



City of London Local Plan  
City Plan 2040  
Regulation 22 (1) (c) Consultation Statement

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## 1. Introduction

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The current Local Plan was adopted on 15 January 2015 and plans for development requirements up to 2026. In order to maintain an up-to-date local plan preparation of the new Local Plan started in 2016.

The new Local Plan, called 'City Plan 2040', is a plan for the development of the City of London, setting out what type of development the City Corporation expects to take place and where. It sets out the City Corporation's vision and strategic priorities for planning up to 2040, together with policies that will guide future decisions on planning applications. Once adopted, the new Plan will replace the adopted City of London Local Plan 2015.

The City of London Corporation is required to produce a Statement of Consultation to accompany the Proposed Submission version of City Plan 2040 for submission to the Secretary of State under regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This statement will assist the Inspector at Examination in determining whether the Plan complies with the statutory requirements for involvement and government guidance.

Regulation 22 (1) (c) of the Local Planning Regulations 'Submission of documents and information to the Secretary of State', requires a local planning authority to submit a statement setting out:

- which bodies and persons were invited to make representations under regulation 18;
- how these bodies and persons were invited to make representations under regulation 18;
- a summary of the main issues raised by the representations made pursuant to regulation 18; and
- how these representations have been taken into account
- if representations were made pursuant to regulation [20](#), the number of representations made and a summary of the main issues raised in those representations; and
- if no representations were made in regulation [20](#), that no such representations were made;
- copies of any representations made in accordance with regulation [20](#);

This document includes this information.

### Preparation stages

This statement focuses on the consultation and engagement undertaken by the City of London Corporation during the preparation of the City Plan 2040, including how the Plan has been shaped by feedback received at different stages of consultation, as set out below.

- **Stage 1:** Regulation 18 Issues and Options Stage Consultation, from 19 September to 31 October 2016, subsequently extended to 2 December 2016 (11 weeks). Views were sought on what the Plan should contain and the key issues it should address.
- **Stage 2:** Regulation 18 Draft Local Plan Consultation, from 12 November 2018 to 28 February 2019 (15 weeks). Views were sought on the full draft plan, including vision, objectives and detailed policies.
- **Stage 3:** Regulation 19 Publication - Proposed Submission Draft Consultation. A minimum six-week consultation during March and April 2021. Representations made in response to this consultation are made under regulation 20.
- **Stage 4:** informal public engagement was undertaken from June-July 2023 to inform changes to the City Plan 2040. Ten public events were organised, focussing on specific themes and the City's seven Key Areas of Change. Online engagement through the Planning Division's Commonplace platform was also carried out.
- **Stage 5-** Regulation 19 Publication carried out between 18 April and 17 June 2024. Representations made in response to this consultation are made under regulation 20.

This statement is compliant with The Localism Act 2011 which sets out the legal duty to cooperate between local planning authorities and other public bodies and stakeholders to maximise the effectiveness of policies covering strategic matters in a local plan.

### Statement of Community Involvement

The City of London Corporation has a statutory duty to consult and seek representations in preparing a Local Plan. The [Statement of Community Involvement \(SCI\) 2023](#)<sup>1</sup> sets out how the City Corporation will consult and engage on planning matters. A rigorous process of consultation has been undertaken with a broad range of partners, stakeholders, government bodies, local communities, and businesses during the preparation of City Plan 2040. This report demonstrates how planning officers have taken into account the responses from the public consultations.

The Statement of Community Involvement (SCI), adopted in May 2023, sets out measures for consulting the public on planning policies and planning applications in the City of London. Consultations on City Plan 2040 have been undertaken in accordance with the provisions of the SCI.

The SCI identifies those bodies that need to be consulted. These include:

- specific consultation bodies such as neighbouring boroughs, the Mayor of London, government agencies and utilities providers;

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<sup>1</sup> Appendices updated July 2024

- general consultation bodies, including organisations with an interest in City planning, and amenity groups, property, trade and business associations, civic groups, cultural organisations, places of worship and voluntary organisations whose activities benefit the City and bodies that represent issues of race, ethnicity, gender, age, sexual orientation, disabilities and those with caring responsibilities; and
- Residents, businesses and landowners located in the City.

The City Corporation maintains a database of individuals and organisations interested in planning policies. As well as the specific and general consultation bodies, this list includes those who have previously responded to consultation on other planning documents, including the adopted Local Plan.

The City Corporation also maintains a digital database on its [online consultation portal](#) for those that have signed-up to receive updates on the Local Plan consultation.

The various stages of consultation for City Plan 2040 were carried out in accordance with the City Corporation's SCI, engaging with specific and general consultation bodies and those individuals and organisations on the City Corporation's planning policy consultation database.

A full list of the specific and general consultation bodies is available within Appendix A of the Statement of Community Involvement.

### Duty to Cooperate

The Duty to Cooperate was introduced in the Localism Act 2011 placing a legal duty on local planning authorities to engage actively, constructively and on an ongoing basis to maximise the effectiveness of Local Plan preparation on strategic cross boundary issues.

In accordance with the Duty, the City of London Corporation has engaged constructively with its neighbouring authorities and other prescribed bodies on all strategic cross boundary matters. The details of meetings and other forms of cooperation are included in the accompanying Duty to Cooperate Statement (2024) and Statements of Common Ground between the City of London Corporation and relevant duty to cooperate bodies, all available on the City Plan website.

## 2. Regulation 18 Plan Preparation

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Two public consultations were undertaken in the early stages of plan preparation in order to satisfy the requirements of regulation 18 of the Local Planning Regulations. This regulation requires local planning authorities to consult with specified bodies and individuals on the subject and contents of the proposed local plan and to take any representations into account in drafting the plan.

**Stage 1 - Issues and Options Consultation:** sought views on the key issues and policy areas that City Plan 2036 should contain and how these issues should be addressed. The consultation ran from 19 September 2016 to 31 October 2016, subsequently extended to 2 December 2016. The Issues and Options Consultation Statement has been incorporated into this Consultation Statement.

**Stage 2 - Consultation on a full draft of City Plan 2036:** sought views on the specific strategic objectives, vision and detailed policy wording in the draft plan. This consultation ran from 12 November 2018 to 28 February 2019.

### Stage 1: Regulation 18 Issues and Options Consultation

The Issues and Options Consultation was carried out under Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2004, the regulations were subsequently superseded in 2009. It was intended to gauge the views of interested organisations and members of the public on the key planning issues facing the City.

The City Corporation's SCI states that the objective at this stage is to assist the City Corporation in the identification of issues which the Local Plan needs to include, and to discuss possible alternative policies and proposals to address these. It adds that another purpose of the consultation is to ensure that community views are considered at an early stage in the plan making process and to build and develop on-going community involvement.

The City Corporation published the Issues and Options in the form of a discussion document, which identified key planning issues facing the City and posed a number of questions regarding its future development. The consultation questions were phrased in an open style, rather than setting out a specific list of options. This was done to encourage debate and not preclude respondents from coming up with their own ideas and suggestions.

By enabling a wide range of views to be expressed, it was hoped this would highlight where further research may be required and minimise the risk of unexpected issues emerging at a later stage in the process.

Alongside the Issues and Options discussion document, the City Corporation published an Evidence Summary document, containing summary facts and

figures about land use and development in the City of London, including current baseline data and recent trends. The document aimed to provide information that would be helpful to people who intend to respond to the Issues and Options consultation questions.

Both the Issues and Options discussion document and the Evidence Summary are available on the City Corporation's website.

Public consultation on the City of London Local Plan Issues and Options took place over an initial six-week period from 19 September to 31 October 2016. It was extended until 2 December 2016 (a total of 11 weeks), with a small number of representations accepted after 2 December 2016.

### Consultation methods

Over 1,350 emails and letters were sent to consultees on the planning policy consultation database as at 2016. At this stage this included all the statutory consultees and individuals who had registered with the City Corporation for local plan updates. A separate email was also sent to 3,300 business occupiers. In addition, letters were sent to all properties in the City which are registered as residential for council tax purposes, over 6,200 in total.

These letters and emails advised recipients of the consultation and invited comments. They also explained where the consultation documents and other information were available to view.

A range of methods were used to publicise the consultation:

**Website:** The City Corporation's website contained extensive information on the consultation. A City Plan 2036 webpage was created, which included the Issues & Options discussion document, the Evidence Summary, a comment form and an online questionnaire. It also explained where printed versions of these documents could be obtained. The consultation was publicised on the City's Intranet pages, promoting it to all staff members.

**City Libraries:** During the consultation period the Issues & Options discussion document and other supporting documents were made available at the Guildhall and the City's public libraries, during normal opening hours, as set out below:

Location	Opening Timings
Department of Built Environment Enquiries Desk, Guildhall	Monday-Friday 9:15am-4:30pm
Guildhall Library and City Business Library Aldermanbury London EC2V 7HH	Monday, Tuesday, Thursday, Friday 9:30am-5pm Wednesday 9:30am-7:30pm Saturday 9:30am-5pm (on selected Saturdays only)



Location	Opening Timings
Artizan Street Library and Community Centre 1 Artizan Street, London, E1 7AF	Monday 8am-7pm Tuesday-Friday 8am-4pm
Shoe Lane Library Little Hill House Little New Street London EC4A 3JR	Monday, Wednesday-Friday 9.30am-5.30pm Tuesday 9.30am-6.30pm
Barbican Library Silk Street London EC2Y 8DS	Monday, Wednesday 9.30am-5.30pm Tuesday, Thursday 9.30am-7.30pm Friday 9.30am-2pm Saturday 9.30am-4pm

**Eshot:** The City Corporation issues an *eshot* to inform the subscribers of news and current issues. The *eshot*'s subscribers include businesses and employees. A message publicising the consultation was published and issued via the City Surveyor's Department to 200 business occupiers.

**City Resident:** This is published three times a year and contains news about the community, environment, events and the latest updates from City Police. An article regarding the consultation was published in the autumn 2016 issue.

**Business Representation Groups:** Direct contact was made with specific business groups and interests to alert them to the consultation and it was requested that consultation notifications were circulated to their members. This included the City Property Association, Cheapside BID, Aldgate Partnership, Inner and Middle Temple Associations.

**Member Notification:** Direct notification of the consultation was sent to all Common Council Members by letter and email and an article appeared in the September 2016 Members' Briefing. An additional briefing meeting for Members was held in October 2016.

**News coverage:** A press release was published which gained wide publicity in the local, professional planning and property press. City Matters, a local paper for the City of London, featured the consultation on the front page of their maiden edition. There were also articles in Planning Magazine and Property Week.

**Facebook:** A post regarding the consultation was made to the "City of London Corporation: City View" Facebook account on 20 September 2016. The account is "Liked" or "Followed" by around 13,000 different Facebook users.

**Twitter:** Posts were made about the consultation on the 19 September 2016 and 26 October 2016 from the @squarehighways Twitter account, which has around 3,000 followers. Posts regarding the consultation were also made from third party Twitter accounts, such as @tfltp, a TFL account about Taxis and Private Hire vehicles, which has over 11,000 followers and @PWnews, the Property Week account, which has over 60,000 followers.

**Summary Leaflets:** A leaflet summarising the discussion document was produced to publicise the consultation. 1,500 copies of the leaflet were printed and distributed around the City. These were placed in key locations to target workers, residents and visitors. These included housing estate offices, libraries, churches, office foyers, and medical buildings. These leaflets were also made available electronically on the City Corporation's website and copies placed in City libraries and made available during public consultation events and meetings.

### Events and meetings

Officers of the Department of the Built Environment attended the following meetings to explain the consultation, promote discussion and receive comments:

**Public Consultation Events:** Two events were held at the City Centre on 3 October and 13 October 2016, to help publicise the consultation. These events were open to the public and involved a presentation, question and answer session and information displays. The first event took place in the late afternoon/early evening, while the second was held in the morning to reach different audiences.

**Barbican:** Officers were present to answer queries at the launch of the Barbican Low Emission Neighbourhood on 11 January 2017.

**Health and Wellbeing Board:** This is a forum where key leaders from the health and care system work together to improve the health and wellbeing of the local population and reduce health inequalities. A presentation was given on 13 June 2016 to the Board, which covered the aims of the consultation, content and how to respond.

**Conservation Area Advisory Committee (CAAC):** The CAAC was set up to advise the City Corporation on planning proposals and policies relating to conservation areas. A presentation was made to the Committee at its meeting on 29 September 2016.

**Department of the Built Environment Users Panel:** The Panel was established to represent users of the service provided by the Department. Users Panel members were briefed on the Issues and Options consultation at their meeting on 13 July 2016.

**Access Group:** The group was established to advise the City on access issues. A discussion was held with, and an email sent to, the Head of Access on 20 September 2016, explaining the aim and content of the Issues and Options consultation and how responses could be made.

As set out in Section 2 an extensive consultation exercise has been undertaken at both the Issues and Options and Draft Plan, regulation 18, stages of the preparation of City Plan 2036. This section provides a summary of the response to the respective consultation periods.

## **Consultation Responses**

A total of 911 formal comments were received from 65 organisations and individuals. In addition, 150 anonymised comments were collected at consultation events.

**Appendix 1:** lists those who responded to the Issues and Options consultation.

**Appendix 2:** summarises the written comments made in response to the consultation in the same order as the questions in the consultation document and questionnaire. Copies of the full comments are available for inspection on request.

**Appendix 3:** summarises the comments received at the public consultation events at the City Centre, as well as at the launch of the Barbican Low Emission Neighbourhood.

## **Stage 2: Regulation 18- Draft City Plan 2036 Consultation**

The City of London consulted on a full draft City Plan 2036 alongside the draft Transport Strategy between 12 November 2018 and 28 February 2019. Copies of the draft City Plan 2036 and consultation material were made widely available and an interactive summary placed on the City of London's website. An extensive consultation exercise was undertaken comprising mailouts, posters, social media, and many events were held during the consultation period.

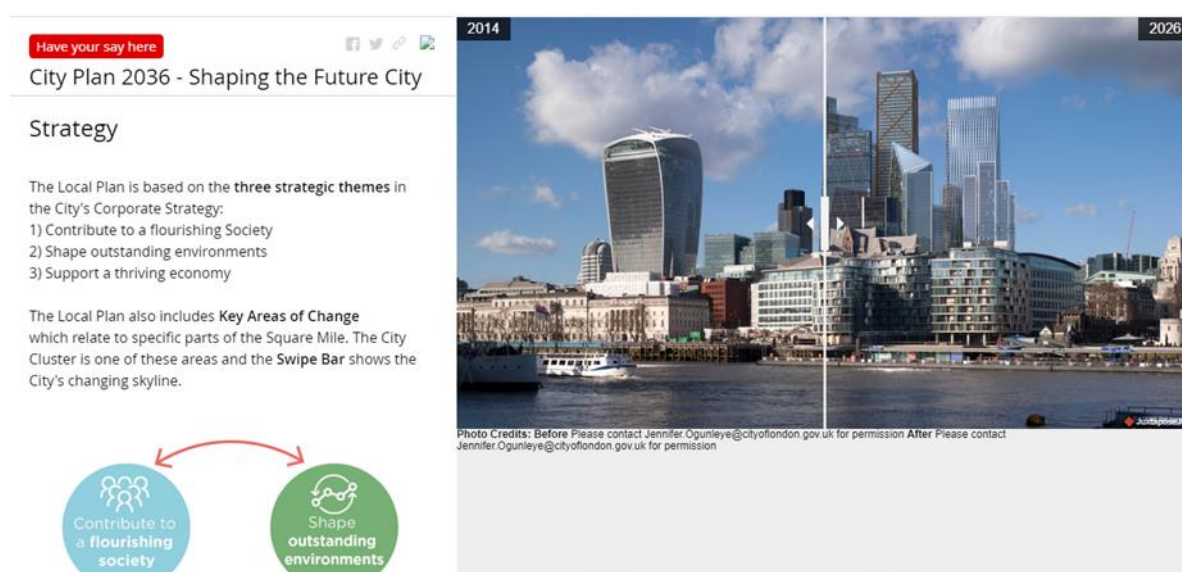
### **Consultation methods**

An extensive and wide-ranging programme of engagement measures was undertaken during the draft Local Plan consultation.

