

City Plan 2040

Changes made from the City Plan 2036 (produced March 2021) to the City Plan 2040

This document summarises the main changes made to each chapter and policy of the City Plan, comparing the version published in March 2021 for the first Regulation 19 consultation to the revised submission version, known as City Plan 2040.

Chapter 1 – Introduction

1. This chapter has been deleted from the plan. It contained background information on why a local plan is being produced, the stages the plan has been taken through, the broad policy context, and summarises the structure of the plan. Some of these are important pieces of information to retain but they do not need to be at the start of the document; they are rarely looked at in the day-to-day use of a local plan. They will be revised, summarised and contained in an appendix.

Chapter 2 – The City Today

2. This chapter has been deleted from the plan. It contained a series of infographics setting out the key stats about the Square Mile, such as the amount of jobs, residents, size of open spaces, etc. Providing a static snapshot of this information, which will date rapidly, is potentially misleading. Instead, the planning department are producing new, digital approaches to monitoring that will provide better and more meaningful data about the City, updated regularly and providing historic time series wherever possible.

Chapter 3 – Vision, Strategy and Spatial Objectives

3. This chapter has been reformatted and revised extensively. The previous version used the framing of the City Corporation's corporate plan 2018-2023, which is in the process of being replaced. For each of the three corporate plan aims, there was a vision for the Square Mile and a strategic objective. A vision was also set out for each Key Area of Change. A spatial strategy set out a series of 11 further objectives for the Plan.
4. In the refreshed version, this approach has been simplified and revised, and updated to comply with the Planning and Compulsory Purchase Act 2004 (as amended by the Neighbourhood Planning Act 2017), which requires local planning authorities to identify the strategic priorities for the development and use of land in the authority's area. A series of strategic priorities have been set out, grouped together under the three sustainable development objectives set out in the National Planning Policy Framework (NPPF). These strategic priorities have been informed by the objectives set out in the spatial strategy of the first proposed submission version of the plan, as well as other corporate strategies

such as the Transport Strategy, and (like everything in the revised Plan) have been informed by evidence and stakeholder engagement.

5. A new spatial strategy has been added. This focuses on those aspects of the plan that have a spatial dimension, such as where tall buildings should be located and where new housing will be focussed.

Policy Changes

6. Almost all policies have been amended, however many amendments are relatively minor in scope. The amendments are summarised for each policy below.

Health, Inclusion and Safety

Strategic Policy S1: Healthy and Inclusive City

7. This is a strategic policy setting out how the City and development in the Square Mile should contribute to improving health and inclusion. References have been added to enabling communities to access opportunities for employment as well as sports provision (alongside other opportunities). A requirement has been added for development to take inclusive approaches to design. These changes reflect responses received during the previous Regulation 19 consultation in 2021 and informal engagement in 2023.

Policy HL1: Inclusive buildings and spaces

8. The main changes are amendments to fully reflect all of the protected characteristics, in line with the Equality Act; a requirement for major development to submit an equality impact assessment; and a requirement for development to promote the achievement of equity, diversity and social inclusion.
9. Supporting text has been updated to reflect these changes and to highlight how inclusive design can take neurodiversity into consideration.

Policy HL2: Air quality

10. A change had been made prior to the Local Plan sub committee regarding the use of diesel generators. This has been subsequently reverted to the original approach, with supporting text amended.

Policy HL3: Noise

11. This policy previously covered both noise and light pollution. A separate design policy (DE9) covered lighting. In order to simplify the plan, and to reflect the increased emphasis on lighting as a result of the City Corporation's lighting

charter and Lighting SPD, the lighting aspects of HL3 have been merged into policy DE9.

12. The policy wording regarding noise has been clarified to distinguish between new noise-generating uses and the potential impacts of existing noise-generating uses on proposed development, with reference to the 'agent of change' principle added in relation to the latter. A requirement has been added for developers to explore opportunities to enhance the acoustic environment.

Policy HL4: Contaminated land and water quality

13. No changes have been made to the policy.

Policy HL5: Location and protection of social and community facilities

14. The policy has been amended to ensure that any replacement facilities are equivalent to those being replaced. The requirement for new facilities to not prejudice the business city has been removed from this policy, as it is adequately addressed under policy OF2.

