverse impacts must be mitigated by highway works and public realm interventions that enhance the quality of the City's streets and public spaces.

How the policy works

- 10.2.2 An assessment of the transport implications of development, during both construction and operation, should address the impacts on:
- Road danger;
 - Pedestrian environment, pedestrian and cyclist movement, infrastructure provision;
 - Public transport; and
 - The street network.
- 10.2.3 Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.
- 10.2.4 For major developments, developers must demonstrate at pre-application stage the impact of the proposed development on the streets and spaces including the increase in pedestrian, cycle and vehicular numbers. Any proposals that substantially affect the use and function of an existing street or public space will be required to mitigate the impact of their development through appropriate highways works and public realm enhancements.
- 10.2.5 For applications that meet the relevant thresholds, a robust transport assessment is required, and an initial highways design general arrangement plan (at 1:200 scale), should be submitted, highlighting the highways works that would form part of a Section 278 Agreement. As a minimum, the reconstruction/reinstatement of the streets adjacent to the planning application site should be incorporated within the proposals.
- 10.2.6 Proposals for works to the public highway should be developed in accordance with the Transport Strategy, City of London Public Realm Toolkit, the City of

London COLSAT Tool, the City's Healthy Streets Plans and other relevant guidance.

- 10.2.7 Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) should be used to demonstrate adherence to the City Corporation's Transport Strategy. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website.
- 10.2.8 A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs).

10.3 Policy VT2: Freight and Servicing

1. Applicants should consult with the City Corporation on matters relating to servicing at an early design concept stage.
2. Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites.
3. Development should be designed to provide for on-site servicing bays within buildings, wherever practicable. On site servicing areas must be of a sufficient size and design to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Servicing areas must be equipped with electric vehicle fast charging points. The use of servicing lifts will be required where this approach would be beneficial for creating attractive and inclusive public realm.
4. Delivery to and servicing of development must take place outside peak pedestrian hours (i.e. no deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries residential areas must take place outside the hours of 11pm – 7am on all days of the week. Areas of high footfall or in proximity to sensitive land uses may be subject to further restrictions, especially areas near cultural and visitor attractions and transport hubs.
5. Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by

river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.

6. Provision should be made within servicing bays for shredding operations. On-street shredding will not be permitted.

Reason for the policy

- 10.3.0 The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.
- 10.3.1 Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of consolidation, will help to minimise the number of trips required to service a development during construction and operation, as does the use of preferred suppliers or nominated carriers to serve a multi-tenanted building.
- 10.3.2 Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's Transport Strategy aims to use the planning process to require consolidation for new developments, while encouraging existing buildings and BIDs to use consolidation. Last mile logistics hubs can facilitate more deliveries on foot, by cycle and by small electric vehicles.
- 10.3.3 Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles.
- 10.3.4 In order to decrease freight vehicles in the City, the Transport Strategy aims to encourage freight into the City with rail. The City will work with Network Rail to explore opportunities for inward freight into mainline rail stations and encourages developers to support this.

10.3.5 On-street shredding operations associated with building occupation creates noise and congestion and can have an adverse impact on the amenity of neighbouring uses.

How the policy works

10.3.6 Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom should be provided of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas.

10.3.7 Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m² and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development, a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. DSPs should set out the following (as appropriate):

- The number of vehicle trips that have been avoided as a result of the use of consolidation of servicing and deliveries
- Procurement measures (including those taken jointly with other businesses) that would reduce the numbers of delivery and servicing trips
- A commitment to the use of zero emission vehicles and how their use and the use of deliveries on foot and by cycle will be facilitated
- Appropriate routing for vehicles, including to and from consolidation centres, taking account of the City's street hierarchy and addressing the potential for river and rail freight
- Proposals for monitoring delivery and servicing arrangements, including consolidation.

10.3.8 Out of hours servicing is required, except in residential areas where night-time deliveries must be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing.

10.3.9 Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP. Where appropriate, construction deliveries may be accepted outside of normal working hours and the management of such deliveries should be explained in the DSP.