**Website:** A bespoke consultation page for the draft City Plan 2036 was created on the City Corporation's website. The following information was available on this webpage throughout the consultation period:

- Draft City Plan 2036
- Summary leaflet – highlighting key aims and objectives and policy areas in the draft Plan and providing details on how to respond to the consultation
- Online consultation comment form
- Draft Local Plan Story Map - A summary of the Plan with virtual and interactive mapping
- Emerging evidence base – a full list of the evidence documents used to prepare the draft City Plan 2036
- Integrated Impact Assessment (IIA), comprising the sustainability appraisal, health impact assessment screening and equalities impact assessment screening.
- Habitats Regulations Assessment screening.

The website provided information on where printed versions of these documents could be obtained, and details of forthcoming consultation events. The website was updated on a regular basis. The City Plan 2036 website was accessed 8,123 times between November 2018 and February 2019, with the City Plan document opened 2,379 times. There were approximately 20 views per day of the Draft Local Plan Story Map.



**Figure 2: Screenshot from City of London Local Plan Story Map**

The consultation was also publicised on the City Corporation's Intranet pages, promoting it to all staff members and articles were placed in the Department of the Built Environment's internal newsletter and the Town Clerks Bulletin to all staff.

**City Libraries:** During the consultation period the draft City Plan 2036 document and other supporting documents were made available at the Guildhall and the City's public libraries, during normal opening hours. The list

of libraries and opening hours is set out in the Stage 1: Issues and Options consultation statement.

**Direct Notification:** notification of the consultation was sent directly to a number of individuals and organisations:

- Specific and general consultation bodies identified in the City Corporation's SCI.
- Email notification to 318 individuals and companies on the City Corporation's consultation database which included all the statutory consultees as identified in the SCI. The local plan consultation database was significantly smaller than at Issues and Options Stage due to the introduction of new General Data Protection Regulations shortly before the consultation which required consultees to give their express consent to email notification.
- A letter was sent to all City of London residential addresses notifying occupiers of the consultation.
- Email notification to approximately 4,600 City businesses listed on the City Corporation's City Occupiers Database.

**Member Notification:** Direct notification of the consultation was sent to all Common Council Members by email and an article appeared in the November 2018 Members' Briefing. Information was also published in each of the 22 Ward Newsletters in December 2018.

**City View:** This is published twice a year and available on the City Corporation's website. It is the magazine of the City Corporation and provides updates on the work of the Corporation for local residents, workers and businesses. An article on the draft City Plan 2036 was published in the December 2018 edition of City View, providing details of how to comment on the draft Plan.

**Business Representation Groups:** Direct contact was made with specific business groups and interests to alert them to the consultation and request that notifications be sent to business group members. This included the City Property Association, Cheapside BID, Aldgate Partnership, Inner and Middle Temple Associations. Information about the consultation was included in the Cheapside BID newsletter in January 2019, the City Centre email update in December 2018 and February 2019, and the City of London Police 'Skyline' newsletter to business and community groups in December 2018. Information was posted on the City Property Association, Culture Mile, Bishopsgate Ward and Business Healthy Twitter accounts.

**News coverage:** A press release was published at the start of the consultation period and updates/reminder press releases issued during the consultation which gained wide publicity. Articles appeared in a number of professional planning and property newspapers and journals, including the Architects Journal, Bdaily, City AM, City Matters, City Metric, Construction

Manager, Construction News, Personnel Today, Planning Magazine, Property Week, and the Guardian.

**Social Media:** Information about the consultation was posted on the City Corporation's Facebook, LinkedIn and Twitter pages. Messages were posted at the start of the consultation and at regular intervals during the consultation. In the final weeks of the consultation, in February 2019, a series of questions about the City Plan were posted on Twitter, Facebook and LinkedIn to further stimulate consultation responses:

	<b>Message/ Tweet</b>	<b>Date</b>
1	Does the Square Mile need more green walls, green roofs and street planting? Have your say on shaping the future City <a href="#">CityPlan2036</a> Consultation closes on 28 <sup>th</sup> February	15 February 19
2	Love or hate skyscrapers? Want to see more in the Square Mile? Have your say on shaping the future City <a href="#">CityPlan2036</a> Consultation closes on 28 <sup>th</sup> February	19 February 19
3	Been to the riverfront lately? Does the Square Mile make the most of the river and its riverside location? Have your say on shaping the future City <a href="#">CityPlan2036</a> Consultation closes on 28 <sup>th</sup> February	21 February 19
4	Want to see more shops in your part of the Square Mile? More bars and restaurants? Last chance to have your say on shaping the future City <a href="#">CityPlan2036</a> – closes Thursday	25 February 19
5	Too much noise and bustle in the Square Mile? Or do you like the buzz? Last chance to have your say on shaping the future City <a href="#">CityPlan2036</a> – closes tomorrow	27 February 19
6	Too many delivery vehicles getting in your way during peak hours. Does the Square Mile need to restrict delivery timing? Last chance to have your say on shaping the future City <a href="#">CityPlan2036</a> – closes today!	28 February 19

### **Social Media questions on the draft City Plan 2036**

**Summary Document:** A summary of the key policy ambitions in the draft City Plan was produced to publicise the consultation. 1,000 copies of the summary were printed and distributed around the City. 2,000 copies of a postcard sized leaflet advertising the consultation and consultation events were also produced. The summary and postcard were placed in key locations to target workers, residents and visitors, including at housing estate offices, libraries,



churches, office foyers, and medical buildings. These leaflets were also made available electronically on the council's website and during public consultation events and meetings.

### Events and meetings

Officers of the Department of the Built Environment attended a number of public consultation meetings and drop-in sessions to explain the consultation, promote discussion and receive comments. Officers also made presentations to a number of business and other groups.

Two consultations events were held in January 2019 at the Guildhall:

- Stakeholder Consultation Event on 18 January 2019 attended by 62 people.
- Public Consultation Event on 28 January 2019 attended by 39 people.



**Figure 3: Consultation Event, Presentation Guildhall Art Gallery**



**Figure 4: Consultation Event, Public Exhibition Guildhall Art Gallery**

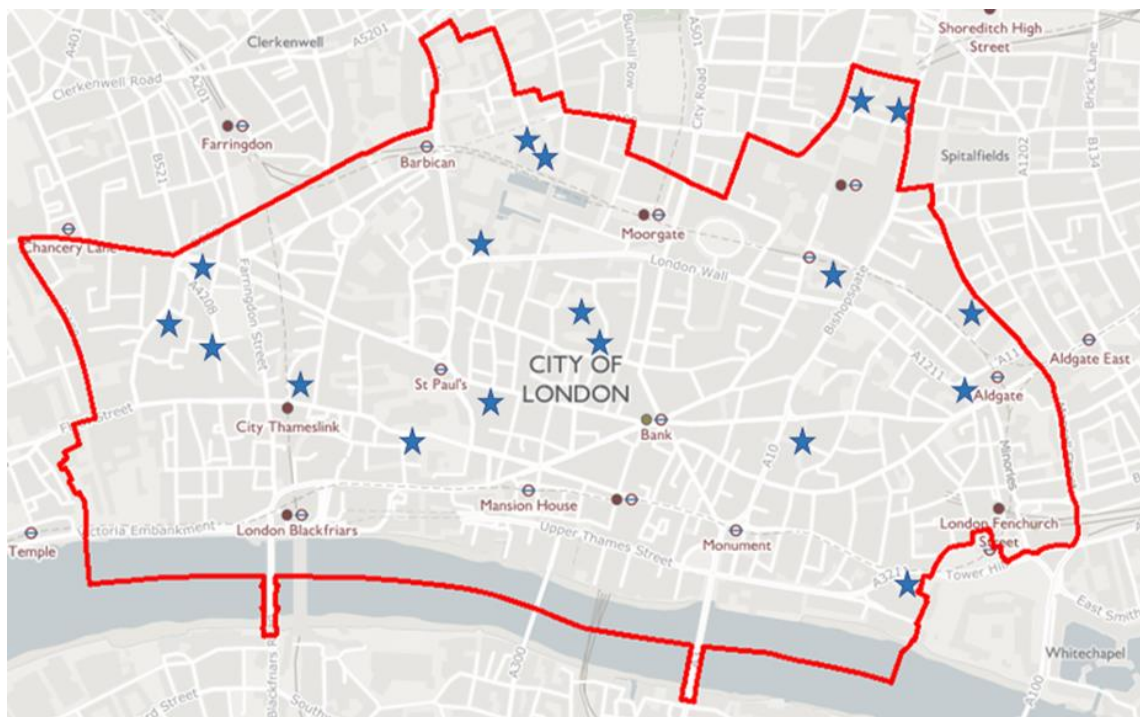
### **Drop-in sessions**

A total of 24 informal drop-in sessions were held throughout the consultation, at which officers were available to explain the draft City Plan, answer questions and encourage responses to the consultation. The venues of the drop-in sessions were chosen to engage with different communities, both geographically and in terms of the likely audience. Locations are shown on the map below.



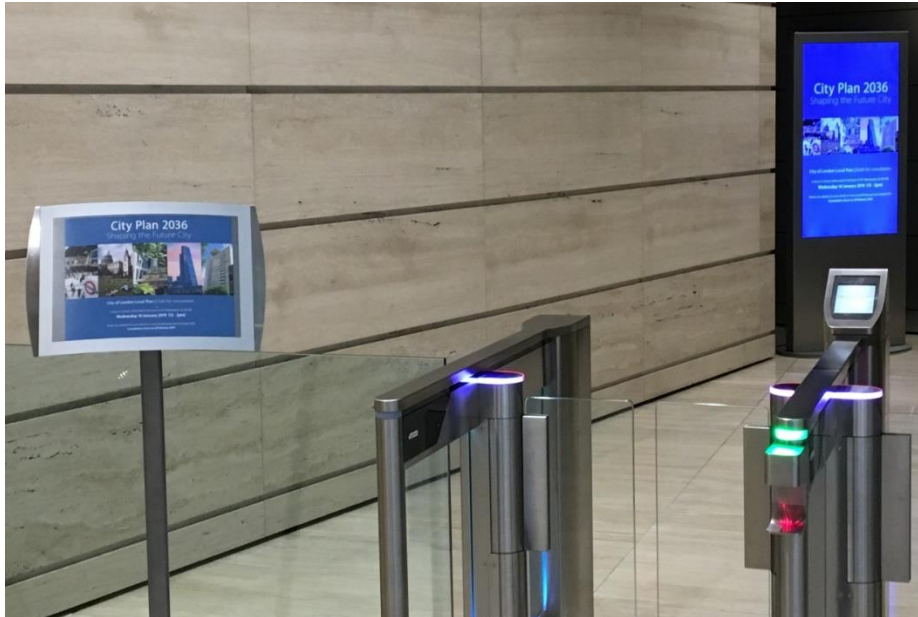


**Figure 5: Drop-in session Public Exhibition – One New Change**



**Figure 6: Location of drop-in sessions**

Interactive display screens showcasing the City Plan were made available for some drop-in sessions and at the Guildhall reception to attract further interest.



**Figure 7: Display screens at the staff entrance of 201 Bishopsgate**

### **Presentations**

City Corporation officers attended 8 separate meetings organised by external stakeholders and made presentations on the draft City Plan:

- City Property Association (CPA)
- City Property Association Next Gen Group,
- Clean City Awards Scheme (CCAS) Forum,
- Bishopsgate Ward,
- LCCI Property and Construction Breakfast Event,
- Hi-Rig Breakfast Meeting,
- Culture Mile Network, and
- University of Liverpool in London.

Presentations were also made to the Department of the Built Environment Users Panel on 6 December 2018, and to the Health & Wellbeing Board shortly before the start of the consultation on 21 September 2018.

Consultation on the draft City Plan 2036 was timed to complement consultation on the City of London Transport Strategy. Officers attended a range of Transport Strategy consultation events to present information on the draft City Plan and to answer questions. This included the Transport Strategy Stakeholder Event at the Guildhall on 30 November 2018.

### **Youth Engagement Event**

The City Corporation commissioned Beyond the Box to design and run a bespoke consultation event on the draft City Plan for young people aged 17 to

25. The event took place on 20 February 2019 in the City Centre and was attended by 38 young people. Following the event, a consultation report was prepared for the City Corporation, which is attached at [Appendix 7](#), and a video of the event posted on You Tube.



**Figure 8: Youth Engagement Workshop**

### Consultation Responses

A total of 908 comments were received on the draft City Plan 2036, from 187 respondents. These comments include comments made in writing at consultation events, drop-in sessions, via social media, and in formal representations sent to the City Corporation during the consultation period. Other general comments and observations made during the consultation events and at drop-in sessions and other meetings have not been individually recorded but were noted and have been considered in making further changes to the draft Plan prior to regulation 19 consultation.

**Appendix 4 – list of respondents to the draft City Plan 2036 Consultation** lists those who responded to the Draft City Plan 2036 consultation.

**Appendix 5 – Draft City Plan 2036 Consultation Responses:** lists the comments made in response to the consultation in the draft City Plan 2036 policy order, together with the City Corporation's response indicating how these comments have been reflected in the Revised Proposed Submission Draft City Plan 2040. Copies of the full comments are available for inspection on request.



### 3. Stage 3: Regulation 20 Proposed Submission Consultation (2021)

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#### Consultation approach

The draft City Plan 2036 was amended following the comments received at regulation 18 stage. The Proposed Submission Draft City Plan 2036 was approved for regulation 19 publication (pre-submission) consultation by the City Corporation's Court of Common Council on 21 May 2020.

Local Plan regulations in place in May 2020 required the City Corporation to make physical copies of the Plan and other supporting material available for inspection during the regulation 19 consultation. The Covid-19 pandemic and national lockdown restrictions meant that the City Corporation could not meet the regulatory requirements and consultation was postponed. The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 temporarily removed the requirement to make physical copies of documents available until 31 December 2020, subsequently extended until 31 December 2021 under the Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020.

On 31 August 2020 revised permitted development rights came into effect and, on 1 September 2020, a revision to the Use Classes Order came into effect. These new regulations required the City Corporation to make further changes to the draft City Plan to ensure that it aligned with national planning policy.

The revised Proposed Submission Draft City Plan 2036 was then considered and approved by the City Corporation at a meeting of the Court of Common Council on 14 January 2021, and the plan was published for 'Regulation 19' consultation.

Public consultation was carried out online only from 19 March 2021 to 10 May 2021 in accordance with temporary regulations designed to enable plan-making activity to continue during the Covid-19 pandemic.

#### Consultation responses

A total of 1,327 representations were received from 171 respondents. This appendix provides an outline of the main issues raised, grouped by theme and in the same order as the draft Plan itself.

Notwithstanding the absence of in-person events, this was a significantly higher response rate than at the equivalent pre-submission stage of the City's current adopted Local Plan. Over 50% of responses were from individual members of the public. Other responses were received from a range of

statutory bodies and interest groups. There were relatively few responses from the development industry, albeit that the City Property Association (CPA) responded on behalf of their 150+ members.

