

<b>Committee(s)</b> Local Plans Sub (Planning and Transportation) Committee	<b>Dated:</b> 4 March 2016
<b>Subject:</b> City of London Local Plan Review; identification of key issues	<b>Public</b>
<b>Report of:</b> Director of the Built Environment  <b>Report author:</b> Adrian Roche - Development Plans Team Leader	<b>For Information</b>

### Summary

In October 2015, the Planning and Transportation Committee approved in principle the commencement of work on a full review of the adopted City Local Plan. The first stage of the review will be to consult on key issues and on potential policy options for the new Local Plan. This report seeks to obtain the Sub-Committee's views on the issues that it considers to be of most importance to planning the City of London over the next 20 years. The views expressed by the Sub-Committee will inform the preparation of an Issues and Options consultation document, which will be reported to the Sub-Committee and the Grand Committee before the summer recess.

### Recommendations

Members are recommended to:

- Note the contents of this report and appendices; and
- Advise on key planning issues and policy options to inform the preparation of the Local Plan Issues and Options document.

### Main Report

#### Background

1. The Local Plan sets out the City Corporation's vision, objectives and policies for planning the City of London. It is accompanied by a Policies Map, in two parts, which shows where its policies apply to specific locations. The Local Plan has to be consistent with national policy and in general conformity with the London Plan prepared by the Mayor of London.

#### Current position

2. The current City Local Plan was adopted in January 2015 and it plans for development requirements up to 2026. At the time of adoption, it was recognised that an early review of the Local Plan would be necessary to take

account of recent economic and social trends, the Mayor's Further Alterations to the London Plan and new policy developments from the Government and others that emerged during 2015-16.

3. In October 2015, the Planning and Transportation Committee approved in principle the commencement of work on a full review of the adopted Local Plan, which will look forward to 2036. Work has now started and the first public milestone in the process will be to consult the public and stakeholders on the key issues to be addressed and on potential policy options. This is known as the Issues and Options stage. Responses to this initial consultation will be taken into account during the subsequent formulation of draft policies.

### **Purpose of this meeting**

4. The purpose of this meeting is to obtain the Sub-Committee's views on several key planning issues for the City of London over the next 20 years, to provide a Member steer on the direction and strength of the policy approach and thereby to determine the scope and policy direction of the new Local Plan at a very early stage.
5. It is important to identify all the relevant issues that need to be considered at the outset of preparing the new Local Plan because this will highlight where further research and evidence gathering may be required, and it should minimise the risk of unexpected issues emerging at a later stage in the process.
6. In order to facilitate discussion and an exchange of ideas, officers have prepared short briefing notes which highlight some of the main development and land-use issues that are facing the City. These have been grouped into four broad themes and are attached as appendices 1-4 of this report. The themes are:
  - the role of the City and the balance of uses;
  - infrastructure, transport and the public realm;
  - sustainable smart city; and
  - Key City Places.

### **Next steps**

7. The views expressed by the Sub-Committee will be used to inform the preparation of an Issues and Options consultation document. A full draft of that document will be reported to the Sub-Committee at its next meeting on 17<sup>th</sup> May 2016. The Sub-Committee will be asked to agree the draft Issues and Options consultation document prior to its consideration by the Grand Committee in June or July 2016. If the Grand Committee approves the document for consultation, it will be published prior to the summer recess but formal consultation will take place in September and October.
8. Production of the new Local Plan will be informed by several rounds of public consultation, together with evidence gathering and the appraisal of policy options for their sustainability, equalities and health implications. The indicative timetable considered by the Grand Committee in October 2015 shows adoption

of the new Local Plan in 2019. However, further policy changes at national and London-wide level and a Government review of the Local Plan process may affect this timetable. In any event, progression beyond the Issues and Options stage and the timing of subsequent stages will be decided by the Grand Committee in the light of the outcomes of the initial public consultation.

## **Appendices**

- Appendix 1 – note on the role of the City and the balance of uses;
- Appendix 2 – note on infrastructure, transport and the public realm;
- Appendix 3 – note on a sustainable smart city;
- Appendix 4 – note on Key City Places.