Policy HL6: Public toilets

15. The policy has been amended to ensure facilities are provided for different types of users, including the provision of 'changing places' facilities, and the need for visible signage.

Policy HL7: Sport and recreation

16. The policy has been amended to reflect the City Corporation's aims to support a greater sport and recreation offer, and the creation of a network of facilities across the Square Mile.

Policy HL8: Play areas and facilities

17. The policy has been amended to seek additional play facilities in appropriate locations, and to ensure play facilities are designed inclusively. This issue arose during public engagement, particularly in relation to the need in and around residential areas.

Policy HL9: Health impact assessments (HIA)

18. The requirements of the policy have been tightened to ensure that all major development undertakes an HIA. Previously, this only applied to some, with

other forms able to carry out a checklist; in practice, developers are already complying with the requirement for rapid or full HIAs.

Strategic Policy S2: Safe and Secure City

19. The policy has been amended to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

Policy SA1: Publicly accessible locations

20. The name of the policy has been amended from 'crowded places', to reflect more up to date terminology.
21. to highlight safety, fear of crime, and anti-social behaviour, and the need for development to address the requirements of people who are more likely to experience lack of safety in the City.

Policy SA2: Dispersal routes

22. No substantial changes to the policy.

Policy SA3: Designing in security

23. The policy has been amended to mention 'secured by design' principles and to give further advice on how hostile vehicle mitigation should be designed.

Housing

Strategic Policy S3: Housing

24. The housing requirement for the Plan has been updated to reflect both the London Plan (up to 2029) and the requirement for housing beyond this period set out in national policy.
25. An additional clause has been added that seeks to prioritise specific forms of housing in residential areas, as these reflect the majority of the City's housing need, as identified in the Strategic Housing Market Assessment. This also responds to issues raised during consultation, where respondents living in residential parts of the City were keen to ensure residential areas and the services, amenities and character of those areas were strengthened.

Policy HS1: Location of new housing

26. The relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to support a mix of cultural and community uses in residential areas (amongst other uses), reflecting responses received during informal engagement.

Policy HS2: Loss of housing

27. The supporting text has been amended to provide guidance on those situations where amalgamation of housing units might be acceptable.

Policy HS3: Residential environment

28. Reference to the lighting policy (DE9) has been added.
29. Reference to the agent of change principle has been removed from this policy, as it isn't directly applicable and is covered more clearly elsewhere in the plan.

Policy HS4: Housing quality standards

30. The relationship of the policy to London Plan residential standards has been clarified.

Policy HS5: Short term residential letting

31. No substantive changes to the policy.

Policy HS6: Student accommodation and hostels

32. The policy has been amended to require high design and amenity standards and good connections to educational institutions. Supporting text has been amended to refer to GLA guidance on accessible accommodation, and to advise developers to liaise with local residents and businesses.

Policy HS7: The Temples

33. The policy has been moved to chapter XX (see below).

Policy HS7: Older persons housing

34. The housing target for older persons housing has been amended, in line with the requirements of the SHMA.

Policy HS8: Self and custom build housing

35. No changes to the policy.

Offices

Strategic Policy S4: Offices

36. The target for office floorspace has been amended to reflect the recent evidence in the City Corporation's future of offices study, with an aim to provide a minimum of 1.2m square metres of additional office floorspace over the lifetime of the City Plan.
37. The policy has been amended to promote the retrofitting and upgrading of existing office buildings, reflecting responses received during recent informal public engagement.

Policy OF1: Office development

38. The policy has been amended to promote retrofitting, wellbeing and circular economy design approaches, reflecting consultation responses received during public engagement. Supporting text has been updated to provide guidance on the functioning and design of office lobbies as places that can contribute to the life of the City.

Policy OF2: Protection of existing office floorspace

39. The policy has been substantially amended, to provide clarity on the situations in which the loss of office floorspace would be acceptable. The first part of the policy sets conditions that all such applications would need to meet. The second part sets out four routes for development, provided they meet the first part of the policy. These routes include the 'retrofit fast track', which was explored during public engagement. The other three routes were already set out in the previous version of the policy but have been reworded for clarity.