### Summary of key issues raised

#### **Vision, Strategic Objectives and Spatial Strategy**

There were 110 representations on this section of the Plan, and the key points raised are outlined below:

- The Mayor of London felt that the vision and approach aligned well with the London Plan's Good Growth objectives, noting a greater focus on the health and wellbeing of the City's communities and how this relates to the design of new buildings, open spaces and the wider public realm. The Mayor welcomed the identification of 7 key areas of change supported by an overarching spatial strategy which promotes reductions in greenhouse gases and improvements in air quality. He considered the overall spatial strategy and growth projections to be consistent with the London Plan, notwithstanding his concerns about a divergence from the London Plan in relation to tall buildings.
- The CPA supported the strategic aims although it considered the figures in Table 2 of the spatial strategy to be overly prescriptive and advocated recognising market trends and building in greater flexibility. In particular, the CPA questioned the evidence base to support "significant retail development" in the four Principal Shopping Centres.
- London Sephardi Trust and the Spanish and Portuguese Sephardi Community considered the spatial strategy to be unbalanced and highlighted point 6, which seeks to focus new tall buildings in the existing cluster while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site. They noted there is no reference in this part of the spatial strategy to the preservation of views of other important heritage assets or to the preservation of important views out from and/or the setting of important heritage assets within the cluster. In their opinion, the primarily economic objective served by the construction of tall buildings in the cluster is thereby allowed to dominate (around 80 largely identical representations were received supporting this point).
- The Barbican Association noted that the spatial strategy aspirations do not include protecting residential amenity. It felt the omission of any mention of residential amenity in this key strategy makes all the other mentions of it in the Plan of little value.
- The Golden Lane Estate Residents' Association considered the target to transition to a zero carbon and zero emissions City by 2040 to be unambitious and the housing target to be extremely unambitious.
- The Surveyor to the Fabric of St Paul's Cathedral expressed concerns about point 9 of the spatial strategy, suggesting that balancing growth

with the protection and enhancement of the City's unique heritage assets and open spaces is ambiguous and may allow harm to public heritage assets.

- LB of Tower Hamlets indicated it was broadly supportive of the City Plan's vision and objectives and recognised the need to work across borough boundaries to address key spatial matters.
- Other respondents from the business community, amenity groups and arts organisations expressed general support for the draft Plan's vision and objectives, for instance welcoming the commitments to ensuring further urban greening and improvement of air quality, the aspiration to deliver sustainable growth following the pandemic and the ambitions to strengthen active travel and support culture in the City.

## **Healthy and Inclusive City**

There were 51 representations on the policies in this section of the Plan, which raised the following main points:

- Healthwatch City of London made several comments. They noted that the Plan recognises the main contributors to poor health but observed that it is difficult to see how the City will manage its commitment to improving health. For instance, there is no mention of the infrastructure for health and wellbeing including GP services, diagnostic centre, social care services, and mental health provision. They also commented that while this section provides the right sentiment, there should be a greater emphasis on 'must' rather than 'should'. The City should be at the forefront of managing urban problems such as noise and light pollution.
- The Golden Lane Estate Residents Association questioned why private healthcare facilities are exempt from the requirements of Policy S1 given the limited facilities in the City.
- Healthwatch City of London called for more attention on physical accessibility across the City, while another respondent felt the Plan's focus was on developers' responsibilities, but more should be done to improve pavements, pedestrian crossings etc.
- The CPA suggested that Air Quality Impact Assessments (AQIAs) should only be required where there is 1,000sqm or more floorspace created. The policy as drafted would capture change of use applications. However, another respondent called for the City Corporation to take a more robust approach to AQIAs and employ consultants at the developers' expense to rigorously review the methodology and monitor outcomes.
- The Barbican Association requested the air quality policy include the establishment of zero emission zones around residential areas.
- A few respondents felt more emphasis needs to be placed on light spillage. The Barbican Association suggested a requirement for lighting

impact assessments in the same circumstances as noise impact assessments.

- The CPA commented that a loss of social infrastructure and community uses may be acceptable where it is part of a published strategy or where the loss leads to funding for enhanced facilities elsewhere. They also suggested a more strategic approach should be taken to community facilities through supplementary planning guidance.
- The Golden Lane Estate Residents Association argued that as there are few social and community facilities in the City at present their loss should be strongly resisted.
- Sport England commented that there does not appear to be a robust and up-to-date evidence base in relation to indoor and outdoor sports facilities. They had concerns with the wording of Policies HL5 and HL7, for instance that the criteria for assessing the loss of existing sports and community facilities does not consider future needs/demands or other sports clubs that may wish to have access to a facility but currently do not.
- A group of City residents/City commuters commented that the Plan does not address the requirements of space within the public realm to make it suitable for exercise nor does it mention dual use of public space.

## **Safe and Secure City**

There were 13 representations on this section of the Plan, which raised the following main points:

- The Surveyor to the Fabric of St Paul's Cathedral stated that Policy S2 should not only focus on new development, noting there is a need to implement enhanced security measures around St Paul's.
- The CPA commented that the requirement under Policy SA1 (Crowded Places) for all major developments to conduct a full risk assessment is not justified and should be more flexible.
- The CPA suggested the requirement under Policy SA2 (Dispersal Routes) for all major developments to submit a Management Statement could be secured by a planning condition as in many instances details are not known at the application stage.
- TfL suggested the use of trees, planters and benches to reduce the impact of Hostile Vehicle Mitigation measures.
- The Barbican Association commented that the expectation for dispersal routes relies on management action and the City Corporation has insufficient resources to deliver this.
- The Barbican Association suggested the Plan should set out requirements for building materials that are more resistant to bomb blasts than continuous glass surfaces.

## Housing

There were approximately 30 representations on this section of the Plan, which raised the following main points:

- The Mayor of London welcomed the Plan's commitment to meet the London Plan housing target and the small sites target and supported directing new housing to locations in or near identified residential areas.
- The Mayor generally supported the approach to affordable housing, subject to certain detailed wording issues, but commented that the proposed tenure split is not in accordance with the London Plan.
- The Barbican Association commented that the Plan has an aspiration to build 2,482 new housing units near to existing residential clusters, but no means of ensuring that happens. The Plan refers to "windfall" sites i.e. ad hoc, unplanned and providential.
- The Golden Lane Estate Residents Association commented that existing housing estates in the City are already very dense and new building in their boundaries would be inappropriate. The City needs a strategy for identifying suitable sites.
- A few respondents sought a more positive policy approach to housing, for example suggesting restrictions on change of use of offices to residential will need to be reconsidered in light of increased remote working post the pandemic. Another considered that residential development, particularly as part of mixed-use development, can support economic success and should be assessed on a case by case basis.
- The Barbican Association called for more specifics on how the cumulative impact of individual developments on residential amenity (Policy HS3) will be defined. There needs to be an explicit statement of a baseline.
- A student housing provider suggested amendments to Policy HS6, e.g. to recognise that purpose-built student accommodation can support the City's primary business function; to remove reference to student housing compromising the delivery of conventional housing; and to remove the requirement for such schemes to be supported by higher education institutions within the City of London or the CAZ.
- Middle Temple sought the removal of the policy requirement to maintain an overall balance of residential accommodation and professional chambers in The Temples. There has been an organic reduction in the number of residential units and the need for residential accommodation has diminished as a result of the pandemic. There should be flexibility to convert residential units to professional/office use as required.



- The Mayor of London supported the policy on older persons housing and suggested the City Corporation should work with providers to identify sites that may be suitable to meet the need.

## Offices

There were just over 20 representations on this section of the Plan, with the main points raised being:

- Support from business respondents and from the Mayor of London for the target to deliver 2 million sqm of net additional office floorspace over the Plan period.
- The CPA supported changes made to the office policies to reflect the changing office market and the need for flexibility.
- A number of respondents supported the emphasis on flexible and adaptable office space to accommodate the needs of SME's, innovative and start-up companies.
- Tower Hamlets commented that office development in the City should be phased sensibly to ensure that it does not undermine the market for, and viability of, office and mixed-use development in other parts of the CAZ.
- The Golden Lane Estate Residents Association pointed to a need to examine how the City's economy and patterns of work may change following the pandemic.
- The Mayor of London indicated the Plan should seek to ensure there is sufficient capacity for last mile distribution, freight consolidation and related functions to support the needs of business.
- A few developers felt the City Corporation should take a more flexible approach to enabling vacant unviable office stock to be brought back into an economic generating use. For instance, the 12-month marketing period for loss of office floorspace would hinder flexibility and Policy OF2 should be reworded to allow for the loss of office space to be demonstrated either through marketing or viability evidence, but not both.
- A couple of respondents highlighted a need to secure affordable workspaces and to support creative uses.
- British Land commented that affordable workspace should not be limited to below market rents and should also be assessed with regard to lease lengths, fit out and service provision, taking into account the total cost of occupancy.
- The CPA expressed support for meanwhile use of vacant commercial, business and service buildings as well as offices, which will assist the growth of cultural facilities and creative industries.

- A student housing provider argued that when determining loss of office floorspace, purpose-built student housing ought to be included as an appropriate form of residential accommodation in or near residential areas

## **Retailing**

There were only 10 representations relating to the policies in this section of the Plan, albeit issues relating to retail provision were sometimes included in more general comments or in comments relating to individual Key Areas of Change. The following main points were raised:

- The CPA expressed concern that the policies are too prescriptive. Many existing retail uses are now in Class E use and more flexibility is required. The retail industry is in transition and policies need to reflect this. In this context, the CPA commented it is unclear why a Retail Impact Assessment is required for schemes promoting over 2,500 sqm of floorspace.
- The CPA and a couple of other respondents pointed to the importance of active frontages as a policy ambition.
- An individual respondent commented that increased retail growth may be optimistic due to increased home working and less visitors.
- A business commented that opportunities for retail growth outside the Principal Shopping Centre's (PSCs) and Retail Links should be recognised and promoted.
- Another respondent expressed support for the encouragement of town centre uses and active frontages across the City as long as these do not detract from the viability of core retail areas. The Plan could encourage the development of new business models and improve the leisure and entertainment offer for visitors.
- A traders' group expressed support for the policy relating to protection of specialist retail uses but suggested minor changes for clarity.
- The Smithfield Market Tenants Association highlighted that Policy RE5: Markets neglects to mention Smithfield Market.

## **Culture, Visitors, and the Night-Time Economy**

There were just under 50 representations on this section of the Plan, which raised the following main points:

- There was strong support for the City Plan's cultural aspirations from a number of arts organisations and from the CPA/other business respondents.
- The requirement for developers to submit Cultural Plans as part of planning applications for major developments attracted broad support, including from the Museum of London and the Arts Council. One respondent felt it could be transformational for the City in the long term, while another indicated that the policy should go further and consider specific quotas/metrics.
- While supportive of Cultural Plans in principle, the CPA suggested that CIL and s106 contributions are more appropriate than on-site cultural provision for some developments, while British Land highlighted the need for a proportionate cultural offer depending on the scale and nature of the development in question.
- A couple of respondents highlighted the need for future development on the Museum of London site to include cultural uses.
- There was a divergence of views on the night-time economy. The Mayor of London suggested a commitment in the draft Plan to develop a vision for the night-time economy to support its growth and diversification, while Tower Hamlets commented that the City should provide more explicit support for the expansion of night-time economy uses within appropriate areas. A few other respondents argued that businesses will be attracted to the City if it remains vibrant at night.
- However, the Barbican Association highlighted a spatial clash between the Northwest of the City being its biggest residential area, with more housing planned, and the site of the City's major cultural offer, with more 24-hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash.
- The Golden Lane Estate Residents Association also sought clarification on how the cultural and night-life ambitions are to be integrated with the needs of residents.
- The Barbican Association suggested policy wording changes including a statement that new or extended evening and night-time entertainment and related uses will not be permitted adjacent to residential clusters.
- A few respondents commented that these policies could go further on diversity and inclusion, for instance by providing welcoming spaces for more diverse communities and encouraging public art from a diverse range of artists.
- The CPA welcomed changes made to the hotels policy which provided additional flexibility and a hotel operator, while broadly supportive, felt that the requirement for complementary facilities accessible to the public should be applied flexibly on a case by case basis.

## Smart Infrastructure and Utilities

There were only 6 representations on this section of the Plan, which raised the following main points:

- Could the Plan set out how it will strengthen wider shifts towards electric transport and heating as part of the transition to a low carbon society.
- Text should be included to indicate that if infrastructure connections are unknown at application stage, planning conditions or obligations will be used to secure such detail.
- The City Corporation should support existing offices as well as new developments to access super-fast fibre broadband, wireless, 5G etc. to avoid two track technology office spaces.
- It is unclear whether the intention is to require developers to connect the construction site to the electricity grid or require the use of emission free power sources.
- Financial penalties should be used to ensure compliance.

## Design

There were approximately 190 representations on the policies in this section of the Plan. The reason for the relatively high response rate was that there were multiple comments suggesting identical changes to the supporting text of Policy DE1: Sustainability Standards and to the wording of Policy DE3: Public Realm. The main points are summarised below:

- The CPA expressed concern about the requirement for internal access through development sites as a matter of principle due to design and security issues which mean it is often not feasible or viable.
- There were mixed views regarding the provision of public open spaces at upper levels. Some respondents were supportive (e.g. referring to 'Parks in the Sky') but others pointed to the practical difficulties or to adverse impacts on residential amenity and biodiversity.
- The CPA and some other business respondents indicated concern about the requirement for free to enter roof terraces and spaces as part of all tall building or major developments as these should only be sought in appropriate circumstances.
- The CPA and an individual questioned if the requirement for a 'world class standard of design' is measurable?
- The Barbican Association argued that a Design Review Panel is necessary to ensure that all developments meet the highest standards of urban design.
- Historic England commented that the design policies do not address the effect of development on the setting of heritage assets or cross-boundary impacts.

- Developers must provide a robust justification for demolition and explain why they are not retrofitting or refurbishing an existing building and there should be a requirement for a Whole Life Carbon Assessment for all development over 10 dwellings or greater than 1,000 sqm in size (there were around 20 representations from individuals on this point).
- The CPA commented that emphasis should be placed on new and innovative technologies to achieve shared sustainability goals, and that carbon offsetting strategies should be developed in the City given the constrained setting.
- Policy DE3 should include additional wording to highlight the importance of avoiding overshadowing, restriction of sky view and overlooking by other buildings that would compromise the useability and function of the space (there were around 80 representations on this point, related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue).
- The Barbican Association indicated concern that developers are 'gaming' the daylight and sunlight policy requirements and that it isn't clear how cumulative impacts will be assessed.
- Friends of City Gardens highlighted that the impact of lighting schemes on biodiversity (particularly bats) needs to be taken into account.

## **Vehicular Transport and Servicing**

There were approximately 40 representations on this section of the Plan, with the main points raised being:

- TfL expressed support for changes made since consultation on the draft City Plan but noted that the 'London Access Streets' in Figure 13 do not fully reflect the Transport for London Road Network.
- A few respondents supported the policy seeking step free access at rail and underground stations and river piers, but an individual noted no evidence that the City Corporation is prioritising this.
- The CPA observed that it is unclear if transport assessments and travel plans thresholds in Policy VT1 relate to total floorspace, unit numbers or net additional floorspace.
- British Land observed that Policy VT2 does not consider multiple buildings that are in single ownership where common procurement methods or preferred supplier schemes can effectively reduce the number of delivery trips
- The CPA supported the intent of freight consolidation but noted it is not always possible to align delivery and servicing arrangements with adjoining owners.

- A business commented that the policy approach to re-timing of deliveries outside peak periods contradicts the terms agreed for a recent development near a residential area - clarification is required.
- It was commented that greater use of the Thames must respect the need to reduce emissions from riverboats to acceptable levels.
- It was suggested that paper shredding on-street be prohibited as it produces excessive noise and air pollution.
- A couple of respondents felt that the parking policy fails to recognise the needs of residents with limited mobility noting there is no provision for disabled visitors to park without risk of fines.
- Support was expressed for EV charging points.