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## Appendix 1: Role of the City and Balance of Uses

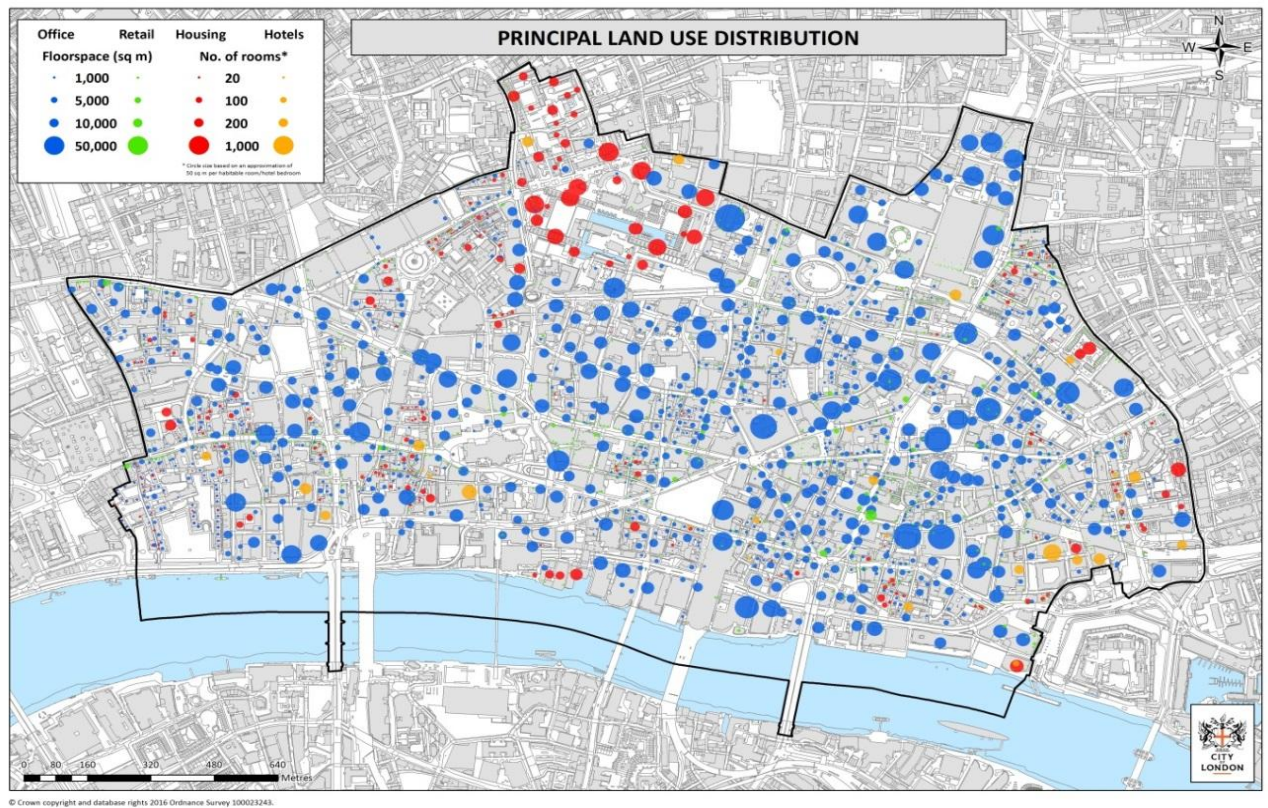
The City is the world's leading international financial and business centre, with offices as the major land use. To maintain this role, the Local Plan needs to ensure a good supply of high quality, modern and sustainable office accommodation to meet the needs of commercial occupiers. Significant projected population and employment growth in London highlights the need for a continuing pipeline of new and refurbished office floorspace. However, the ways in which office buildings are being used, office employees are working and the types of businesses seeking to locate in the City are changing, which will have implications for the type and amount of office accommodation required.