Policy OF3: Temporary 'meanwhile' uses

40. The policy has been amended to encourage meanwhile uses, and to require major development that would affect existing retail units to set out how they would maintain active uses in these units prior to redevelopment. This was an issue raised during public engagement.

Retail

Policy S5: Retail and active frontages

41. A clearer strategic direction to diversity and making retail areas more vibrant, including through partnership working, has been added to the policy. This reflects issues raised during public engagement, particularly in relation to areas such as the Fleet Street Principal Shopping Centre. It also responds to Destination City.
42. The 'retail links' have been removed from the plan, with greater support for the retention and encouragement of a broader range of 'active frontage' uses across the Square Mile.
43. The policy now encourages the opening of retail and other uses in the evenings and weekends, reflecting the City Corporation's Destination City vision.

Policy RE1: Principal Shopping Centres

44. No substantive changes to the policy. The wording of policy has been clarified.
45. The sections setting out the strategic approach for each of the four PSCs has been amended in response to recent evidence and public engagement.

Policy RE2: Retail links

46. This policy has been deleted, with a more consistent and clear approach to active frontage uses set out in policy RE3.

Policy RE2: Active frontages

47. This policy was previously titled 'Ground floor retail provision elsewhere in the City'. The policy has been amended to encourage a broader range of retail and related uses across the City, and to resist the loss of active frontages. This responds to the City Corporation's Destination City vision and recent evidence of retail demand.

Policy RE3: Specialist retail uses and clusters

48. This policy has been expanded in response to recent evidence of retail demand, seeking to ensure that retail provision in different parts of the City responds to its context and character.

Policy RE4: Markets

49. This policy has been amended to more positively support markets, recognising that they have the capacity to enhance existing retail areas, not simply have an adverse impact on them. This responds to an issue raised during recent informal public engagement.

Culture and visitors

Strategic Policy S6: Culture and Visitors

50. This policy has been substantially amended, in response to the City Corporations Destination City vision and the strategic priority to transform the Square Mile as a leading leisure and cultural destination.

Policy CV1: Protection of existing visitor, arts and cultural facilities

51. No substantive changes to the policy.

Policy CV2: Provision of Arts, Culture and Leisure Facilities

52. This is a new policy, reflecting the City's vision for culture and leisure in the Square Mile. It seeks to encourage new provision of arts, culture and leisure facilities by requiring on-site facilities from very large scale development and provision (either on site, off site, or through contributions) from all major development.
53. This approach will be informed by the new cultural planning framework, which will set out focal areas for cultural provision across the Square Mile.
54. This issue was discussed during the recent informal public consultation, with respondents seeking to ensure that culture and leisure facilities were inclusive and accessible for all.

Policy CV3: Provision of visitor facilities

55. No substantive changes to the policy.

Policy CV4: Hotels

56. The policy relationship between this policy and the loss of offices policy has been clarified. The policy has been amended to require provision of active uses at ground floor level in new hotel development, and to ensure hotels come

forward in suitable locations. Supporting text has been updated to reflect the hotel demand identified in recent evidence.

Policy CV5: Evening and night time economy

57. The policy has been amended to refer to the agent of change principle.

Policy CV6: Public art

58. No substantive changes to the policy. Wording has been amended to ensure inclusive terms are used in reference to disabled people.

Infrastructure

Policy S7: Infrastructure and utilities

59. This policy has been amended to refer to the importance of infrastructure in planning for a net zero City. The City Corporation's Utility Infrastructure Strategy has been referenced in supporting text.

Policy IN1: Infrastructure provision and connection

60. Minor changes have been made to policy to allow more flexible approaches to applications and to encourage innovative solutions to facilitate network connections.

Policy IN2: Infrastructure Capacity

61. No substantive changes have been made.

Policy IN3: Pipe subways

62. No substantive changes have been made.

Design

Strategic Policy S8: Design

63. This policy has been extensively revised, clarifying approaches to sustainable design, site capacity and vibrancy. Biodiversity has been added to the policy, as has consideration of health for design approaches. The need for stakeholder engagement has been highlighted.