10.3.10 Further information is set out in the City of London's Freight and Servicing SPD.

10.4 Policy VT3: Vehicle Parking

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
 2. No new public car parks will be permitted, including through the temporary use of vacant sites.
 3. Underutilised public car parks will be prioritised **for** alternative uses that support the delivery of the Transport Strategy. The redevelopment of existing public car parks for other land uses will be supported if it is demonstrated that they are no longer needed for a transport-related function.
 4. All off-street car parking facilities must be equipped with electric vehicle charging points.
 5. New taxi ranks will only be permitted in key locations such as near stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.
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Reason for the policy

10.4.0 The City has excellent public transport accessibility and all development should therefore be car-free (except for designated Blue Badge spaces) unless it can be demonstrated that there are exceptional circumstances which justify limited car parking, in line with London Plan standards.

How the policy works

10.4.1 Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. Any such parking should be marked out as such and restricted only for these users.

10.5 Policy VT4: River Transport

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore;

2. Improvements to piers and other river-based transport infrastructure to enable an increase in passenger and freight transport by river will be supported, alongside opportunities for new river-based transport.
 3. The City Corporation will seek the reinstatement of Swan Lane Pier for river transport uses. Development that prejudices this reinstatement will not be permitted.
 4. The permanent mooring of vessels along the riverfront will be resisted in order to maintain views of the river and heritage assets, allow public enjoyment of the riverfront and minimise potential impacts on archaeology, ecology, and amenity.
 5. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site, support improvements to Walbrook Wharf that would improve its operation, and seek opportunities for the use of the wharf for transfer of goods, where this would not undermine its safeguarded role.
 6. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.
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Reason for the policy

- 10.5.0 Walbrook Wharf is the only active river wharf in the City and needs to be retained as a waste facility and river wharf in line with the associated Ministerial Safeguarding Direction and the London Plan. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site and improve its operation, there may be potential to use Walbrook Wharf for freight logistics.
- 10.5.1 Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.
- 10.5.2 Swan Lane Pier is a redundant pier and the City Corporation will seek its reinstatement for river transport uses. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.
- 10.5.3 Given the limited opportunities to improve river transport within the City, as well as the potential impacts on views, heritage, ecology, biodiversity, archaeology, noise and other disturbance, and public enjoyment of the riverfront, permanent mooring of vessels will be resisted.

10.6 Policy VT5: Aviation Landing Facilities

Heliports will not be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

Reason for the policy

10.6.0 Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's Transport Strategy sets out principles that will apply to the potential use of drones in the City. The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.

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10.7 Strategic Policy S10: Active Travel and Healthy Streets

The City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces in ways that enhance inclusion and accessibility, put the needs of people walking and wheeling first when designing and managing our streets, and enable more people to choose to cycle in the City by:

1. Applying the Healthy Streets Approach in development proposals and improvements to public realm;
 2. Improving conditions for safe, convenient, comfortable, inclusive and accessible walking, wheeling and cycling, incorporating climate change adaptation;
 3. Expanding the cycle network across the City with the aim of ensuring that all property entrances are within 250m of the network;
 4. Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;
 5. Improving access routes and the public realm around stations, and between stations and key destinations; and
 6. Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of disabled people.
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Reason for the policy

10.7.0 The Healthy Streets Approach provides the framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.

10.7.1 Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, with over 750,000 walked and wheeled journeys a day. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost four-fold between 1999 and 2022, although the rate of growth has slowed since 2012. Pedestrian numbers have also risen in the past 10 years as the City's workforce has grown.

10.7.2 Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. The City has embedded the Healthy Streets Approach to inform strategic decision making and project prioritisation. Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles. New planning applications and public realm proposals will be assessed using the Healthy Streets Indicators to understand development impacts on surrounding streets and on people's experiences of the City's streets.

10.7.3 The Mayor’s Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking, wheeling and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk, wheel and cycle.