The growth in employment and population means that the City is likely to see continued demand for other land uses such as retail, hotels and a range of supporting services. The development of the Cultural Hub will bring further demand for hotel, retail and leisure uses in the north-west of the City. Government and London Plan policy increasingly prioritises housing development. These factors could impact on the overall balance of land uses in the City. Some of the key issues and questions that the Local Plan will need to address are set out below:

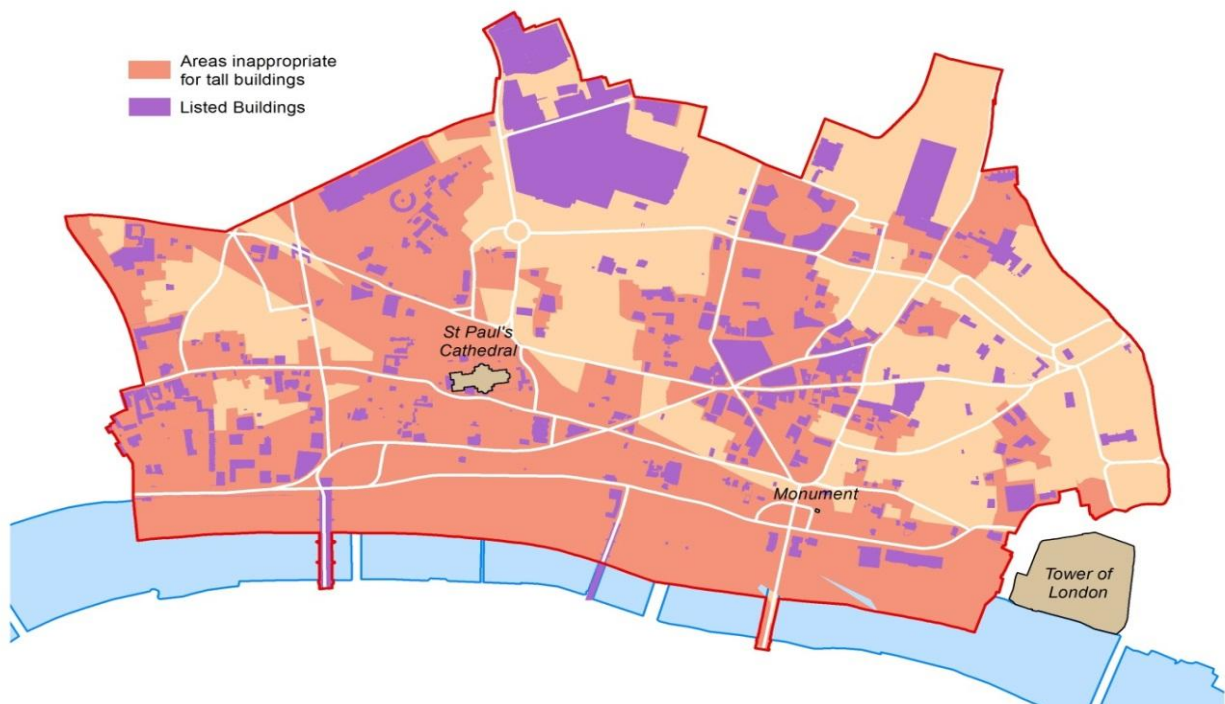
1. Should the Local Plan continue to seek to maintain the City's position as the world's leading financial and business centre? Is there scope to accommodate new and emerging employment sectors? Should we aim to maintain the City's distinctive employment base or to diversify more?
2. Is the broad policy approach of the whole City being appropriate for offices with some housing focused in residential clusters the right approach for the next 20 years? Should we protect an identified "Commercial Core" where only offices and complementary commercial uses will be permitted? Outside the core, should we be more flexible allowing a range of land uses, including housing?
3. How much office space can be allowed to change to other uses (for example to hotels or residential) before this process has an adverse impact on the role of the City as a global financial and business centre? Are we losing too much older office stock that is potentially useful to SMEs and new business sectors?
4. Should hotels in the City be complementary to business needs or should they be provided to address a wider London tourist market? How does the Cultural Hub impact on future hotel demand and should this lead to a different approach to hotels in or near the Hub?
5. Are office and residential uses incompatible in the City in terms of amenity? Are there areas of the City where office and residential can satisfactorily co-exist, including within buildings? Does co-existence still threaten the operation of the largest City firms?
6. Is there scope to accommodate further tall building development across the City and not just within the Eastern Cluster? Should the current policy approach defining inappropriate areas be relaxed/tightened? What are the

benefits of tall buildings compared with other solutions to accommodate population and employment growth?