## **Active Travel and Healthy Streets**

There were approximately 20 representations on this section of the Plan, with the main points raised being:

- TfL supported the change of title to Active Travel as this encompasses a greater range of healthy, active modes of travel but expressed disappointment that there is no mention of TfL's cycle hire scheme as a way to promote cycling considering how well it is used in the City of London.
- A business commented that by reducing road space to make way for more cycle and pedestrian routes, care needs to be taken to avoid creating vehicular congestion and hindering deliveries.
- Network Rail expressed support for improvement of access routes and public realm around stations – City Thameslink and Cannon Street are examples of stations which could benefit from such improvements.
- The CPA indicated concern about the blanket requirement to provide pedestrian routes through new developments as there will be occasions where this is not appropriate.
- Tower Hamlets and another respondent indicated the City Corporation should work with neighbouring boroughs to enhance key pedestrian and cycle routes that cross borough boundaries
- It was suggested that the City Corporation should work with Network Rail and TfL to provide large-scale secure cycle parking at rail stations and other key locations.
- A student housing provider argued that the London Plan cycle parking standards for student accommodation will result in over-provision and thereby reduce the efficient use of land. Part of the requirement could be provided as pool bikes.
- A business argued that where London Plan short stay cycle parking requirements cannot be met, the City Plan's requirement for an

additional 25% long stay cycle parking spaces is unlikely to be feasible in most cases and should be removed.

## Historic Environment

There were around 200 representations on the policies in this section of the Plan, the majority of which comprised comments suggesting identical changes to Strategic Policy S11 and Policy HE1: Managing Change to Heritage Assets. The main points are summarised below:

- A number of individuals and organisations highlighted the historical, architectural, cultural and spiritual significance of Bevis Marks Synagogue to the City and to the Jewish community, calling for the City Plan to recognise this significance and to implement specific protections for it.
- While supporting Policy S11, additional wording was suggested to indicate that considerations in relation to heritage assets and their settings will be given full weight in all planning decision-making (around 80 largely identical representations were received supporting the concerns of the London Sephardi Trust and the Spanish and Portuguese Sephardi Community about the potential impact of tall buildings on Bevis Marks Synagogue).
- While supporting Policy HE1, additional wording was suggested to clarify that heritage assessments should be detailed and prepared by an appropriately qualified expert, and that proposed development which does not conserve and enhance heritage assets and their settings will be resisted (as above, around 80 largely identical representations were received on this point).
- Historic England sought reference to the overall setting of the Tower of London World Heritage Site (WHS) in Policy S11 rather than being restricted to the local setting.
- The Mayor of London supported the requirement for heritage assessments in Policy HE1 but requested inclusion of a similar requirement in Policy HE3 relating to development with the potential to affect the Tower of London WHS or its setting.
- The CPA considered that Policies S11 and HE1 do not fully reflect the NPPF in terms of harm and benefits or reflect case law that has established principles about the balance to be applied.
- Tower Hamlets stated a need to acknowledge the importance of the settings of conservation areas and that development outside of conservation areas can have an impact on their character and significance.
- The Diocese of London highlighted that the significance of the dome of St Paul's on the City's skyline is more than simply maintaining a historic vista.



- The Surveyor to the Fabric of St Paul's expressed concern about inadequate drafting of Policy HE1, for instance in terms of defining the wider setting of heritage assets, and a lack of precision in relation to harms and benefits weighting. There is no definition of or recognition of the 'iconic value' of St Paul's to the City.
- The Victorian Society were concerned by the lack of reference in the City Plan to existing and future Conservation Area Character Summary and Management Strategy SPDs
- An individual respondent argued that the City Corporation should publish a list of non-designated heritage assets and not merely rely on ad hoc identification in the planning process.
- SAVE Britain's Heritage proposed wording highlighting that heritage should be brought to more diverse audiences in a way that is socially and economically inclusive.
- Friends of City Gardens commented that account should be taken of the biodiversity value of historic assets, such as walls and tombstones.

## **Tall Buildings**

Approximately 100 representations were received on this policy, a large majority of which related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue. The key points raised were:

- The Mayor of London considered that the policy approach in the City Plan, which defines inappropriate areas for tall buildings, leaves uncertainty regarding the status of other parts of the City. The London Plan 2021 states that tall buildings should only be developed in locations identified as suitable in development plans and requires boroughs to identify any such locations along with appropriate tall building heights. The Mayor considers that, as currently written, the draft City Plan is not in general conformity with the London Plan.
- Historic England welcomed amendments to the policy since the previous draft but highlighted that fundamental concerns regarding ambiguity remain. Adopting an approach that only maps out areas inappropriate for tall buildings infers that elsewhere they may be appropriate leading to a potential risk of harmful proposals coming forward.
- Concern was expressed that the policy gives greater weight to the need for additional tall buildings over other important planning objectives, notably conserving and enhancing heritage assets and their settings (around 80 largely identical representations were received supporting the concerns of the London Sephardi Trust and the Spanish and Portuguese Sephardi Community on this point).



- Bevis Marks Synagogue as a Grade I Listed Building warrants similar protection as that provided for St Paul's, the Tower of London and the Monument, and that this protection should be secured by an appropriate designation on the Proposals Map (as above, around 80 largely identical representations were received on this point).
- Historic Royal Palaces advocated that Figure 21 showing areas inappropriate for tall buildings should take account of LVMF views 10A.1 from Tower Bridge and 25A.2&3 from the South Bank.
- The Surveyor to the Fabric of St Paul's noted that the digital model was not included in the evidence base for the City Plan, arguing that it should be added so that decision-making is transparent with reference to an agreed model on which harms and benefits can be judged.
- Tower Hamlets advocated amending the definition of tall buildings to ensure that all buildings that are tall relative to their context, are assessed as such. It should be acknowledged that buildings below 75m could also have significant impacts on protected views.
- A business respondent suggested that the definition of a tall building in the City Cluster should be higher than other areas in the City. A tall building proposal located in a conservation area that preserves the heritage significance of nearby heritage assets and meets other relevant policy objectives should be considered acceptable.
- The CPA pointed to circumstances where it is not feasible, practical or viable to provide publicly accessible open space or other facilities at upper levels and there may be instances where other benefits, e.g. education, cultural, or affordable workspace, need to be prioritised over this provision.
- A few respondents requested that the area around the Barbican and Golden Lane / the Smithfield and Barbican Key Area of Change be confirmed as inappropriate for new tall buildings and Figure 21 amended accordingly.

## Protected Views

Just over 80 representations were received on this policy, almost all of which related to concerns about the potential impact of tall buildings on Bevis Marks Synagogue.

- The London Sephardi Trust and the Spanish and Portuguese Sephardi Community proposed additional wording to this policy to bring it into line with their suggested rewording of S12, i.e. to protect sky views from the curtilage of Bevis Marks Synagogue (around 80 largely identical representations were received supporting this point).

- Lambeth noted that Strategic Policy S13 does not acknowledge the existence of views into the City designated by other boroughs, often at the request of the City Corporation in the past and requested that this be addressed through additional wording.
- Tower Hamlets advocated the inclusion of the LVMF river prospect from Tower Bridge (View 10A.1) within Figure 22 and reference to Tower Bridge as a strategically important landmark.

## **Open Spaces and Green Infrastructure**

There were just over 50 representations on this section of the Plan, with the main points raised being:

- Broad support for the policies in this section, particularly the emphasis given to the role of planning in helping to 'green the City'. Support was expressed by the Mayor of London, amenity groups, businesses and individual members of the public.
- Some respondents highlighted the importance of maintenance to the success of these policies, while reference was also made to the need for quantifiable targets and timescales and post-completion monitoring on new developments.
- Friends of City Gardens highlighted the need for greening to be more than a fig leaf and for high quality and species-specific interventions as well as more green space for the public. They also questioned whether there are sufficient resources to monitor and evaluate biodiversity benefits and make sure they are substantive, effective and resilient.
- The CPA requested more flexibility in Policy OS1 relating to open spaces, arguing that it is not justified to secure access to existing private spaces, nor is it appropriate to seek to secure access to all private spaces within new developments.
- The introduction of an Urban Greening Factor (UGF) was broadly welcomed, including by the CPA and other business respondents, although the CPA felt there needs to be flexibility to take account of particular circumstances of sites, particularly where roof space is constrained or can better serve other priorities in the Plan.
- A couple of respondents advocated that the maximum attainable UGF for each development should be the goal rather than a generic threshold.
- Changes made to Policy OS3 on biodiversity since the previous draft were supported, particularly the reference to Biodiversity Net Gain (BNG), although more details were sought on how BNG will be implemented.
- Suggestions included production of Habitat Action Plans for target species of biodiversity importance in the City, and greater protection of

biodiversity within Site of Importance for Nature Conservation (SINCs) through the production of management plans incorporated into SPDs.

- The new policy on Trees (OS4) was welcomed. The Woodland Trust suggested some refinements, including adoption of a target to increase the number of trees and their overall canopy cover by at least 10%.

## **Climate Resilience and Flood Risk**

There were 17 representations on this section of the Plan, with the main points raised being:

- The Environment Agency were supportive of revisions made to policies CR2 and CR4 (relating to flood risk and flood protection and flood defences) since the previous draft Plan.
- Thames Water were supportive of Policy CR3: Sustainable Drainage Systems (SuDS) including the requirement for developers to liaise with them early in the design process.
- While recognising the merits of SuDS measures, the CPA suggested an amendment to take a proportional response by focusing on major developments, arguing that a change of use application for example cannot reasonably implement SUDS measures.
- Friends of City Gardens strongly supported the SuDS policy.
- A couple of respondents noted the concept of blue roofs is mentioned in this section and suggested the benefits of blue roofs could be promoted more extensively in the City Plan.

## **Circular Economy and Waste**

There were 16 representations on this section of the Plan, with the main points raised being:

- The Mayor of London supported the general policy approach and the requirement for circular economy statements to be submitted for all major and EIA development proposals.
- The Mayor suggested an amendment to clarify that construction and demolition waste contribute towards the net self-sufficiency target for London, and encouraged the City Corporation to seek further opportunities within London for the management of its waste through collaborative working with other boroughs.
- TfL commented that there is limited detail on the transport of waste, including the types of waste and quantities transported by river barges and whether this is likely to change in the future.
- A respondent sought further clarity on expectations for the re-use of materials, building refurbishment and the application of Circular Economy principles.

- Other comments included reference to the need to reduce the amount of food waste and encouragement for use of both rail and water to transport waste.

## **Key Areas of Change (KAoCs)**

A small number of general comments about the KAoCs were received:

- TfL were supportive of further guidance for particular KAoCs, adding this would be an ideal opportunity to promote sensitive approaches to walking, cycling, highway safety and public realm.
- Tower Hamlets supported the principles of the KAoCs but suggested that the City Corporation should reconsider the inclusion of site allocations to ensure that development on strategic sites comes forward in a manner that is sustainable and includes the necessary supporting infrastructure.
- The Victorian Society requested reference to the Conservation Area Character Summary and Management Strategy SPDs, which would go some way to ensuring that the predicted change in these key areas be informed at a strategic level by a shared understanding of the historic environment.

## **Thames Policy Area**

There were 8 representations on this policy, which raised few significant issues:

- There was support for the proposed policy approach, including from the Port of London Authority (PLA) and from the Mayor who welcomed the continued safeguarding of Walbrook Wharf.
- In relation to the policy requirement for publicly accessible roof terraces, the CPA commented that in addition to the potential exceptions cited there may be site specific instances where this is not practical or viable.
- A recommendation was made to refer to the GLA/PLA Case for a River Thames Cultural Vision, which was launched in 2019.

## **Blackfriars**

Only one representation was received, which made suggestions to improve the quality of accompanying Figure 30 (similar suggestions were made in relation to illustrations used throughout the Plan).

## **Pool of London**

There were 5 representations on this policy, which raised the following main points:

- Representations on behalf of a business with a long lease holding in the area expressed general support for the proposed policy direction but advocated some changes to the policy wording including reference to preservation 'or' (rather than 'and') enhancement of heritage assets; omission of specific reference to 'river' frontages; and the qualification 'where appropriate' in relation to seeking additional public space and play facilities.
- SAVE Britain's Heritage proposed wording highlighting that heritage should be brought to more diverse audiences in a way that is socially and economically inclusive.
- An individual respondent expressed concerns regarding the area shown as "Renewal Opportunity Sites" on Figure 31 as the three buildings identified need to be protected.

### **Aldgate, Tower and Portsoken**

There were 5 representations on this policy, which raised the following main points:

- Historic Royal Palaces requested clarification that this area of the City is inappropriate for tall buildings in accordance with Figure 21 in the Plan.
- TfL, in its capacity as a landowner in the area, supported a change made since the previous draft which refers to enabling residential development in appropriate locations.
- Tower Hamlets expressed support for the City's policy approach within this area and a desire to continue to work closely on the development of the joint cluster of offices, hotels and housing that sits on either side of the boundary.

### **City Cluster**

Approximately 90 representations were received on this policy and the main points are outlined below:

- To address the general conformity issues in relation to tall buildings, the Mayor of London recommended identifying and clearly mapping in principle acceptable locations for tall buildings, along with appropriate maximum heights. This is especially important in relation to the eastern and southern edges of the City Cluster where there are potential negative impacts on the Tower of London WHS.

- Historic England stated that it does not consider this policy to conform with either the NPPF or the 2021 London Plan. To ensure that future development in the Cluster does not cause harm to the significance of the historic environment, greater clarity is required as to building heights and locations for potential tall buildings proposals.
- The London Sephardi Trust and the Spanish and Portuguese Sephardi Community welcomed the statement that tall buildings "should make a positive contribution to the City's skyline, preserving heritage assets and settings..." (around 80 largely identical representations were received supporting this point).
- Historic Royal Palaces commented that without clarity on building heights, there is no way of knowing what the impacts would be on the Tower of London WHS of the southern expansion of the Cluster to include 20 Fenchurch Street. HRP advocated that the 'Renewal Opportunity Sites' identified in Figure 33 should be allocated in the Plan and the policies for these should identify potentially affected heritage assets and how their significance may be affected.
- The Diocese of London sought reassurances in the policy that the Cluster will rise to a central peak approximating to the established height but stepping down uniformly to a more respectful scale at its perimeter. This will help ensure that the view of St Paul's does not become 'blinker' over time diminishing its international status as a City landmark.
- The Surveyor to the Fabric of St Paul's observed that there is reference to the 'shape' of the Cluster, but details are not set out in the evidence base. This raised questions about how this had been arrived at, which stakeholders have inputted into it and how the wider setting of the Cathedral has informed it.
- Another respondent referred to recent planning application approvals and recommendations that apparently run counter to the policy aims, not least in the context of the Tower of London WHS and its Local Setting Area.
- A few business respondents welcomed the continued support of significant growth in office floorspace within the City Cluster, with one requesting specific reference to opportunities for enhancement of Leadenhall Market in tandem with the objective to accommodate significant additional office floorspace.
- A suggestion was made that streetscape enhancements in the area should strengthen connections to the river and improve the 'gateway experience' of entering the Cluster from the south.

## **Fleet Street and Ludgate**

There were 4 representations on this policy, which raised the following main points:

- The Fleet Street Quarter Partnership advocated a more radical and dynamic consideration of this area, arguing that the City Plan has to embrace the historic landscape of the Fleet Street area but also has to be innovative and creative in how it puts a modern layer on this. The Partnership set out a range of ideas on how Fleet Street could evolve, including giving it a new identity as a Tech and Legal hub by creating a Tech Quarter specialising in cyber security services.
- The Surveyor to the Fabric of St Paul's noted that there is no policy for St Paul's and considered this a significant oversight for a building and wider setting of such importance. It was suggested that the Fleet Street and Ludgate Key Area of Change should be expanded to include the area all around the cathedral, because that is required to effectively achieve the objectives of the policy.