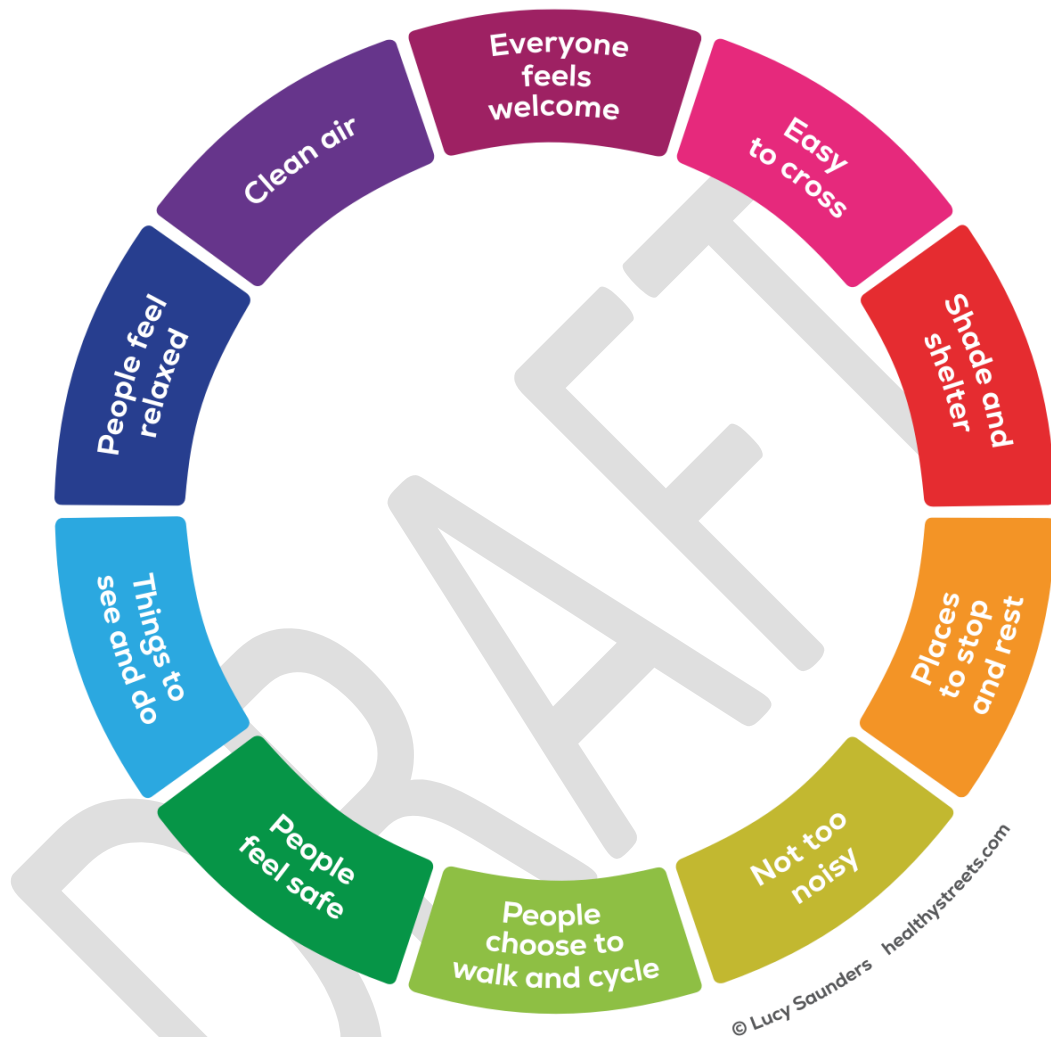


Figure 8: Mayor’s Transport Strategy Healthy Street Indicators

How the policy works

10.7.4 Through the City Corporation’s Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining appropriate levels of vehicular access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling, wheeling and walking, enhance the public realm and create new public space. Healthy Streets Plans will be

developed by the City Corporation to cover the following areas: City Cluster; Fleet Street; Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.