### Distribution of office, retail, housing, hotels



### Inappropriate areas for tall buildings overlaid with listed buildings



## **Appendix 2: Infrastructure, Transport and Public Realm**

Increasing numbers of workers and visitors to the City are causing congestion on the roads, pavements and in open spaces at certain times of day, particularly in the Eastern Cluster where the further development of tall buildings will result in intense concentrations of workers and service vehicles in a constrained area. Increasing development and employment also creates demand for additional digital and other utilities infrastructure.

Some of the key issues and questions that the Local Plan Review will need to address are set out below.

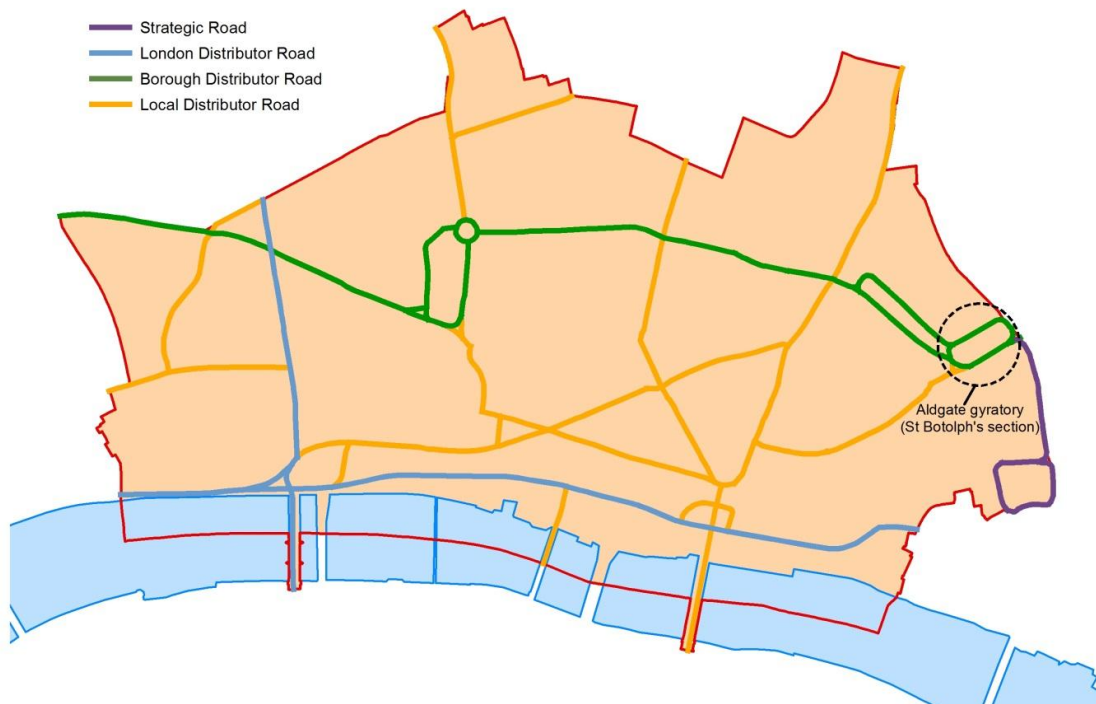
1. What role should the Local Plan play in delivering transport and public realm improvements across the City?
2. Should the Eastern Cluster be covered by a separate Area Action Plan, or a more detailed Local Plan policy, which will co-ordinate future development, public realm change and movement there?
3. With more people and vehicles on the City's streets, open space is at a premium. How can more open space be created in and around large office developments to relieve congestion? How can we create more space for pedestrians? Should certain types of vehicles be restricted in areas of high congestion? If so, how widespread should pedestrian priority be?
4. Should large buildings be encouraged or required to be permeable at ground level and provide leisure or green space on upper floors for workers and City visitors, thereby relieving the pressure on open spaces at ground level?
5. How can the conflict between limited space available for servicing and other uses be most effectively addressed? Should the Local Plan promote consolidation centres, even though this would require the use of land outside the City and over which the Local Plan has no jurisdiction?
6. How can planning policies anticipate advances in digital and other technology? How can large developments and the public realm be configured to be able to take advantage of the latest technology in terms of communications, power, data storage and management and water usage? Have we got the balance between the new infrastructure and protection of the historic and natural environment correct?