### **Smithfield and Barbican**

There were approximately 30 comments on this section of the Plan. The main points raised are outlined below:

- There was support for the Culture Mile proposals from some arts organisations and business respondents, while the Mayor welcomed Culture Mile as being in line with London Plan policy which encourages boroughs to identify, protect and enhance strategic clusters of cultural attractions.
- The Smithfield Market Tenants' Association (SMTA) argued that the City Plan must safeguard the Smithfield Markets in perpetuity unless a suitable alternative location can be agreed with the SMTA. It commented that no evidence has been put forward by the City Corporation indicating that Market use is unviable in the long term and that the 'use' contributes to the heritage value of the site as well as the built fabric. In the SMTA's view, consideration of future and alternative uses is premature whilst the Markets remain operational and protected by law.
- The Barbican Association felt that locating vibrant cultural uses in Smithfield would help both to give an identity to Culture Mile and to preserve the amenity of the large residential clusters of the Barbican and Golden Lane estates.
- Barts Heritage requested recognition of its proposals to revitalise the historic North Wing and Square at St Bartholomew's Hospital as a pioneering example of how health and heritage can be drawn together.
- New London Architecture (NLA) requested to be added to the list of cultural organisations who can make a contribution to Culture Mile, potentially through the creation of a centre of excellence for the built



environment which would provide space for innovation, for start-ups and incubation.

- The Surveyor to the Fabric of St Paul's indicated that Chapter would welcome the opportunity to be involved in the development of routes and wayfinding between Culture Mile and the rest of the City.
- The Barbican Association expressed surprise at the lack of specific sites for further housing given that this area already has the largest clusters of housing in the City and the policy in the Plan of siting new housing next to existing clusters.
- Friends of City Gardens expressed concern regarding the omission of the Rotunda Garden from Policy S25 given that it is one of the few green spaces in this area and should be protected.
- It was commented that there should be greater acknowledgement of the unique character and heritage of the area.

## **Liverpool Street**

There were 6 representations on this policy, with the main points arising outlined below:

- Network Rail stated that it appreciates the aspirations of this policy in relation to accessibility and capacity improvements at Liverpool Street Station. It will continue to work with the City Corporation and relevant partners and stakeholders with a view to identifying and delivering enhancement opportunities. Network Rail has produced a Liverpool Street Station vision document outlining its future vision and strategy for the station.
- British Land expressed support for the proposed enhancement of the area around Liverpool Street Station and the initiatives within the policy, which are aligned with its Broadgate Vision. Amendments were suggested to the wording of the supporting text relating to transport and public realm improvements.
- TfL indicated that it is pleased the development of walking routes within and around Liverpool Street station have been considered in respect of the Elizabeth line opening.
- Tower Hamlets highlighted that Liverpool Street is identified in the London Plan as an area with more than local significance to the night-time economy and plays an important role in supporting the adjacent night-time economy centres at Shoreditch and Brick Lane, including providing public transport access via the night tube. The City Plan should acknowledge this role and the City Corporation should work with neighbouring boroughs to manage and enhance it.

## **Planning Contributions**



There was only one representation on this section of the Plan, from TfL who requested that bus capacity upgrades and s106 contributions towards cycle hire infrastructure should be included.

## **Whole Plan/General Comments**

There were approximately 50 further representations that did not relate to specific policies or proposals but made general comments, some of which expressed support while others focused on areas of weakness or omissions. In some cases, these representations related to the wider context within which the City Plan has been prepared or to aspects of the supporting evidence base.

An outline of the main issues raised is set out below:

- Several respondents expressed support for the City Plan, citing elements such as its emphasis on greening and combatting climate change. The draft Plan was particularly strongly supported by arts and cultural organisations for its vision to create a vibrant cultural quarter in the northwest of the City.
- The CPA welcomed the vision and ambition of the Plan to help drive the City's recovery and sustainable growth over the next 15 years, while TfL felt that it integrated various important transport considerations well.
- However, some felt that it had been overtaken by events, with the Barbican Association querying whether it was already out of date. The Fleet Street Quarter Partnership commented on the need to think outside of the box and that the pandemic presented a rare opportunity for the City Corporation to press the reset button and to move the City positively ahead to ensure that it remains an attractive destination.
- A few individual respondents expressed opposition to the Plan's growth ambitions citing concerns about the impact of continual redevelopment on the character of the Square Mile. Others felt that the Plan was too passive in places by 'encouraging' developers rather than putting down clear boundaries and/or that it was too ambiguous.
- The Barbican Association observed that the draft Plan sought to fulfil a number of sometimes conflicting objectives without recognising the inherent tension between them or providing a framework to manage the conflict. Healthwatch City of London also commented on the lack of detail on how competing objectives will be met, noting that many of the priorities compete for the same attention and limited space.
- Some representations raised implementation issues. The Barbican Association and the Golden Lane Estate Residents' Association expressed concerns regarding the City Corporation's decision-making process on planning applications. Friends of City Gardens queried whether the City Corporation has sufficient resources to adequately evaluate, monitor and enforce high ecological standards.

- Aspects of the supporting evidence base were criticised by some stakeholders, especially from the heritage sector. Historic England commented that there remains work to be done to ensure there is a comprehensive evidence base in place in relation to the historic environment that has informed and helped shape relevant policies. The Surveyor to the Fabric of St Paul's Cathedral noted a lack of evidence relating to heritage protection for St Paul's, while the Victorian Society noted that the existing Conservation Area Character Summary and Management Strategy SPDs are increasingly out of date. Sport England also commented on an absence of evidence relating to indoor and outdoor sport facilities.
- Finally, the indicative nature of many of the draft Plan's maps/illustrations and the lack of precision was criticised by a couple of respondents.

### **Stage 3 - Proposed Submission City Plan 2036 Consultation Response**

**Appendix 6 – Proposed Submission City Plan 2036 Responses:** lists the comments made in response to the consultation for the Proposed Submission Draft City Plan 2036, together with the City Corporation's response indicating how these comments have been reflected in the Revised Proposed Submission Draft City Plan 2040. Copies of the full comments are available for inspection on request.

## 4. Stage 4 - Informal engagement to inform City Plan 2040 (2023)

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### Introduction

The Local Plan has been informed by three previous rounds of stakeholder engagement, in 2016 (Issues and Options Regulation 18), in 2018/19 (Draft Local Plan) and again in March 2021, when a full draft of the emerging Local Plan was published for Regulation 19 consultation prior to the submission to the Secretary of State.

A number of significant developments have happened since the previous consultation rounds which need to be considered. These include changes to the national planning policy framework and planning legislation; the adoption of a new London Plan in 2021; City Corporation's strong focus on the Destination City initiative to maintain its status as a global destination; and a commitment to achieving net zero emissions by 2040 through the implementation of the Climate Action Strategy and other planning guidance.

The City Corporation commissioned the LDN Collective to work with them to design and deliver a stakeholder engagement programme to inform the next version of the City Plan, ensuring that the City Plan 2040 focusses on the right priorities and considers the things that matter to people the most, including the City residents and visitors, and City workers.

In June and July 2023, an informal consultation was organised, involving eleven public workshops that focussed on specific topics and the seven key areas of the City that are likely to experience the most change. Online engagement through the Planning Division's Commonplace platform was also carried out.

Following is the list of workshops that were organised:

- **Topic Workshops**
  - Creating a healthy and inclusive city
  - The future needs of offices
  - Developing tall buildings in an Historic city
  - Destination City and Culture
  - Retrofitting and creating a sustainable future
- **Key Areas of Change Workshops**
  - Fleet Street & Ludgate
  - Smithfield and Barbican
  - Thames Riverside, Pool of London and Blackfriars
  - City Cluster and Liverpool Street
  - Aldgate, Tower and Portsoken

## Consultation methods

An email informing about the City Plan engagement was sent to consultees registered on the planning policy consultation database. Additionally, a separate email was sent to key stakeholders, which included business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations. Consultees were invited to participate in the engagement workshops, and sign-up to Commonplace to participate in the online consultation and receive future project updates.

The consultees invited to make representations included:

- specific consultation bodies comprising various statutory authorities;
- general consultation bodies, including organisations with an interest in City planning, such as business and residents' groups, amenity groups, civic groups, cultural organisations, places of worship and voluntary organisations.
- key stakeholders relating to specific topic areas and key areas
- those individuals and organisations registered on the City Corporation's planning policy consultation database

The City Plan Commonplace website provided detailed information on the proposed plans for key areas, as well as updates on the current progress and instructions on how to participate and engage in the process. Furthermore, all information regarding the City Plan consultation was available on the City Corporation's website.

Member notification - a direct email notification was sent to all Common Council Members, informing them about the consultation and encouraging them to promote it within their respective wards through their established networks. Additionally, the City Plan consultation information was included in the May and June Members briefing.

News coverage – Further publicity and press releases through City Resident May, City AM, City Matters, E -shot and Fleet street Newsletter May.

Social media – regular posts about the City Plan engagement were shared on LinkedIn, Twitter and Facebook.

## Events and meetings

Officers of the Department of the Built Environment attended the following workshops to explain the consultation, promote discussion and receive comments:

<b>Topic workshop</b>	<b>Date</b>	<b>Time</b>	<b>Location</b>
Creating a Healthy and Inclusive City	12 <sup>th</sup> June	17:00-18:30 pm	The London Centre, 3 Aldermanbury, London EC2V 7HH
The Future needs of Offices	15 <sup>th</sup> June	17:00-18:30 pm	The London Centre, 3 Aldermanbury, London EC2V 7HH
Developing Tall Buildings in an Historic City	26 <sup>th</sup> June	17:00-18:30 pm	The London Centre, 3 Aldermanbury, London EC2V 7HH
Destination City and Culture	27 <sup>th</sup> June	17:00-18:30 pm	The London Centre, 3 Aldermanbury, London EC2V 7HH
Creating a Sustainable future	29 <sup>th</sup> June	17:00-18:30 pm	The London Centre, 3 Aldermanbury, London EC2V 7HH
<b>Area workshop</b>	<b>Date</b>	<b>Time</b>	<b>Location</b>
Fleet Street and Ludgate	8 <sup>th</sup> June	12:00-13:30 pm	Peterborough Court Marketing Suite, 135-151 Fleet Street, London EC4A 2BB
Smithfield and Barbican	13 <sup>th</sup> June	17:00-18:30 pm	Great St Bartholomew Church, Cloth Fair, London EC1A 7JQ
Thames riverside, Pool of London and Blackfriars	03 <sup>th</sup> August	12:15-13:45 pm	Online
City Cluster and Liverpool Street	21 <sup>th</sup> June	12:00-13:30 pm	Etc. Venues, 8 Fenchurch Place, London ECM 4PB
Aldgate, Tower and Portsoken	22 <sup>th</sup> June	17:00-18:30 pm 12:15-13:45 pm	City Wall at Vine Street, 12 Jewry St, London EC3N 2HT
	15 <sup>th</sup> August		Artizan Street Library, London E17AF

## Summary of key issues

### Creating a Healthy and Inclusive City

This session explored the potential and challenges for the City's streets and open spaces. Participants identified the following priorities for the revised City Plan:

- Greater provision and quality of publicly accessible open space at ground level; places to relax, rest and spend time – especially near the Thames;
- More roof gardens, ensuring they are inclusive and welcoming for all;
- More childcare, school and health facilities;
- Better quality and greater access to play space, particularly near residential areas and near attractions for families;
- To ensure suicide prevention measures are incorporated into the design of high level spaces;
- To address overcrowded streets and spaces;
- To encourage temporary events, exhibitions, pop-up activities and street markets;
- To create a greener public realm;
- To improve cycle parking, particularly near busy areas.

### The Future of Office Needs

This session explored how the qualitative and quantitative demand for office floorspace has changed and is likely to influence office supply over coming years. Participants identified the following priorities for the revised City Plan:

- The need to address challenges faced by grade B office stock, potentially allowing greater flexibility to change use;
- Finding the right balance in meeting demand, seeking to meet future office demand in sustainable ways;
- Opening up office lobbies and making them more welcoming spaces that contribute to the life of the City;
- Make better use of empty shops, particularly when affected by office developments;
- Ensure the City has high quality public realm and leisure and cultural facilities, reflecting the standing of the Square Mile as a world-class office location.

### Tall buildings in a Historic City

This session explored how the City Plan's tall buildings approach can reflect the requirements of the London Plan; how to strike a balance between the development of tall buildings and the impacts on historic buildings and areas; and how tall buildings can positively contribute to the Square Mile.

Participants identified the following priorities for the revised City Plan:



- The need to minimise harm to heritage assets;
- The need to celebrate our heritage and the City's hidden gems;
- Need for tall buildings to have good quality public realm around them;
- The juxtaposition of old and new and different styles remaining a key part of the Square Mile's character;
- A greater variety of public experiences in tall buildings;
- Using tall building clusters to deliver greater sustainability benefits;
- The need to ensure appropriate flexibility over the precise height of tall buildings while giving clarity over suitable heights.

## **Culture and Destination City**

This session explored the role of cultural attractions in the City, and the way that development can help to create a 'Destination City' for the Square Mile. Participants identified the following priorities for the revised City Plan:

- The need to celebrate the City's hidden gems;
- Encouraging an active street culture, with public spaces that have markets, spill-out space, events and activities;
- Make more of the north bank of the Thames;
- Ensure we have the right facilities and complementary uses – public toilets, open spaces, food and drink – to complement cultural and leisure offers;
- Clear signs and wayfinding, and inclusive approaches to public welcome, particularly for spaces accessed through buildings such as roof terraces.

## **Creating a Sustainable Future**

This session explored how development in the City can assist in meeting our net zero targets and enable the City to adapt to the changing climate. Participants identified the following priorities for the revised City Plan:

- The need to shift the culture away from 'demolition first' to 'retrofit first';
- Promoting retrofit while recognising that this may not be feasible for all buildings;
- Explore change of use to incentivise retrofit, while ensuring this doesn't result in low quality conversions;
- Prioritise long-term planning for sustainable power and energy infrastructure;
- Ensure new buildings can be adapted and updated in the long term, reducing the need for future demolition.