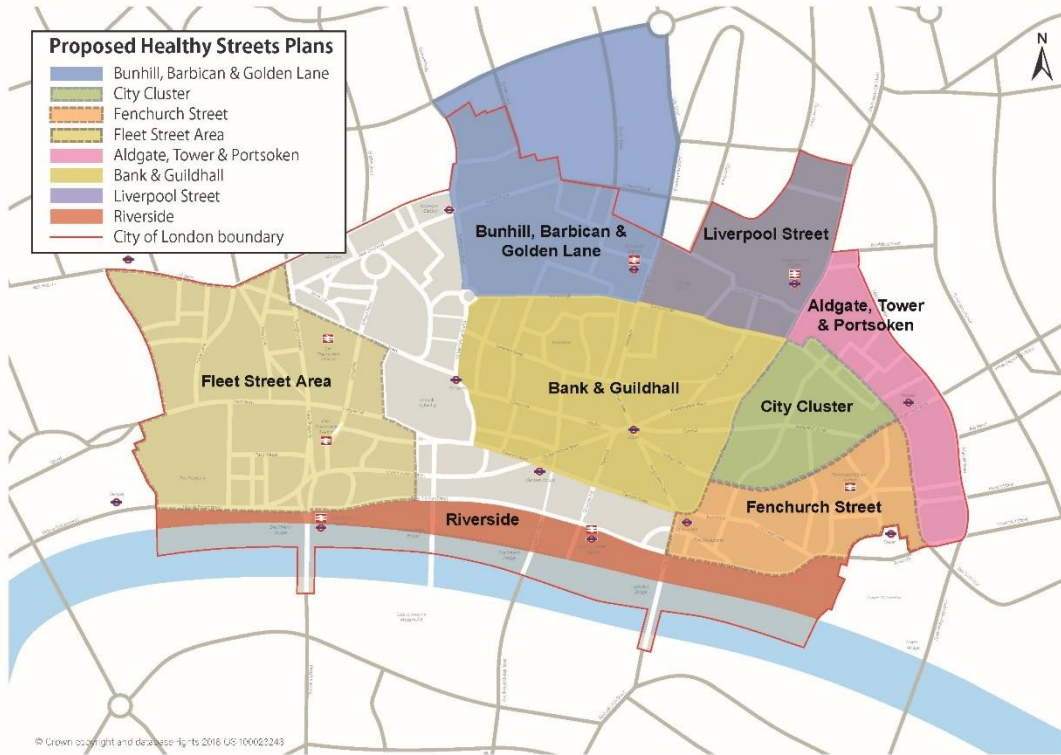


Figure 9: Proposed Healthy Street Plans

10.8 Policy AT1: Pedestrian Movement, Permeability and Wayfinding

1. Developers should facilitate pedestrian movement, enhance permeability, and reduce severance by provision of suitable routes through and around new developments, wherever feasible. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:
 - Providing legible, good quality, safe and low pollution pedestrian connections between spaces;
 - Providing new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City’s characteristic network of accessible buildings, streets, courts and alleyways;
 - Providing publicly accessible ground floors for improved pedestrian movement, where feasible;
 - Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.

2. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall. Development should not lead to the loss of routes and spaces that enhance the City's heritage, function or character.
3. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths aligned with TfL Pedestrian Comfort guidance to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians.
4. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
 5. The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 6. The shortest practicable routes between relevant points.
 7. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
 8. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable.
 9. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.
10. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.
11. Improved wayfinding will be sought through new development and public realm improvements. Improvements sought will include:
12. Opportunities to update, enhance and add to the network of Legible London signs;
13. Consistent signage for public spaces created in new development; and
14. Better revealing 'hidden' routes, courts, alleys and other spaces in ways that respect and celebrate their character and heritage.
15. Major development proposals should model the pedestrian flow impact of new development.