## Public transport network



## Highway hierarchy



### Appendix 3: Sustainable Smart City

The City's high density and public transport accessibility make it highly sustainable; however there are external environmental trends which must be addressed if it is to continue to be viewed as a sustainable location. How the City deals with air quality improvement, carbon emission reduction, climate resilience, waste management and access to data about the urban environment and services will determine its future, sustainable, smart city credentials. Key issues that need to be considered through the Local Plan review include:

1. Reduced numbers of vehicles on the City's streets and a greater proportion of cleaner vehicles, stricter building emission limits, cleaner construction, pedestrian-only streets and increases in green infrastructure could improve **air quality** in and around the City. Should the City Corporation explore radical local options alongside implementation of London wide initiatives?
2. Should we promote the City as a **low carbon**, smart grid<sup>1</sup> enabled place? Should enabling infrastructure such as district heating networks and smart grid transmission and distribution equipment be considered as essential for the City's future and built into the Local Plan?
3. Changes in climate mean the City's environment will need to be resilient to increased flood risk, overheating and potential changes in flora, fauna and insect-borne diseases. Should the Local Plan encourage a strategic City Corporation led approach to **climate resilience** or leave it to land owners and occupiers?
4. Should the City progress circular economy<sup>2</sup> principles and encourage a move towards greater self-sufficiency in **waste** management, avoiding the need to export large quantities of waste elsewhere?
5. Greater sharing of access to goods and services has been enabled through the use of information technology (e.g. bike sharing). Open availability of data, including from sensors and monitoring devices, encourages the creation of innovative products to improve city life (e.g. air quality mobile phone app). This is likely to accelerate in the future with technological changes that we cannot currently envisage. There are planning implications for the introduction of some enabling technologies infrastructure, particularly in conservation areas. Does the City want to be a "leader" or a "follower" on **smart city** issues?

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<sup>1</sup> A **smart grid** is an electricity supply network that uses digital communications technology to detect and react to local changes in usage, optimising usage patterns.

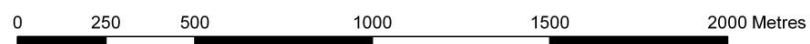
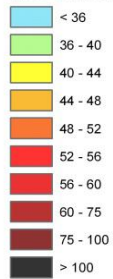
<sup>2</sup> A **circular economy** is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.