Policy DE1: Sustainable design

64. This policy has been extensively revised, setting out the new 'retrofit first' approach and the need to follow the City Corporation's Carbon Options Guidance, an issue that was explored during the recent informal public engagement and raised during the previous Regulation 19 consultation.
65. Parts of policy CE1 (Zero waste design) that relate to circular economy design approaches have been moved into this policy, as they are more relevant in this location.

Policy DE2: Design quality

66. The policy has been amended to ensure new development provides inclusive spaces, active frontages, and greening, and the need for community engagement. Supporting text has been updated.

Policy DE3: Public realm

67. The policy has been extensively amended to reflect numerous aspects of how public realm can contribute to the built and natural environment, including green infrastructure, public art, seating, and other features. The need for inclusive and accessible public realm has been emphasised in the policy and expanded. The need for high quality public realm was identified during public consultation, particularly in relation to Key Areas of Change.
68. Supporting text has been updated in line with the refreshed policy approach.

Policy DE4: Pedestrian permeability

69. The policy has been merged with policy AT1, to avoid repetition and improve clarity. The policy has been deleted from this location.

Policy DE5: Terraces and viewing galleries

70. The functioning of policy requirements for roof terraces and viewing galleries has been strengthened, with additional reference to complementary cultural and leisure facilities to create a mixture of destinations.

Policy DE6: Shopfronts

71. Minor amendments to the policy have been made to emphasise the need to create active frontages and consider the use of awnings.

Policy DE7: Advertisements

72. Minor changes to the policy have been made to support flags and banners where appropriate for cultural institutions, and the use of advertisements associated with one-off events in the City.

Policy DE8: Daylight and sunlight

73. The policy has been amended to refer to a broader range of sensitive receptors that could be impacted by loss of daylight or sunlight, and to refer to daylight and sunlight levels in historic interiors.

Policy DE9: Lighting

74. The broad thrust of the policy remains, however it has been amended in line with the approach set out in the City Corporation's Lighting SPD and best practice.

Transport

Strategic Policy S9: Transport and servicing

75. Minor changes have been made to the policy to reflect current approaches on the restriction of on-street parking.

Policy VT1: The impacts of development on transport

76. This policy has been revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

Policy VT2: Freight and Servicing

77. Minor changes have been made to the policy, including reference to the use of servicing lifts in appropriate locations.
78. Wording in the policy has been clarified around servicing hours and sustainable deliveries.
79. revised to ensure that where development would have an impact it will mitigate this through works to the public highway (secured through s106 and/or s278 agreements, as appropriate), reflecting established practices.

Policy VT3: Vehicle servicing and parking

80. Reference to the use of under utilised car parks as last mile delivery hubs has been removed, however support for their alternative transport uses has been retained.

Policy VT4: River transport

81. This policy has been amended to give greater emphasis to river-based transport of people and freight, and to resist permanent moorings of vessels, in line with the aim to create a more inclusive, welcoming and vibrant riverfront.

Policy VT5: Aviation Landing Facilities

82. No changes have been made to this policy.

Strategic Policy S10: Active Travel and Healthy Streets

83. The policy has been amended to reflect the recently updated Transport Strategy, including placing increased emphasis on inclusion and prioritising the needs of people walking and wheeling. Explicit reference to the healthy streets approach has also been added to the policy.

Policy AT1: Pedestrian Movement, Permeability and Wayfinding

84. This policy has been amended to reflect the requirements of policy DE4, which set out closely related policy requirements.
85. An addition to the policy has been made in relation to the need to improve wayfinding through a variety of means.

Policy AT2: Active Travel including Cycling

86. A reference has been added to the London cycling design standards. Supporting text advises that accessible shower and changing facilities should be provided in appropriate new development.

Policy AT3: Cycle Parking

87. This policy has been amended to require cycle parking to be conveniently located, easily accessible, safe and secure. Supporting text has been amended

to advise that a proportion of cycle parking spaces should flexibly provide storage and charging for e-bicycles and mobility scooters.