Reason for this policy

- 10.8.0 In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes.
- 10.8.1 The City Corporation's Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, increasing the number of pedestrianised or pedestrian priority streets from 25km to 35km by 2030 and 55km by 2044. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 10.8.2 The Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 10):

Routes north-south from:

- Millennium Bridge to Barbican via St Pauls Cathedral, which supports the new Museum of London and Smithfield area changes.
- Southwark Bridge to Barbican via Guildhall
- Cannon Street to Liverpool Street via Bank
- Blackfriars Bridge to Farringdon via Ludgate Circus (in partnership with TfL)
- London Bridge to Liverpool Street via Bishopsgate including Monument junction (in partnership with TfL); and

Routes east-west from:

- Farringdon to Aldgate via Smithfield and the Barbican
- Fleet Street to Aldgate via Bank and the City Cluster, including Ludgate Circus (in partnership with TfL).
- Temple to Tower Hill via the Thames Riverside

10.8.3 The City’s narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, wayfinding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City’s users

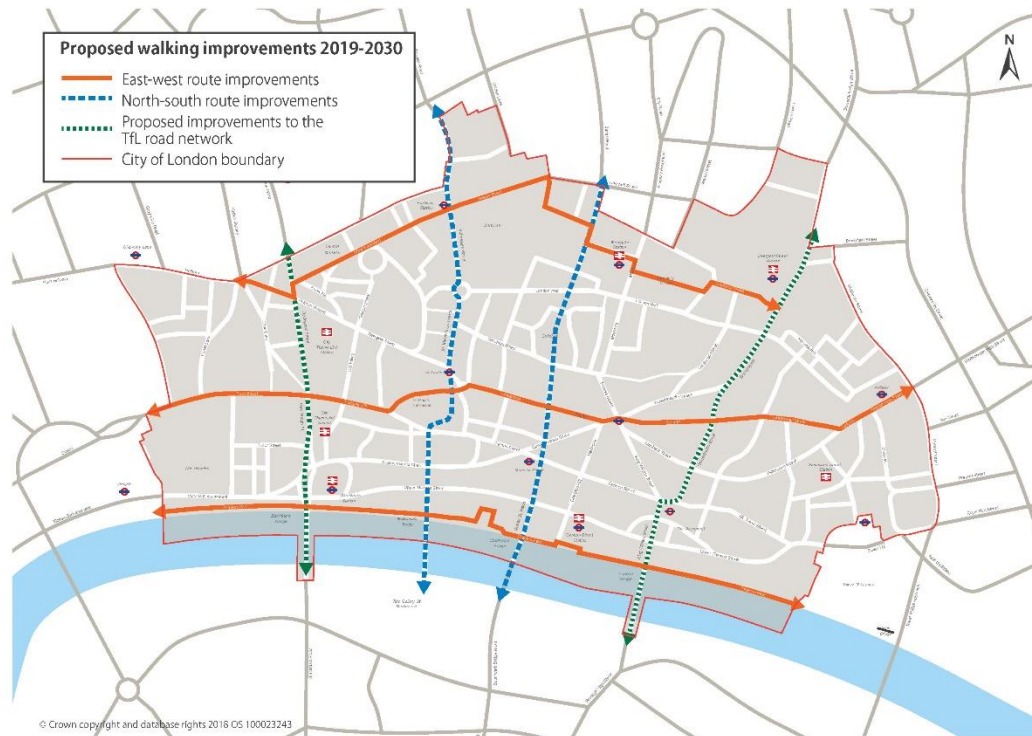


Figure 10: Proposed walking improvements (2019-2030)

How the policy works

10.8.4 In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.

10.8.5 Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. Minimum pavement widths should accord to TfL’s Pedestrian Comfort guidance. TfL’s Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City Corporation’s Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a

clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

10.8.6 Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition. Financial contributions secured through s106 planning obligations will be used to ensure development contributes to improvements in the wider public realm. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

10.9 Policy AT2: Active Travel including Cycling

All major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle by:

- ensuring suitable access between the development site and pedestrian and cycle routes;
- incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling in accordance with the London Cycling Design Standards.

Reason for this policy

10.9.0 Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.