## **Key Areas of Change**

Engagement sessions were held for the Key Areas of Change, exploring what people value about each area and how development can support positive change in each area. These are summarised in the table below:

Key Area of Change	Engagement feedback
City Cluster	<p>People value:</p> <ul style="list-style-type: none"> <li>• Leadenhall Market</li> <li>• City Skyline and views of and from tall buildings</li> <li>• Iconic architecture</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Reinvigorating Leadenhall Market</li> <li>• Capitalising on existing and emerging attractions and the area's connectivity</li> <li>• Creating improved public realm and walking and cycling routes</li> <li>• More active frontages</li> </ul>
Liverpool Street	<p>People value:</p> <ul style="list-style-type: none"> <li>• Liverpool Street station</li> <li>• Connectivity to other places</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Improvements to the public realm along Bishopsgate, particularly near the station entrance</li> <li>• Improvements to the arrival experience at Liverpool Street station</li> <li>• Safer streets, enhanced public realm and improved walking and cycling across the area</li> </ul>

Key Area of Change	Engagement feedback
Aldgate, Tower and Portsoken	<p>People value:</p> <ul style="list-style-type: none"> <li>• Green open spaces</li> <li>• Local shops</li> <li>• Housing</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Enhancements to the public realm</li> <li>• More places to sit, relax and socialise</li> <li>• Better cycling routes</li> <li>• More and improved play and open spaces</li> <li>• Ensuring new development doesn't unduly affect residential areas</li> <li>• Need for social infrastructure, particularly GP surgeries</li> <li>• Local shops to serve resident population</li> </ul>
Smithfield and Barbican	<p>People value:</p> <ul style="list-style-type: none"> <li>• Cultural uses and heritage</li> <li>• Green open spaces and biodiversity</li> <li>• Housing and the residential feel of parts of the area</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Better walking and cycling routes, including improvements to Beech Street</li> <li>• More places to relax, enjoy and spend time</li> <li>• Enhancing the area's culture offer, including its existing 'hidden gems' like St Bartholomew the Great</li> </ul>
Fleet Street and Ludgate	<p>People value:</p> <ul style="list-style-type: none"> <li>• The area's historic courts and alleys</li> <li>• The Fleet Street thoroughfare</li> <li>• The area's historic and cultural attractions</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Enhancing Fleet Street, creating more activity and reinvigorating the retail offer</li> <li>• Places to socialise and spend time</li> <li>• Better walking and cycling routes</li> <li>• Opportunities for meanwhile use</li> </ul>

Key Area of Change	Engagement feedback
Blackfriars	<p>People value:</p> <ul style="list-style-type: none"> <li>• Public space along the riverfront</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Generous public open spaces</li> <li>• Enhancements to the riverside walk</li> <li>• Improved connectivity to the riverside</li> <li>• Tackling the impermeability of the area and the unattractive character of many buildings</li> <li>• Exploring opportunities for the undercroft to the west of Blackfriars Bridge</li> </ul>
Pool of London	<p>People value:</p> <ul style="list-style-type: none"> <li>• The Thames riverside walk</li> </ul> <p>Priorities for change:</p> <ul style="list-style-type: none"> <li>• Enhancing the riverside walk</li> <li>• Creating inclusive public open spaces by the river</li> <li>• Improvements to walking and cycling in the area, especially the accessibility of the riverfront walk which is overly narrow in places</li> <li>• Need for improved retail, leisure and cultural offer</li> </ul>

#### Stage 4 - Revised Proposed Submission Draft City Plan 2040 - Representations received from Bevis Marks Synagogue

**Appendix 7:** includes representations received from Bevis Marks Synagogue in relation to the Draft City Plan Policy HE1 (managing change to the historic environment) and how it addresses the setting of the Synagogue.

## 5. Changes made from the City Plan 2036 (2021) to the City Plan 2040 (2024)

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This section summarises how the key issues raised during Regulation 19 consultation and the informal engagement in 2023 have been taken into account in the final stages of preparation of the City Plan 2040.

### Strategic priorities and Spatial Strategy

- These sections have been revised to take into account feedback received during consultation, providing a clearer set of strategic priorities, and a spatial strategy that reflects how strategic policies will affect different parts of the Square Mile.

### Health, Inclusion and Safety

- Added reference to suicide prevention (DE5) and jointly produced Suicide Prevention Guidance Note with Public Health Colleagues which details the implementation of the suicide prevention policy in the Plan.
- Strengthened references to mental health in S1 and throughout the Plan, including the role of culture and mental health.
- Strengthened references in S1 to inclusion, diversity and equality and in all relevant policies.
- Strengthened wording in HS3 on effects of light on residents and workers. Produced a Lighting SPD which details the implementation of the lighting policy in the Plan.
- Strengthened wording in HL8 on shared facilities for health and recreation.
- Strengthened wording in HL6 on protection, and replacement of social and community facilities.
- Strengthened wording in HL1 to ensure developers produce appropriate Design and Access Statements.
- Strengthened Policy SA2 highlighting the importance of making the City safe and secure from crime, fear of crime and anti-social behaviour; and addressing requirements of those who are more likely to experience lack of safety.
- Strengthened Policy SA 3 to ensure the design and location of HVM creates an inclusive and accessible public realm and doesn't undermine pedestrian permeability.

### Housing

- Built-in a clearer route in S3 for redundant offices to change use to residential in and near existing residential areas.
- Prioritised a range of tenures in and near residential areas such as co-living, build to rent, hostels as well as encouragement for affordable housing development in S3.

- Strengthened S1 to maximise value of affordable housing sites through the viability process.
- Added flexibility in HS2 to amalgamate two units to allow for retirement purposes.
- Reconfigured Temples TP1 to recognise need for flexibility of tenure and access requirements.

## **Offices**

- Revised policy OF2 to add a retrofit fast track approach to address the challenges faced by Grade B stock to allow for greater flexibility, including the loss of office floorspace within an identified residential area may be able to be changed into additional housing.
- Strengthened policy S4 to promote the retrofit of existing office buildings for office use and upgrades to environmental performance and quality of accommodation.
- Strengthened S4 to support spaces with different layouts and configurations to meet the needs of SMEs, start-up companies, creative industries.
- Revised supporting text under OF1 to outline how lobbies can be multifunctional spaces.
- Revised OF1 to encouraging provision of healthy and inclusive working environments that promote wellbeing.
- Revised OF3 to outline where a major development would impact existing ground floor or podium active uses, those units should be kept in active use for as long as possible prior to the development taking place.
- Strengthened OF1 to include affordable workspace.

## **Retail**

- Policies S5 and RE1 has been revised, informed by updated evidence, to encourage greater diversity of retail uses in the Principal Shopping Centres and other parts of the Square Mile, reflecting also the introduction of the Class E use class.
- Policy RE2 (Retail Links) has been deleted, and policy RE2 (active frontages) and RE3 (Specialist retail units and clusters) have been amended, having the effect of encouraging active frontages across the City and supporting clusters of retail that play an important role locally.

## **Culture and visitors**



- Significantly revised Policy S6 to reflect Destination City approach, and the City Corporation's priority to transform the Square Mile into a leading leisure and culture destination.
- Added a new Policy CV2 requiring major developments to deliver arts, leisure and culture facilities in accordance to the culture planning framework; requiring on-site culture or leisure provision from the largest schemes; and on-site, off-site or contributions from medium sized schemes.
- Strengthened CV4 to enable the creation of active frontages and provide public access to inclusive facilities such as co-working space, meeting rooms, cafes, restaurants or leisure.
- Strengthened CV4 to enable inclusive and welcoming hotel lobbies for all and encouraged large-scale hotels to provide public toilet facilities and provide 'cool spaces' that provide temporary respite during heat waves.
- Policy CV5 was revised to include the agent of change principle.

## **Infrastructure**

- Revised S7 to include "the transition towards a zero carbon and climate resilient city" when coordinating and facilitating infrastructure planning and delivery.
- Revised IN1 to include where it is not possible to provide detail at an application stage, planning conditions and/or obligations will be used to secure the provision of such detail.

## **Design**

- Policy S8 has been extensively revised, clarifying approaches to sustainable design and vibrancy in line with the City Corporation's renewed focus and priorities on climate change and becoming a destination city.
- Policy DE1 has been revised to highlight the 'Retrofit first' approach and the need to follow the City Corporation's Carbon Options Guidance and circular economy design approaches.
- Policy DE2 has been revised to place additional emphasis on creating inclusive spaces, active frontages, urban greening.
- Significantly revised Policy DE3 requiring developments to provide inclusive and accessible public realm.
- Amended Policy DE8 to refer to a broader range of sensitive receptors.

## **Transport**

- Revised AT3 to encourage cycling facilities to be conveniently located, easily accessible, safe and secure.

- Clarified VT1 to identify thresholds for transport assessments and travel plans.
- Revised VT2 to clarify timing of delivery and servicing that areas in proximity to sensitive land uses may be subject to further restrictions.
- Strengthened VT2 to ensure that on-street shredding will not be permitted.

## **Heritage and Tall Buildings**

- Extensive alterations to Policy S11 to emphasise the need to celebrate heritage, public enjoyment and make these places inclusive.
- Revised S11 to focus on Heritage-led placemaking, retrofit and collaboration between heritage sites and adjacent developments.
- Strengthened Policy HE1 to reflect NPPF wording in relation to heritage harm.
- Revised Policy HE1 requiring for developments to conserve and enhance immediate setting of Bevis Marks Synagogue.
- Policy HE3 has been strengthened to provide greater protection to the setting of the Tower of London World Heritage Site.
- Significant revisions to Policy S12 to identify tall building locations and heights in line with Policy D9 London Plan 2021.
- Revised Policy S13 to take account of views of the City that have been designated by other Local Planning Authorities.

## **Open Spaces and Green Infrastructure**

- Policy OS3 has been revised and a new policy on biodiversity net gain has been added, providing additional clarity on the operation of the net gain approach in the City, with mechanisms to secure benefits over the longer term.

## **Climate Resilience**

- Policy S15 has been amended to further encourage development in the City to contribute toward climate resilience measures.

## **Key Areas of Change**

### ***Blackfriars***

- The policy has been amended to emphasise the need to create an inclusive, welcoming public realm for all – particularly along the riverfront. An addition has been made to the policy recognising the potential for recreational or other uses of the undercroft to the west of Blackfriars Bridge.

### ***Pool of London***

- The policy has been amended to promote greater and more inclusive access to heritage assets.
- The policy has been amended to emphasise the need to create an inclusive, welcoming public realm for all, and to create additional publicly accessible open space near the river.
- Further emphasis has been given to the need to enhance the cultural and leisure offer in the area.

### ***Aldgate, Tower and Portsoken***

- Encouraged a greater mix of uses, including cultural and creative enterprises in S20.

### ***City Cluster***

- Amended Policy 21 requiring delivery of tall buildings in line with Policy S12 ensuring they contribute positively to the City skyline while preserving heritage assets and their settings.
- Amended Policy 21 to ensure development proposals have regard to the immediate setting of Bevis Marks Synagogue.
- Strengthened the requirement to provide open spaces at the ground floor, free to enter terraces and elevated spaces, along with cultural and leisure facilities.
- Strengthened policy S21 to provide better waling and cycling routes.

### ***Fleet Street and Ludgate***

- The KAOC boundary was revised to include the area up to the entrance of St Paul's Cathedral.

### ***Smithfield and Barbican***

- Promoted a retail and leisure economy that supports Smithfield as a leisure and cultural destination in S24.
- Encouraged start-ups, creative and cultural industries and relevant meanwhile uses in the Smithfield area in S24.
- Resisted residential development adjacent to Smithfield Market to protect residential amenity in S24.
- Recognised the creation of the Barbican and Golden Lane Neighbourhood Area in S23.

### ***Liverpool Street***

- Strengthened Policy S26 to provide active frontages at the ground floor level and enhanced public realm.
- Strengthened Policy S26 to provide and enhanced visitor experience with improved wayfinding and enhanced walking and cycling routes.

## 6. Regulation 20 Proposed Submission Consultation (2024)

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Formal notification of the Regulation 20 consultation of the City Plan was carried for a period of 8 weeks between 18 April to 17 June 2024. The Statement of Community Involvement requires a minimum of 6 weeks of consultation but in order to ensure that people had sufficient time to provide a response, consultation was extended for an additional 2 weeks from 31 May to 17 June.

The City of London Corporation received 293 separate responses to the Regulation 20 consultation (2024), amounting to 2,211 comments.

By comparison, during regulation 18, a total of 911 formal comments were received from 65 organisations and individuals. In addition, 150 anonymised comments were collected at first round regulation 18 consultation events. During the first round of regulation 19, which was conducted in 2021, a total of 1,327 formal representations were received from 171 respondents.

### Consultation methods

The City of London held eight events over the consultation period, including two events held jointly to promote the Sustainability SPD. 640 tickets were sold, over the eight events, which included:

- City Plan 2040 Launch
- City Plan 2040: Economic Growth
- City Plan 2040: Residents focused
- Planning for Sustainability SPD and City Plan 2040 Round Table 1
- Planning for Sustainability SPD and City Plan 2040 Round Table 2
- City Plan 2040: Residents focused
- City Plan 2040: Heritage
- City Plan 2040: Residents focused

Notification of the consultation was made by email to approximately 550 consultees on the Local Plan Consultation Database. This included statutory consultees such as all neighbouring boroughs (Camden, Hackney, Islington, Lambeth, Tower Hamlets, Southwark and Westminster), the Greater London Authority, Transport for London, Natural England and Historic England. The database also includes general consultation bodies including businesses, residents' groups and members of the public who have expressed an interest in being kept informed of local plan updates.

The website hosted information on the consultation on a dedicated page that included the Statement of Representations Procedure, Model Representations Form, Privacy Notices and supporting information.

3,045 people visited the Commonplace page to learn more and respond to the consultation.

Posters and physical copies of the City Plan, Statement of Representations Procedure and Model Representations Form were available in the estate offices, all four lending libraries and the Guildhall North Wing reception desk.

Social media was used to publicise the launch of the consultation period and advertise all the consultation events. Through the use of Facebook, LinkedIn and X, people were invited to join the consultation events and were provided a link to Commonplace to view the City Plan, supporting documents and learn how to provide a representation.

A 'You Said We Did' document was also produced to highlight key messages from the previous consultations and evidence base.

<b>Consultees</b>	<b>Number invited to make representations</b>
Statutory Consultees, as per Table 1, Appendix A of the SCI	27
Access and Disability Groups	1
Age Groups	0
Amenity Groups	1
Arts and Leisure Groups	1
Business Groups	4
Charitable Organisations	2
Educational Institutions and Agencies	2
Environmental Interest Groups	2
Local and Government Agencies	0
Historic Building Groups	11
Infrastructure Providers	1
London Boroughs and Other Councils	12
London Partnerships	7

<b>Consultees</b>	<b>Number invited to make representations</b>
Medical and Health Institutions and Groups	1
Nature and Wildlife Conservation Groups	3
Professional Institutes/Organisations	0
Property Groups	2
Racial, ethnic and national groups	0
Religious and Non-Religious Institutions and Groups	12
Residents' Associations and Neighbourhood Forums	13
Transport Groups	6
Visitor and Tourism Bodies	1
Ward Clubs	1
Livery Companies	39

**Appendix 8** provides evidence of publicity of the Regulation 19 City Plan, including evidence of emails sent, screenshots of the website, Commonplace portal, social media posts, posters, model representation form and statement of Representations Procedure.

### Summary of the main issues

#### Chapter 1 Strategic Priorities

Comments provided some general support for the priorities and balance for sustainable development with some concerns about potential conflicts or inconsistencies between approaches and policies. Made some suggestions that aspirations for growth are not appropriately justified by the evidence, and some seeking additional emphasis on residential communities, wellbeing and liveability.

*Representations from:* R0004 - Laura Jorgensen, R0006 - Tim Brennan, Historic England , R0100 - Miles Celic, TheCityUK, R0119 - Dan Scanlon, Brookfield Properties, R0126 - Alan Bright, St Michael Cornhil, R0135 - Mary Manuel, NHS London Healthy Urban Development Unit in unison with the



North East London Integrated Care Board and local NHS Trust, R0162 - Dr Hywel Davies, St Benet's the Metropolitan Welsh Church, R0164 - Chris Fowler, City Heritage Society , R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0187 - Lee Mallet, City Architecture Forum , R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0206 - Tom Pemberton, Montague Evans, on behalf of Jastar Capital, R0212 - Brenda Szlesinger, Thomas More House Group , R0214 - Kevin Hart, City of London Law Society , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0219 - John Griffiths, City of London Common Councillor on behalf of the Culture, Heritage and Libraries Committee, R0220 - Oliver Caroe, St Paul's Cathedral, R0221 - Anett Rideg, City of London Common Councillor, R0236 - Hugh Cross, R0238 - Anne Louise Page, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0242 - Mark Lemanski, R0244 - Malcolm Torry, St Mary Ab Church , R0257 - Russell W Jenkins, R0258 - Scarlett Parker, R 0273 - Barnaby Collins, DP9 on behalf of TT Group, R0278 - Luke Emmerton, DP9 on behalf of Northwood Investors Ltd, R0288 – Jayne Evans, R0291 - n/a, R0231 - Admin

*City Corporation response:* The City Corporation considers the strategic priorities to strike an appropriate balance between the three pillars of sustainable development. However, if it is felt during the course of the examination further detail is to be required some additional wording can be considered and proposed changes will be submitted.

