

## **Planning Applications Sub Committee 13 December 2024**

### **Addendum Report for Agenda Item 3 (1 Undershaft, reference 201423LEIA)**

#### **1. NPPF (12 December 2024)**

The Government has published a new version of the National Planning Policy Framework on 12<sup>th</sup> December 2024.

This new version is valid immediately and should be applied to the determination of planning applications (where relevant) upon publication. The development plan remains the statutory basis for the determination of planning applications, although the policies within the NPPF are (where relevant) a material consideration.

The changes to the NPPF do not alter the recommendation being made by officers for the determination of this application, and officers are of the view that these changes do not substantially alter the assessment of the application against the NPPF, the weight to be given to the policies in the NPPF or the issues set out in the main report.

The new version of the NPPF can be found here: [National Planning Policy Framework](#). This addendum sets out the main changes and updates to Agenda item 3 in relation changes to the wording of the NPPF.

Officers will provide members with a full briefing on the new NPPF at the January 2025 Planning and Transportation Committee.

The primary amendments that are most relevant to the determination of this application are as follows:

#### **The presumption in favour of sustainable development**

Paragraph 11 of the NPPF has been updated and now provides:

Plans and decisions should apply a presumption in favour of sustainable development...

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The changes to this paragraph do not impact on the assessment of the application before members.

#### **Building a Strong, Competitive Economy**

Paragraph 87 of the updated NPPF adds a new requirement for planning decisions to “recognise and address the specific locational requirements of different sectors. This includes making provision for ... the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”

Paragraphs 115 to 127 set out the economic considerations in relation to this application and recognise the contribution to the provision of floorspace for that could be occupied by sectors for which the Square Mile plays a leading role, including banking, insurance, maritime, legal, accountancy and other professional services, as well as a growing cluster of technology, media and communications businesses.

### **Promoting Sustainable Transport**

Paragraph 109 of the amended NPPF sets out a vision-led approach to transport solutions. Paragraph 115 has been amended to give greater emphasis to the need to prioritise sustainable transport modes. The requirements of these paragraphs align with the approach taken by the City of London Corporation on applications.

Paragraphs 1060 to 1163 in the main report address matters relating to highways and sustainable transport.

### **Making effective use of land**

Paragraph 125c of the NPPF has been amended to give greater emphasis to giving substantial weight to the value of using suitable brownfield land within settlements for meeting identified needs, proposals for which should be approved unless substantial harm would be caused. This proposed development would deliver substantial development on brownfield land. The use of land is considered in the report in paragraphs 128 to 162 of the main report.

### **Meeting the challenge of climate change, flooding and coastal change**

Paragraph 161 of the NPPF has been amended to make specific reference to the need to transition to net zero by 2050 (the national target; the City Corporation’s Climate Action Strategy aims for a net zero Square Mile by 2040, which is reflected in the emerging City Plan 2040) and for climate impacts including overheating, water scarcity, storm and flood risk to be taken into account. Specific reference to sustainable drainage systems has been added to paragraph 164 of the NPPF. Paragraph 166 has been added to the NPPF, setting out requirements for an expectation that development should comply with development plan policies on decentralised energy, and to take account of design issues to minimise energy consumption.

Paragraphs 1639 to 1722 set out how the proposed development would address issues of environmental sustainability including carbon emissions and climate resilience.

### **Other more minor amendments**

The following table sets out more minor amendments to the NPPF which have potential implications for decision-making but which are not considered to be significant in the determination of this application.

<b>Chapter or paragraph</b>	<b>Change</b>
Paragraph 24	Highlights the importance of effective strategic planning and the duty to cooperate on cross-boundary strategic matters.

Paragraphs 96	Some minor amendments to place additional focus upon the importance of role of health and wellbeing and reducing health inequalities.
Paragraph 100	Additional references to early years and post-16 education in relation to meeting the infrastructure needs of the community
Paragraph 101	Expands the terms for public service infrastructure and places significant weight on the importance of new or upgraded infrastructure.
Paragraph 102	Additional considerations for safety and security in particularly that of children in planning policies and decisions.
Paragraph 125	Makes some minor amendments in relation to the imposition of conditions on upwards residential and commercial extensions
Chapter 12: Achieving well-designed places	Although the title to this section has removed reference to 'beautiful' places, reference to this within the text remains.
Paragraph 137	Reference to the National Model Design Code has been refocussed as the primary means for preparation of local design codes.
Paragraph 187	Includes an addition to incorporate biodiversity measures and features
Paragraph 206	Requiring information relating to the historic environment gathered through policy-making or decision-making to be made publicly available.
Glossary	Reasonable Future Scenarios- a definition of this has been included for assessing potential highways impacts and promote sustainable transport modes. Sustainable Drainage System- definition of this has been included to incorporate a mix of built and nature-based techniques. Transport assessments- insertion of accessibility and safety into the definition. Travel plan- insertion of objectives into the definition. Vision-led approach- definition inserted to set outcomes and measures to achieve these outcomes.

The below table sets out where the report makes reference to the 2023 NPPF, highlighting any changes to paragraph numbering, or where a change has been made to that paragraph. All other paragraph numbers references within the report are unchanged.

<b>Officers' Report</b>	<b>NPPF 2023</b>	<b>Change</b>
75, 106, 1026, 1749, 1751, 1760, 1761, 1803, 1804	Paragraph 208	Paragraph 208 is now paragraph 215
Paragraph 86	Paragraph 11	Update to part di) and dii), to read as follows:  For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date , granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the

		benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
Paragraphs 90 and 91	Paragraphs 96 and 97	Part c) Now refers to 'healthy lives' rather than 'healthy lifestyles', and as follows:  c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling  Paragraph 97 is now 98
Paragraph 93	Paragraph 109	Additional wording at bullets a) to c) to read as follows:  Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
Paragraph 92, 323	Paragraph 103	Now paragraph 104
Paragraph 100, 1679, 1687	Paragraph 157	Now paragraph 161. This has been rewritten to include reference to 2050 net zero targets and taking full account of the impacts of climate change.  Now reads:

		161. The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure
Paragraph 101, 1687	Paragraph 159	Now paragraph 164. Substantially redrafted to include reference to SUDS in part a) and insertion of reference to plans in part b) to read:  164. New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.
Paragraph 102	Paragraph 201	Now Paragraph 208
Paragraph 103	Paragraph 203	Now Paragraph 210
Paragraph 104, 1748	Paragraph 205	Now Paragraph 212
Paragraph 105, 1748	Paragraph 206	Now Paragraph 213
Paragraph 107	Paragraph 209	Now Paragraph 216
Paragraph 108	Paragraph 212	Now Paragraph 219
Paragraph 1027	Paragraph 200	Now Paragraph 207
Paragraph 1035	Paragraph 96	Now reads: Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: (a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-

		designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
Paragraph 1504	Paragraph 129	Now Paragraph 130
Paragraph 1645	Paragraph 8	Makes reference to 2023 NPPF which should be amended to 2024

## 2. Amended Report Wording

The following wording in bold is to be added in the section of the report which considers the impact of the proposal to the church of St Andrew Undershaft.

- Page 254, Paragraph 655; The small surviving churchyard to the north, including its walls and railings, contributes to the building’s setting and significance **and is considered a non-designated heritage asset**. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset’s significance.
- Page 257, Paragraph 673; Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church’s setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it, **as well as the significance of the churchyard as a non-designated heritage asset**. The proposal would be the latest addition to the now arguably iconic setting of modern high-rise buildings which frame the church, and its medieval charisma would remain undimmed.