Heritage and Tall Buildings

Policy S11: Historic Environment

88. This policy has been extensively altered. Additional emphasis has been placed on the need to celebrate the City's heritage and promote public enjoyment of historic spaces and buildings in ways that are inclusive and accessible. The policy encourages heritage-led placemaking, the retrofit of historic buildings and collaboration between heritage sites and other adjacent developments. The need to adequately protect the City's heritage was raised during both the Regulation 19 and informal public engagement, and these responses have informed the policy direction.

Policy HE1: Managing Change to the Historic Environment

89. The policy has been amended to require submission of statements of significance and heritage impact assessments. Specific wording has been added to reflect the wording of national policy in relation to heritage harm.

90. An additional requirement has been set out in policy for developments to conserve and enhance the immediate setting of Bevis Marks Synagogue and The Monument; issues relating to the former were raised extensively during the Regulation 19 consultation and flagged during the recent informal public engagement.

91. Supporting text has been extensively revised to reflect these changes and best practice in conservation.

Policy HE2: Ancient Monuments and Archaeology

92. The policy has been amended to require artefacts or deposits to be preserved in-situ.

Policy HE3: Setting of the Tower of London World Heritage Site

93. The policy has been amended to reflect requirements for heritage impact assessments, and for development in the area to contribute to pedestrian and cycle routes, including through wayfinding improvements.

Strategic Policy S12: Tall Buildings

94. The policy has been extensively amended, reflecting the approach required to comply with the London Plan and recent evidence in relation to character areas and tall building areas.
95. The first part of the policy gives a definition for tall buildings in the City. The next few sections set out design policies. The policy also sets out where tall buildings would be appropriate, and how developments should identify appropriate heights for tall buildings. Supporting text has been updated accordingly.

Strategic Policy S13: Protected Views

96. A minor amendment to the policy has been made to require development to have regard to views of the City that have been designated by other local planning authorities.
97. Extensive additions have been made to the supporting text to reflect the operation of St Paul's Heights as set out in the Protected Views SPD.

Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure

98. A minor amendment has been made to the policy to reference the green corridors that have been identified to link up the City's Sites of Importance for Nature Conservation (SINC).
99. Supporting text has been revised to more clearly set out the importance of open spaces and green infrastructure in the Square Mile.

Policy OS1: Protection and provision of open spaces

100. The broad approach in the policy remains as previously but wording has been revised to provide additional clarity and to emphasise the need for inclusive, accessible public open spaces. Supporting text has been revised to more clearly set out the importance of inclusive and welcoming open space.

Policy OS2: Urban greening

101. Minor changes have been made to the policy to emphasise the need for maintenance of green features. Supporting text has been shortened and clarified, with reference to new London Plan guidance on urban greening added.

Policy OS3: Biodiversity

102. Minor changes have been made to the policy to recognise that green walls may not be appropriate ways to increase biodiversity in all cases. The policy has been amended to ensure it supports appropriate pollinators in the City. Supporting text has been revised to reference the City Corporation's Biodiversity Action Plan.

Policy OS4: Biodiversity Net Gain

103. This is a new policy, reflecting the imminent requirement set out in legislation for development to provide net gains in biodiversity. Because of the existing low levels of biodiversity in the City, a more relevant approach seeking absolute increases (rather than a percentage uplift) has been set out in policy, supported by recent evidence.

Policy OS5: Trees

104. A minor amendment has been made to refer to the green routes that have been identified to link up the City's SINC's.

Climate Resilience

Strategic Policy S15: Climate resilience and flood risk

105. A requirement has been added for development to contribute to wider climate resilience measures. The timeline for raising flood defences has been brought forward, in line with recent evidence.

Policy CR1: Overheating and Urban Heat Island Effect

106. No amendments have been made to the policy.

Policy CR2: Flood risk

107. No amendments have been made to the policy (other than typographical changes).

Policy CR3: Sustainable Drainage Systems (SuDS)

108. No amendments have been made to the policy (other than typographical changes).

Policy CR4: Flood protection and flood defences

109. No amendments have been made to the policy. In supporting text, the timeline for raising flood defences has been brought forward, in line with recent evidence.