## Chapter 2 Spatial Strategy

General support for the Spatial Strategy which seeks to retain the City's function as an international and national commercial centre with some minor comments on emphasis or wording. Some consideration that the strategy is ineffective and cannot achieve growth aspirations while conserving and enhancing the historic environment, and some concerns that culture should have additional emphasis.

*Representations from:* R0006 - Tim Brennan, Historic England , R0099 - Maddison Driver, Savills on behalf of Aviva, R0115 - Rachel Weaver, London Borough of Hackney , R0119 - Dan Scanlon, Brookfield Properties, R0143 - Inger Lannero, St Mary Woolnoth, St Edmund the King and Martyr and St Clement Eastcheap with St Martin Orgar, R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf

of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0193 - Jane Smith, Barbican Association, R0214 - Kevin Hart, City of London Law Society , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0219 - John Griffiths, City of London Common Councillor on behalf of the Culture, Heritage and Libraries Committee, R0220 - Oliver Caroe, St Paul's Cathedral, R0221 - Anett Rideg, City of London Common Councillor, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R 0273 - Barnaby Collins, DP9 on behalf of TT Group, R0296 - Lucy Bird, Berkeley Ventures

*City Corporation response:* The City Corporation considers the spatial strategy is effective in striking a balance between competing priorities. However, if it is felt during the course of the examination further detail on the role of culture in this strategy can be considered and proposed changes will be submitted.

### Chapter 3 Health, Inclusion and Safety

*Strategic Policy S1: Healthy and Inclusive City-* Representations seek additional reference to places of worship and faith communities in facilitating wellbeing and other references requested. Concerns regarding light spill and the reduction of adequate daylight/sunlight through cumulative development and policies relating to healthy living with some proposed amendments, enhanced cool and heat spaces to combat weather extremes.

*Policy HL1: Inclusive buildings and spaces-* Considers that EqiA's are not always necessary for major development; need should be based on scale and type of building. Requirement for 'no disabling' barriers is unrealistic; need more flexibility in the policy.

*Policy HL2: Air quality-* Differing opinions in relation to the level of flexibility required for in relation to aims of minimising air pollution. Comments seeking further alignment with the Air Quality Strategy or to ensure in line with guidance or targets.

*Policy HL3: Noise-* Suggestions that the policy combines different stages of noise and proposes specific amendments to add additional emphasis to policies.

*Policy HL4: Contaminated land and water quality-* Suggestions that policy should be expanded to reference best practise in water quality management.

*Policy HL5: Location and protection of social and community facilities-* Suggestions that policy is not sound in relation to community sport facilities as would allow for intensification of facilities, which facilitates a net loss. Policy HL5(b). Also suggests that the plan should be based on a robust assessment

of demand, including use of the Sport England Sports Facility Calculator that can calculate the likely demand of particular development.

*Policy HL6: Public toilets:* Suggested there should be more public toilet provision, with a strengthening of the Community Toilet Scheme as well as standalone toilets.

*Policy HL7: Sport and recreation-* Concerns that the policy is not sound as it does not align with the NPPF, Paragraph 103, and Sport England's Planning Policy. It only protects public sites however the NPPF does not distinguish between public and private sites. It should be based on a robust Sports Facilities Strategy. Policy approach to protection of existing sports facilities and states plan is unsound for these reasons.

*Policy HL8: Play areas and facilities* – Considers that more play areas are required but need to ensure they are well managed to avoid anti-social behaviour and disturbance to nearby residents.

*Policy HL9: Health Impact Assessment (HIA)-* Provided some support for the requirements for a Health Impact Assessment.

*Strategic Policy S2: Safe and Secure City-* Recommends promoting 'safe havens' in buildings with 24-hour security in the event of severe weather or crime.

*Policy SA1: Publicly accessible locations* – Considers that the need for full risk assessment for counter terrorism is too onerous.

*Policy SA2: Dispersal Routes* Made some suggestions about how to incorporate Active Design throughout the City to enable healthy movement of people and sought

*Policy SA3: Designing in Security* loosening of requirement for management statements and anti-terrorism risk assessments.

*Representations from:* R0004 - Laura Jorgensen, R00840084 - Vicky Cartright, R0099- Maddison Driver, Savills on behalf of Aviva, R0106- Ellen Moore, NHS Property Services, R0112 - Harry Scott, Environment Agency , R0114 - Amelia Hunt, Savills on behalf of Marldon , R0116 - Rev Paul Gismondi, All Hallows on the Wall, R0117 - J-J Lorraine, Morrow Lorraine , R0118 - Gavin McLaughlin, Transport for London, R0125 - Luke Miller, R0126 - Alan Bright, St Michael Cornhil, R0127 - Reverend Paul Kennedy, St. Vedast , R0135 - Mary Manuel, NHS London Healthy Urban Development Unit in unison with the North East London Integrated Care Board and local NHS Trust, R0143 - Inger Lannero, St Mary Woolnoth, St Edmund the King and Martyr and St Clement Eastcheap with St Martin Orgar, R0154 - Jane Bickerton, R0157 - KL Marshall, Churchwarden of All Hallows by the Tower , R0162 - Dr Hywel Davies, St Benet's the Metropolitan Welsh Church, R0176 - Charles Begley, City Property Association , R0188 - Daniel Botten, ROK

Planning on behalf of Unite Group, R0190 - Tom Sweetman, DP9 on behalf of The Tower Limited Partnership, R0193 - Jane Smith, Barbican Association, R0199 - Jane Smith, Seddon House Group , R0206 - Tom Pemberton, Montague Evans, on behalf of Jastar Capital, R0208 - Tom Sweetman, DP9 on behalf of GPE PLC, R0210 - Helen Kay, Willoughby House Group , R0212 - Brenda Szlesinger, Thomas More House Group , R0214 - Kevin Hart, City of London Law Society , R0215 - Simon Birkett, Clean Air London , R0217 - Cordula Zeidler, London Heritage Consultancy, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0224 - Johanne Moss, The Wardens and PCC of St James Garlickhythe, R0228 - Admin, R0229 - Liz Messenger, City and Hackney Public Health, , R 00239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0248 - Tom Clarke MRTPI, R0251 - Richard Saxon, R0259 - Terry Gander, R0269 - P Conolly, St Peters upon Cornhill, R0277 0271 - Mark Furnish, Sport England , R0284- James Irvig, St Bride's Church, R0289 - Lucy Bird, Berkeley Ventures, R0292 Greater London Authority

*City Corporation response:* The City Corporation has identified some areas which, during the course of the examination could be further considered to make further reference to churches and faith communities and their role in communities. Proposed changes will be submitted to the examination.

#### Chapter 4 Housing

*Strategic Policy 4: Housing-* Varied views on the approach to housing delivery and targets, with some queries over the completions data, seeking greater clarity on the background. Some suggestions for flexible application of the affordable housing targets, including through cash in lieu and cultural provision requirement should not apply to retrofits etc. Some general support for specialist housing policies (HS6-HS8) but suggests clarification of role of build to rent, student accommodation and co-living in meeting targets, suggesting this should be reflected within the glossary. A series of request for the inclusion of a new policy on shared living.

*Policy HS1: Location of new housing-* Support for maintaining the role of the City as primary business function, with support for identified residential clusters. Variation of views in relation to whether the plan is appropriately flexible in relation to ability to develop mixed use with housing outside clusters. Requests for policy on agent of change principle to be strengthened and for housing sites to be allocated. Queries on evidence for relying on windfall provision.

*Policy HS2: Loss of housing-* calls for some minor amendments relating to the amalgamation of homes and deliverability considerations.

*Policy HS3: Residential environment-* General support for policy approach with calls for additional emphasis.

*Policy HS6: Student accommodation and hostels-* Calls for student housing to be considered in same category as other types of housing. General support for the approach to student accommodation, with some additional queries in relation to the need for a HEI nominations agreement and whether Building Regulations Part M applies.

*Policy HS7: Older persons housing-* Further clarity sought on requirements for older persons accommodation.

*Representations from:* R0237 - Ilinca Diaconescu, London Borough of Islington, R0098 - Craig Slack, Dominus, R0103 - James Stevens, Home Builders Federation, R0114 - Amelia Hunt, Savills on behalf of Marldon , R0122 - Beth Hawkins, Gerald Eve on behalf of Merchant Land. , R0135 - Mary Manuel, NHS London Healthy Urban Development Unit in unison with the North East London Integrated Care Board and local NHS Trust, R0156 - David Rose, R0159 - Laura Jenkinson, Avison Young , R0165 - Rachel Blake, PPC Labour and Co-operative Cities of London and Westminster, R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0176 - Charles Begley, City Property Association , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0188 - Daniel Botten, Rok Planning on behalf of Unite Group, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0191 - Jodane Walters, DP9 on behalf of Hub Residential Limited, R0196 - Charlotte Orrell, DP9 on behalf of TransEuropean VII, R0199 - Jane Smith, Seddon House Group , R0210 - Helen Kay, Willoughby House Group , R0212 - Brenda Szlesinger, Thomas More House Group , R0216 - Calum Chipman, London Borough of Southwark , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0106 - Ellen Moore, NHS Property Services, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R 0271 - Rosanna Sterry, Transport for London, R 0273 - Barnaby Collins, DP9 on behalf of TT Group, R0289 - Lucy Bird, Berkeley Ventures, R0292 Greater London Authority

*City Corporation response:* A Housing Explanatory Note has been prepared to further explain the background to the preparation of housing policies. It provides updates on housing delivery to include the year of 2023/24, and anticipated delivery within the plan period. This note sets out some potential areas where changes or updates to the text may be considered, to be discussed during the course of the examination.

## Chapter 5 Offices

*Strategic Policy S4: Offices-* Considers demand for office development to be at the upper end of the evidence scale between 1.55 and 1.9m sqm, with some other calls for 2m sqm. Conversely comments questioning a need for this volume of office space in the context of changes to working patterns and



vacant space and the potential impacts on the historic environment. Other comments questioning the target in comparison to delivery.

*Policy OF1: Office development-* Support for the retrofit approach with some clarifications requested in relation to alignment with other policies such as DE5. Queries the affordable workspace requirements, considers not to be in line with the London Plan E3 in relation to the supporting evidence.

*Policy OF2: Protection of Existing Office Floorspace* - suggestions for some additional flexibilities in relation to the criteria, including some exceptions to, or removal of the 12-month marketing requirement, positive consideration where meeting the overall strategy of the local plan, the retrofit first approach to meet both proposed criteria, and the provision of new housing at the first stage of assessment. Some suggestions that the retrofit first approach has potential to leave offices unoccupied for periods of time where there is no potential to be converted to other uses. Support for retrofit first approach to OF2 but queries relationships with Office SPD.

*Policy OF3: Temporary 'Meanwhile' Uses* - Considers meanwhile uses should be for up to five years.

*Representations from:* R0006 - Tim Brennan, Historic England , R0065 - Suzy Crawford, DP9 on behalf of Network Rail , R0098 - Craig Slack, Dominus, R0099 - Maddison Driver, Savills on behalf of Aviva, R0114 - Amelia Hunt, Savills on behalf of Marldon , R0116 - Rev Paul Gismondi, All Hallows on the Wall, R0119 - Dan Scanlon, Brookfield Properties, R0122 - Beth Hawkins, Gerald Eve on behalf of Merchant Land. , R0126 - Alan Bright, St Michael Cornhil, R0158 - Jake Tubb, DP9 on behalf of Whitbread, R0159 - Laura Jenkinson, Avison Young , R0160 - Kathryn Hobbs, R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0164 - Chris Fowler, City Heritage Society , R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0167 - Mike Worthington, DP9 on behalf of British Land , R0168 - Jonathan Smith, DP9/The Townscape Consultancy on behalf of HP IBEX Investment SARL, R0169 - Jonathan Smith, DP9 on behalf of SEA Profit Holdings Ltd, R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patrizia, R0176 - Charles Begley, City Property Association , R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0187 - Lee Mallet, City Architecture Forum , R0188 - Daniel Botten, ROK Planning on behalf of Unite Group, R0189 - Guy Newton, The Victorian Society , R0190 - Tom Sweetman, DP9 on behalf of The Tower Limited Partnership, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0191 - Jodane Walters, DP9 on behalf of Hub Residential Limited, R0196 - Charlotte Orrell, DP9 on behalf of TransEuropean VII, R0197 - Anna Harry, Montagu Evans, on behalf of



Freshwater Group of Companies, R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0202 - Coco Whittaker, Twentieth Century Society, R0208 - Tom Sweetman, DP9 on behalf of GPE PLC, R0210 - Helen Kay, Willoughby House Group, R0211 - Edward Kitchen, Gerald Eve on behalf of Aviva and Obayashi, R0216 - Calum Chipman, London Borough of Southwark, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R0248 - Tom Clarke MRTPI, R0253 - Eamonn Mullally, City of London Common Councillor, R0268 - Ross Sayers, Landsec, R0270 - Sinead Morrissey, DP9 on behalf of LiptonRogers Developments LLP, R0271 - Rosanna Sterry, Transport for London, R0273 - Barnaby Collins, DP9 on behalf of TT Group, R0274 - Peter Twemlow, DP9 on behalf of General Partners Ltd, R0277 - Mark Furnish, Sport England, R0278 - Luke Emmerton, DP9 on behalf of Northwood Investors Ltd, R0280 - David Ralf, Theatre Deli, R0285 - Alexander Morris, WELPUT, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0291 - n/a, R0292 Greater London Authority

*City Corporation response:* An Offices Explanatory Note has been prepared to further explain the reasoning and background to the policies. It provides information on office completions, trajectory of future floorspace and other policy areas, to be discussed during the course of the examination.

## Chapter 6 Retail

*Strategic Policy S5: Retail and active frontages* - Support strategic approach to greater mix of retail, leisure, entertainment, culture and other uses but highlight vacant retail units. Consideration that the retail policies do not align with current retail trends

*Policy RE1: Principal Shopping Centres* - Comments in relation to aspirations of retail policies in creating vibrancy which could be through a variety of uses. Considers some inconsistencies between the retail and office policies and a need for flexibility for spaces outside retail clusters

*Policy RE2: Active frontages*- Concern about the 12-month marketing requirement, requesting a degree of flexibility.

*Representations from:* R0099 - Maddison Driver, Savills on behalf of Aviva, R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, 0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R01200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0239 - Mike Fairmaner,

Fleet Street Quarter BID on behalf of City BIDS, R0256 - Philip Jeremy, R0280 - David Ralf, Theatre Deli, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0288 - Kevin Hart, London Law Society

*City Corporation response:* A majority of the concerns relate to appropriate flexibilities and the marketing requirement, which is in line with the London Plan.

## Chapter 7 Culture and Visitors

Strategic Policy S6: Culture and Visitors – The definitions of cultural infrastructure and cultural contributors should be used throughout the chapter. Additional references should be made to the cultural work churches do (community events, education, heritage value etc)

*Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities*

*Policy CV2: Provision of Arts, Culture and Leisure Facilities-* Requests for additional flexibilities in relation to on-site cultural provision requirements with some amendments to the threshold proposed, including whether it should apply to uplift only. Concerns about lack of a co-ordinated approach to cultural provision given there is a 'blanket' requirement for all major development to make some type of contribution. Potential for several fragmented cultural spaces. Clarity was requested on whether financial contributions can be pooled. Detailed management plans and confirmation of cultural occupiers was stated to not be possible at application stage. Concern about the weight given to the Cultural Planning Framework which had not undergone any consultation.