10.9.1 A growing number of people are choosing to cycle through and around the Square Mile. The popularity of cycle hire schemes has grown post-pandemic. Increased access to the East-West and North-South Cycleways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 17). TFL cycleways and will be prioritised on this network, with the aim of delivering the core cycling network by 2035.

10.9.2 Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans. Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London's Transport Strategy, and that of the Mayor of London.

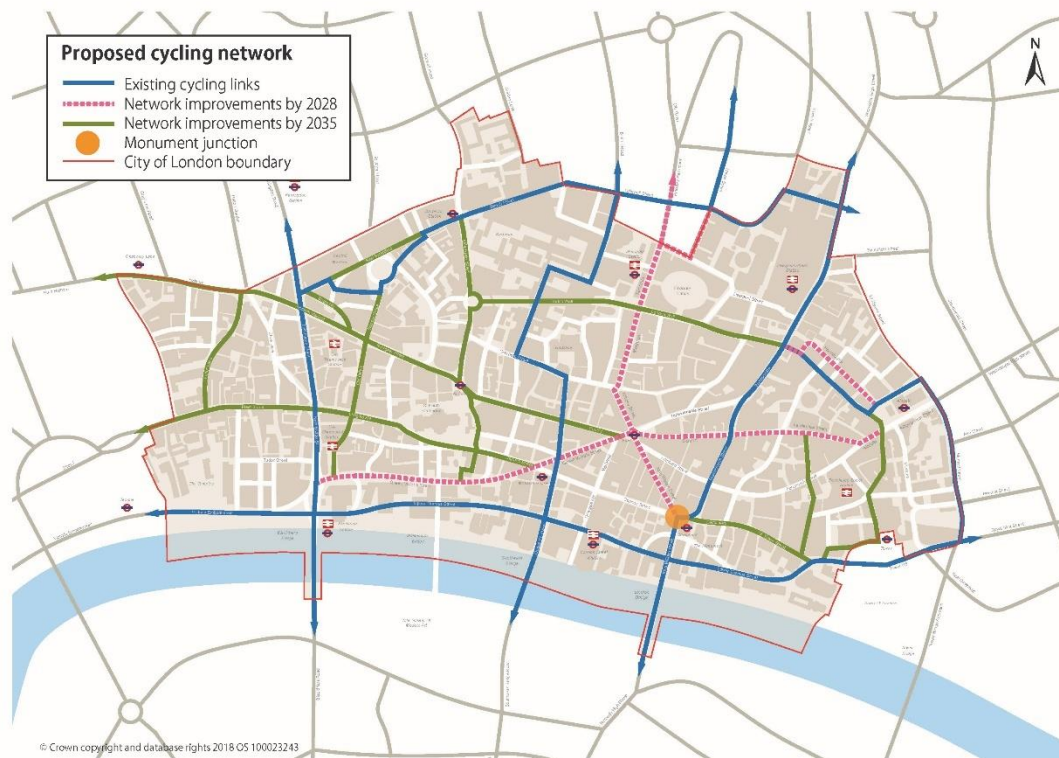


Figure 11: Proposed cycling network

How the policy works

- 10.9.3 New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces. The City of London's Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this. Accessible facilities for disabled cyclists should also be provided.
- 10.9.4 Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City's cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

10.10 Policy AT3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
 2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
 3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.
 4. Cycling facilities should be conveniently located, easily accessible, safe and secure.
 5. Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm.
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Reason for this policy

10.10.0 There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, reduce carbon emissions and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

How the policy works

10.10.1 Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. 5% of cycle parking spaces must be flexible in order to support secure storage and charging for e-bicycles, micromobility devices, and mobility scooters. A robust justification for failure to comply with London Plan standards will be required. This will be considered on a case by case basis as part of pre-application discussions. All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.

10.10.2 Short-stay visitor cycle parking should be provided on-site at ground floor level. Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible.

10.10.3 In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.

10.10.4 The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.

10.10.5 This policy applies to the cycle parking provided within new developments. The City Corporation's Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. The Transport Strategy aims to ensure that operators of dockless cycle and scooter hire schemes require users to leave cycles and scooters in designated parking locations.

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