Circular Economy and Waste

Strategic Policy S16: Circular Economy and Waste

110. No amendments have been made to the policy (other than typographical changes). The London Plan apportionments have been updated in supporting text to most recent London Plan.

Policy CE1: Zero Waste City

111. The policy has been split and merged into policy DE1 (Sustainable Design) and policy CE2 (renumbered CE1 - Sustainable Waste Facilities and Transport).

Policy CE1: Sustainable Waste Facilities and Transport

112. No amendments have been made to the policy. Part of previous policy CE1 (Zero Waste City) and relevant supporting text have been incorporated into this policy.

Policy CE3: New waste management sites

113. A minor clarification has been made to the policy to be clear that the relevant part applies to waste facilities that generate energy from waste.

The Temples, the Thames Policy Area, and the Key Areas of Change

Policy TP1: The Temples

114. This is a new policy, replacing the previous Temples policy (HS7). It better reflects and seeks to support the functioning of the Temples as places of learning, training and collegiate facilities alongside housing and workspaces for barristers and students. The previous policy sought to retain a balance between housing and workspaces in the area; this approach no longer reflects the optimal functioning of the area as a place to support the legal profession.

115. The policy also recognises the important historic character of the Temples, encourages sensitive adaptation and accessibility improvements, and seeks opportunities to encourage improvements to the public realm and open spaces.

Strategic Policy S17: Thames Policy Area

116. The policy has been amended to emphasise the need for additional inclusive public space along the riverfront. Clarification has been given in respect of moored vessels. Supporting text has been shortened and repetition removed.

Strategic Policy S18: Blackfriars

117. The policy has been amended to support the provision of an eastern entrance to Blackfriars Station, providing access to the riverfront. Encouragement has also been given to provision of sport, leisure or recreation facilities for the area below the Blackfriars undercroft. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S19: Pool of London

118. The updated policy aims to make the most of opportunities to provide ample public open spaces along the Thames riverfront, enhance pedestrian access, and optimize the use of heritage assets, with the aim of transforming riverfront into a lively and attractive destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S20: Aldgate, Tower and Portsoken

119. The updated policy emphasises the need to deliver a more diverse mix of developments in the area and support the revitalisation of the Mansell Street Estate. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S21: City Cluster

120. This policy has been extensively amended. City Cluster has been identified as one of the areas appropriate for tall building development. The revised policy emphasises the need to transform Leadenhall Market into a vibrant destination and encourages to enhance its leisure and retail offer. The policy strengthens the requirement for providing free to enter and publicly accessible elevated spaces. Policy further emphasises the need to respect the immediate setting of Bevis Marks Synagogue. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S22: Fleet Street and Ludgate

121. The policy has been amended to identify Fleet Street as an area appropriate for tall buildings and emphasis the need to strengthen the retail provision along the principle shopping centre. It also highlights the need to diversify the offer by providing cultural and leisure facilities. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S23: Smithfield and Barbican

122. The policy has been updated to provide greater support to the provision of hotels in appropriate locations along with leisure and retail uses. In addition, it encourages the provision of spaces suitable for other complementary uses such as start-ups, creative industries and meanwhile uses. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S24: Culture Mile Implementation

123. The policy has been removed, following the wrapping up of the Culture Mile initiative.

Policy SB1: Culture Mile Impacts

124. The policy has been removed, following the wrapping up of the Culture Mile initiative. Other policies address the need to mitigate impacts of cultural, night time economy and other uses.

Strategic Policy S24: Smithfield

125. This policy has been revised to encourage the growth of the area's retail and leisure economy with a particular focus on establishing Smithfield as a leisure destination. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Strategic Policy S26: Liverpool Street Key Area of Change

126. This policy has been revised to set out area based priorities for placemaking, aiming to enhance the overall visitor experience by public realm enhancements and improving wayfinding; and connectivity to nearby local destinations. The area was discussed during the recent informal public engagement and outcomes from that session and online feedback have informed the revised policy.

Implementing the City Plan

Strategic Policy S27: Planning Contributions

127. This policy has been updated to include the requirement for securing contributions for cultural provision, highway and public realm enhancements.