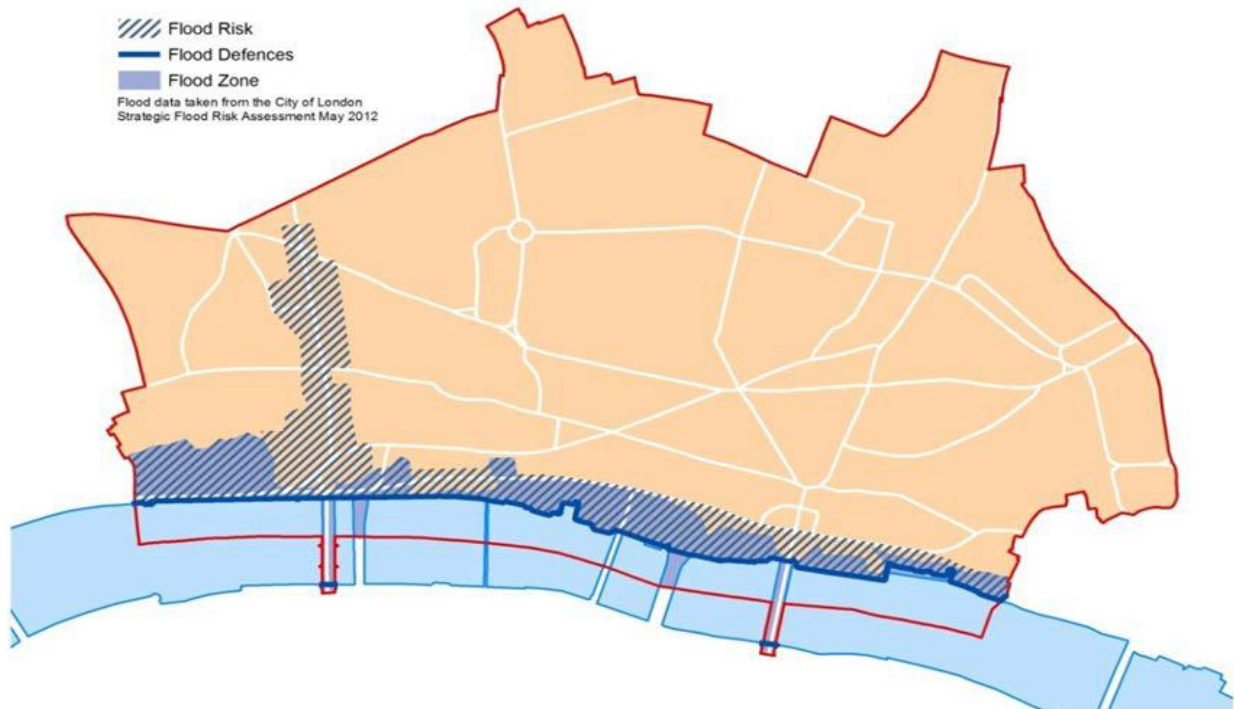
## Air quality - NO<sub>2</sub> concentration modelling 2015

OS Open Data: Contains Ordnance Survey data © Crown copyright and database rights 2010.

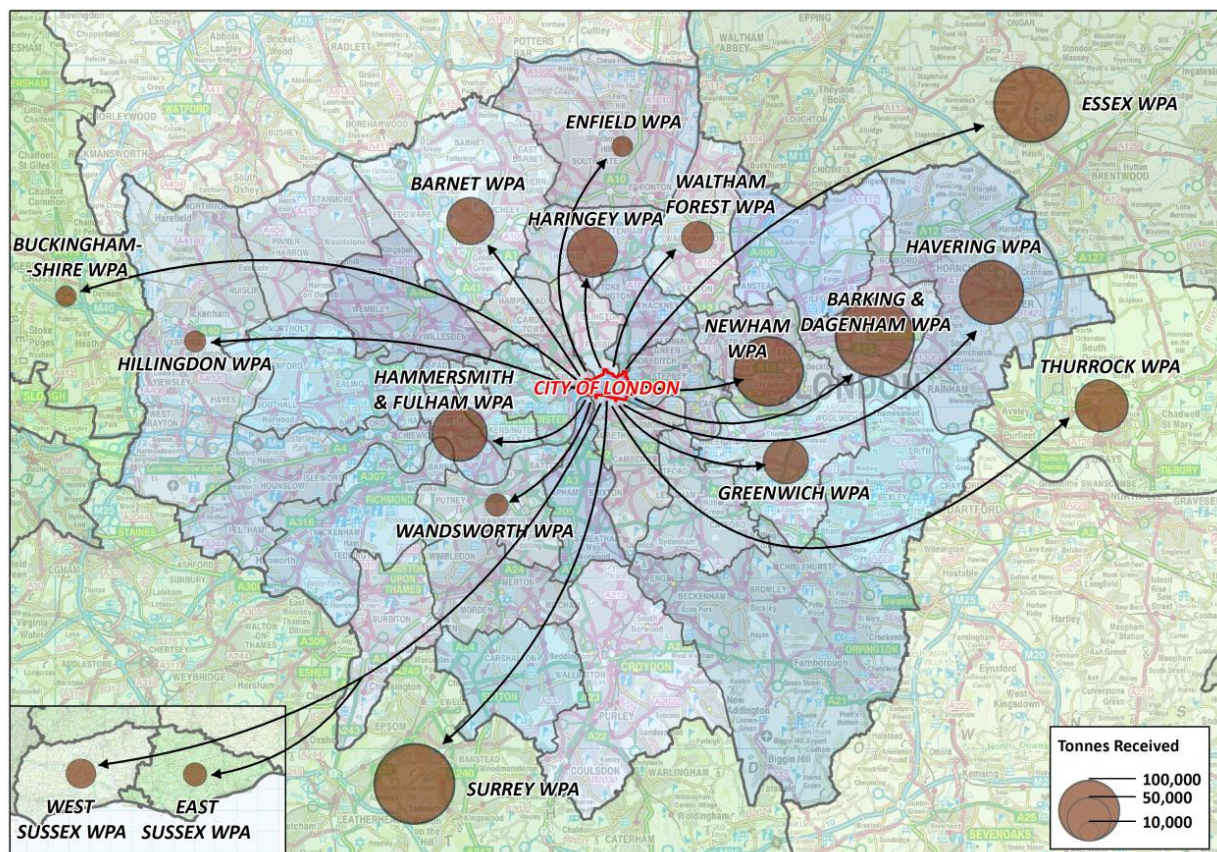
NO<sub>2</sub> concentration (µg/m<sup>3</sup>)



## Flood Risk Areas



# City of London waste exports 2009-2013 (>10k tonnes)



Note: Waste exports from Walbrook Wharf to the Riverside Resource Recovery Facility at Belvedere are classified as incineration and are not represented on this map. 50k – 60k tonnes per year is transported from Walbrook Wharf by river and used to generate energy at Belvedere in the London Borough of Bexley.

## **Appendix 4: Key City Places**

The five Key City Places were designated in the City's Core Strategy in 2011 and subsequently in the Local Plan as areas of significant change. The policies have been used to help protect and promote the areas and are used across the Corporation.

However, many of the changes envisaged in the Core Strategy have now progressed, and by the time a new plan is adopted most will have been completed. This means it is important to review these places and see if they are still relevant. A key question is, should the existing Key City Places be retained, altered or deleted? Also, should the purpose of these policies change from a focus on change, to a focus on specific character with specific opportunities or challenges?

### **North of the City**

1. Introduced to address the impact of Crossrail. By 2019, Crossrail will be operational and the station redevelopments completed. Is this single large area across the City still relevant?
2. Alternatively, should the Cultural Hub and/or the intensification around Broadgate be reflected in new areas to focus attention on the particular issues in those areas?

### **Cheapside and St Paul's**

1. Cheapside has seen significant public realm improvements in recent years alongside redevelopment and there are now few sites within the area suitable for redevelopment. Is there still a need for this policy?
2. The Bank Junction alterations and Bank Station improvements could have a significant effect; does this require a new 'Bank Place' policy or an amendment to the Cheapside and St Paul's policy? Could the area be rebranded as 'The City's High Street' to promote its image as a retail location?

### **Easter Cluster**

1. Probably the most prominent Key City Place, the term 'Eastern Cluster' has entered wider usage in the media. Large scale redevelopment is still occurring and the area is intensifying.
2. Should the Eastern Cluster be expanded to allow for further redevelopment, including more tall buildings? Should special emphasis be placed on the public realm to cope with greater numbers of office employees in the area?

### **Aldgate**

1. Like the other Key City Places, Aldgate has seen significant redevelopment since the policy was adopted and, by 2019, the works to remove the gyratory will be completed.
2. Is the area still required with the major changes completed? Should the focus of the Key City Place be altered? The area could be extended to take account



of the influence of the Tower of London and the potential for improved pedestrian routes between Aldgate and the Tower.

## Thames and the Riverside

1. The Key City Place also marks the Thames Policy Area, as required in the London Plan. The current policy looks to promote the riverside walk as well as vibrancy on parts of the riverfront.
2. Future changes on the riverfront are likely to be focused at either end, around Blackfriars in the west and Custom House to the east. Should there be greater emphasis on these areas of change within a wider Thames Policy Area?

## Key City Places from the adopted Local Plan plus the Cultural Hub