*Policy CV3: Provision of Visitor Facilities* – Some confusion as to the type of development this policy would apply to.

*Policy CV4: Hotels* - Generally supportive comments. Some requested more explicit targets for hotel room growth and additional flexibilities for serviced apartments and apart-hotels.

*Policy CV5: Evening and Night-Time Economy* - Minor comments around how prominently the Agent of Change principle is stated in the policy.

*Policy CV6: Public Art-* Seeking minor amendments to policy wording for additional inclusivity.

*Representations from:* R0004 - Laura Jorgensen, R0008 - Matt Brewser, Urban Space Planning on behalf of Historic Royal Palaces, R0011 - Xhevat Ademi, R0030 - Ilinca Diaconescu, London Borough of Islington, R0064 - Gordon Seabright, Creative Land Trust, R0065 - Suzy Crawford, DP9 on behalf of Network Rail, R0082 - John Adams, JDA Planning Consultancy on behalf of CC Land, R0084 - Vicky Cartright, R098 - Craig Slack, Dominus, R099 - Maddison Driver, Savills on behalf of Aviva, R0110 - Tasmin Ace, East

Bank, R0114 - Amelia Hunt, Savills on behalf of Marldon , R0116 - Rev Paul Gismondi, All Hallows on the Wall, R0118 - Gavin McLaughlin, Transport for London, R0119 - Dan Scanlon, Brookfield Properties, R0122 - Beth Hawkins, Gerald Eve on behalf of Merchant Land. , R0125 - Luke Miller, R0126 - Alan Bright, St Michael Cornhil, R0127 - Reverend Paul Kennedy, St. Vedast , R0157 - KL Marshall, Churchwarden of All Hallows by the Tower , R0158 - Jake Tubb, DP9 on behalf of Whitbread, R0159 - Laura Jenkinson, Avison Young , R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0167 - Mike Worthington, DP9 on behalf of British Land , R0171 - Joss Taylor, Bow Arts Trust , R0176 - Charles Begley, City Property Association , R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0187 - Lee Mallet, City Architecture Forum , R0190 - Tom Sweetman, DP9 on behalf of The Tower Limited Partnership, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0196 - Charlotte Orrell, DP9 on behalf of TransEuropean VII, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0201 - Bengi Unsal, Institute of Contemporary Arts , R0206 - Tom Pemberton, Montague Evans, on behalf of Jastar Capital, R0208 - Tom Sweetman, DP9 on behalf of GPE PLC, R0210 - Helen Kay, Willoughby House Group , R0212 - Brenda Szlesinger, Thomas More House Group , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0219 - John Griffiths, City of London Common Councillor on behalf of the Culture, Heritage and Libraries Committee, R0220 - Oliver Caroe, St Paul's Cathedral, R0221 - Anett Rideg, City of London Common Councillor, R0224 - Johanne Moss, The Wardens and PCC of St James Garlickhythe, R0228 - Admin, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0244 - Malcolm Torry, St Mary Ab Church , R0247 - City Arts Initiative, R0248 - Tom Clarke MRTPI, R0250 - Nigel Gammon, R0253 - Eamonn Mullally, City of London Common Councillor, R0274 - Peter Twemlow, DP9 on behalf of General Partners Ltd , R0277 - Mark Furnish, Sport England , R0280 - David Ralf, Theatre Deli , R0284 - James Irving, St Bride's Church, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0287 - Katrin Hersel, Almacantar, R0231 - Admin

*City Corporation response:* The overall approach to culture, including the requirement for major development to make contributions is considered sound. It is acknowledged that additional detail on how this policy would operate in practice may be required, but the Local Plan is not the appropriate document to contain this. Following the adoption of the plan, the City Corporation will consider additional guidance.

The City Corporation anticipates a discussion at examination about the definition of culture used in the chapter and the status of the Cultural Planning Framework. To aid this discussion the City Corporation has produced an explanatory note that provides further details on City Corporation's response.

The City Corporation will also submit some potential changes to the Local Plan text.

## Chapter 8 Infrastructure

*Strategic Policy S7: Infrastructure and Utilities-* Plan considered unsound due to concerns around a lack of sport facility strategy and policy approach to protection of existing sports facilities.

*Policy IN2: Infrastructure Capacity-* Thames Water supports the aims of the policy on infrastructure capacity IN2 but identifies that new development will need to be aligned with any necessary water or wastewater network upgrades to support growth. Preference for the use of phasing conditions to ensure that development is not occupied until the required infrastructure upgrades delivered.

*Representations from:* R0090 - Chris Colloff, Thames Water , R0103 - James Stevens, Home Builders Federation, R0112 - Harry Scott, Environment Agency , R0176 - Charles Begley, City Property Association , R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0193 - Jane Smith, Barbican Association, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0241 - Steve Watson, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R0214- Kevin Hart, London Law Society

*City Corporation response:* Comments on infrastructure focused on the need to align development with the required infrastructure, including sports facilities and water and wastewater.

## Chapter 9 Design

*Strategic Policy S8: Design –* Recommendations to strengthen policies on street level public realm, the retrofit first approach, urban heat island effect. Recommendations to improve consistency in terminology. Comment that policies lack evidence.

*Policy DE1: Sustainable Design –* Requests to integrate flexibility and recognise that environmental sustainability should be balanced with economic and social dimensions of planning. Recommendation to strengthen the sustainability policy and integrate Urban Heat Island policies. Clarifications requested on standards and certifications such as BREEAM and NABERs, and definitions that trigger sustainability standards such as 'major development' and 'extensions'.

*Policy DE2: Design Quality –* Suggest that plant and MEP should be below ground. Suggest that fully screened plant and MEP is not always possible from tall buildings. Recommendations to strengthen policies on street level public realm and amenity impacts on surrounding sensitive uses. Clarifications requested on 3D visualisations.

*Policy DE3: Public Realm* – Concern about impact of tall buildings on open spaces. Recommendations to strengthen policies on street level public realm, prioritised over terraces and elevated spaces. Suggested clarifications about public art.

*Policy DE4: Terraces and Elevated Public Spaces*- Suggests additional flexibilities in relation to the publicly accessible elevated space requirements.

*Policy DE5: Shopfronts* – Suggestion that further retail space isn't justified and public seating should be a requirement.

*Policy DE6: Advertisements* – Support for policies. Further suggestions for hoarding (including green hoarding, information display for the development) and A-boards.

*Policy DE7: Daylight and sunlight* – Additional daylight, sunlight and overlooking controls recommended for places of worship and residences (including external spaces and balconies). Suggest the requirement for a visual amenity assessment. Request to clarify 'cumulative impact'.

*Policy DE8: Lighting* – Suggested requirements for internal black-out blinds and controls over internal illuminated screen displays.

*Representations from:* R0002 - Fred Rodgers, R0006 - Tim Brennan, Historic England , R0237 - Ilinca Diaconescu, London Borough of Islington, R0065 - Suzy Crawford, R0065 - Suzy Crawford, DP9 on behalf of Network Rail , R0082 - John Adams, JDA Planning Consultancy on behalf of CC Land, R0084 - Vicky Cartright, R0099 - Maddison Driver, Savills on behalf of Aviva, R0106 - Ellen Moore, NHS Property Services, R0111 - Tom Davies, London Borough of Lambeth , R0112 - Harry Scott, Environment Agency , R0114 - Amelia Hunt, Savills on behalf of Marldon , R0118 - Gavin McLaughlin, Transport for London, R0119 - Dan Scanlon, Brookfield Properties, R0122 - Beth Hawkins, Gerald Eve on behalf of Merchant Land. , R0130 - Michael Atkins, Port of London Authority , R0157 - KL Marshall, Churchwarden of All Hallows by the Tower , R0158 - Jake Tubb, DP9 on behalf of Whitbread, R0159 - Laura Jenkinson, Avison Young , R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0167 - Mike Worthington, DP9 on behalf of British Land , R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0190 - Tom Sweetman, DP9 on behalf of The Tower Limited Partnership, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0199 - Jane Smith, Seddon House Group , R0200 - Anna Harrhy, Montagu



Evans, on behalf of Railpen, R0208 - Tom Sweetman, DP9 on behalf of GPE PLC, R0209 – Surrey County Council, R0210 - Helen Kay, Willoughby House Group , R0211 - Edward Kitchen, Gerald Eve on behalf of Aviva and Obayashi, R0212 - Brenda Szlesinger, Thomas More House Group , R0216 - Calum Chipman, London Borough of Southwark , R0222 - Cordula Zeidler, London Heritage Consultancy, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0237 - Yarema Ronish, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0249 - n/a, R0274 - Peter Twemlow, DP9 on behalf of General Partners Ltd , R0276 - Rabbi Dr Michael Hilton, R0278 - Luke Emmerton, DP9 on behalf of Northwood Investors Ltd, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0289 - Lucy Bird, Berkeley Ventures

*City Corporation response:* General support of strategic policies that support sustainable design and exemplar standard of design. The policy is considered sound, however some amendments could be made to clarify definitions such as 'major development' and 'extensions', and clarify the emerging NABERS rating scheme. These will be proposed during the course of the examination. Other comments are generally addressed within other policies in the City Plan.

## Chapter 10 Transport

*Strategic Policy S9: Transport and Servicing* – Recommendation for cycle promotion plan to be removed in place of Travel Plans. The PLA supports the policy, especially in regards to public transport capacity and step free access.

*Policy VT1: The impacts of development on transport* – Desire for the policy to provide flexibility to delivery and servicing arrangements to be considered in unique circumstances, such as the mixed use Barbican Estate.

*Policy VT2: Freight and Servicing* – The objective of VT2 is understood but there is a lack of clarity on how it will work in practice. Comments around adding specific freight and servicing tools such as joint functioning spaces. The PLA supports seeking opportunities to increase freight by rail and river.

*Policy VT3: Vehicle Parking* - Support for underutilised car parks to be used for alternative uses. TfL requests that all off-street non-residential car parking bays should be equipped with electric vehicle charging points.

*Policy VT4: River Transport* – Support noted.

*Policy VT5: Aviation Landing Facilities* – Supporting text related to drones may need to be amended as the policy only refers to heliports.

*Strategic Policy S10: Active Travel and Healthy Streets* – Support for the implementation of walking routes and improved conditions. TfL welcomes the revisions to the policy, as per previous comments.



*Policy AT1: Pedestrian Movement, Permeability and Wayfinding* – TfL would like pedestrian comfort levels to be included in the policy and reference to section 278 works. Suggestions for policy amendment where a public realm may require a loss of public highway. Suggestion for a policy amendment to enable improved and new connections through to mainline railway stations from Network Rail. Major developments should model pedestrian flows onsite.

*Policy AT2: Active Travel including Cycling* – There should be reference to TfL cycle hire.

*Policy AT3: Cycle Parking*- Suggestions that the cycle parking standards are no longer appropriate in relation to hybrid working patterns and employment densities. Cycle parking should be easily accessible and not placed as an obstruction to someone with disabilities.

*Representations from:* R0011 - Xhevat Ademi, R0237 - Ilinca Diaconescu, London Borough of Islington, R0084 - Vicky Cartright, R0099 - Maddison Driver, Savills on behalf of Aviva, R0114 - Amelia Hunt, Savills on behalf of Marldon , R0118 - Gavin McLaughlin, Transport for London, R0119 - Dan Scanlon, Brookfield Properties, R0121 - Craig Hatton, Network Rail, R0130 - Michael Atkins, Port of London Authority , R0157 - KL Marshall, Churchwarden of All Hallows by the Tower , R0159 - Laura Jenkinson, Avison Young , R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0166- Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0167 - Mike Worthington, DP9 on behalf of British Land , R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0188 - Daniel Botten, ROK Planning on behalf of Unite Group, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0210 - Helen Kay, Willoughby House Group , R0212 - Brenda Szlesinger, Thomas More House Group , R0216 - Calum Chipman, London Borough of Southwark , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0234 - Tony Michael, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0240 - Tim, R0242 - Mark Lemanski, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R0246 - Sam Smith, R0253 - Eamonn Mullally, City of London Common Councillor, R0254 - Whats Up, R0255 - Peter Scales, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0291 - n/a, R0292 Greater London Authority

*City Corporation response:* Support for the objectives of the transport policies overall. However, while there are some queries on how policies will work in practice, suggested amendments on specific policy areas are considered too

detailed in relation to specific sites/areas, which can be better addressed through specific applications or the City Corporation's Healthy Streets Plans.

## Chapter 11 Heritage and Tall Buildings

*Strategic Policy S11: Historic Environment-* Specific and significant concerns about approach to heritage in relation to specific assets such as St Paul's Cathedral, Tower of London World Heritage Site and churches. Concerns about a lack of a list of Non-Designated Heritage Assets and perceived inconsistencies between heritage policies and other policies of the plan, in particular tall buildings and growth. Additional comments in relation to the Heritage Impact Assessments (HIA) and Strategic View Impact Assessments (SVIA)

*Policy HE1: Managing Change to the Historic Environment-* Submission of detailed technical information and comments relating specifically to the Tower of London, St Pauls or other heritage assets. Comments relating to the 'immediate setting' of the Bevis Marks synagogue and whether this provides enough protection, or should be extended to cover additional site at 31 Bury Street. States this approach is contrary to NPPF or requires strengthening in line with Planning (Listed Buildings and Conservation Areas) Act 1990. Draws some comparisons to the approach to Bevis Marks and its protection in relation to the Monument. Call for the continuation of the presumption against tall buildings in Conservation Areas as included in the adopted plan

*Policy HE2: Ancient Monuments and Archaeology-* general support for the approach of the policy with some suggested but limited amendments

*Policy HE3: Setting of the Tower of London World Heritage Site-* comments suggesting this policy is unsound due to the impacts of the tall buildings cluster on the Tower of London World Heritage Site.

*Strategic Policy S12: Tall Buildings-* Suggestions that the approach to tall buildings and contour lines has potential to be unduly restrictive and not result in optimisation of sites, so requires some flexibility in the application of the policy Site specific queries relating to the tall buildings contours, calling for some amendments to heights and boundaries. Other comments relating to the tall buildings contours and how these are to be interpreted and applied. Proposes some amendments to policies in relation to how proposals for, or site with existing tall buildings outside the clusters are considered

*Strategic Policy S13: Protected Views-* site specific implications and further consideration of Bevis Marks and the Monument views

*Representations from:* R0002 - Fred Rodgers, R0004 - Laura Jorgensen, R0005 - Gillian Merron, R0006 - Tim Brennan, Historic England , R0007 - Juliane Neurberger, R0008 - Matt Brewer, Urban Space Planning on behalf of Historic Royal Palaces , R0009 - Lord Wolfson of Tredegar, R0011 - Xhevat

Ademi, R0012 - Michael Alpert, R0013 - John Solomons, R0014 - Robert Yentob, R0015 - Freddy Salem, R0016 - Michael Ison, R0017 - Jenny Seres, R0018 - Ian Stoleran, R0019 - David Dwek, R0020 - Sue Garcia, R0021 - Celine Boussidan, R0022 - Edward Boujo, R0023 - Daniel Ofer, R0024 - Michael Green, R0025 - David Wolfson, R0026 - Amanda Mount, R0027 - Muriel Salem, R0028 - Marcus Gomes da Costa, R0029 - Jeremy Schonfield, R0030 - Ilinca Diaconescu, London Borough of Islington, R0032 - Jonathan Somekh, R0033 - Joel Bonnet, R0034 - Gila Ansell, R0035 - Donna Seruya, R0036 - Stephen Mulvany, R0037 - David Zubaida, R0038 - Lorraine Silver, R0039 - Y Bendahan, R0040 - Glora Spielman, R0041 - Ruth Saleh, R0042 - Daniel Sasto, R0043 - Laurent Sicsic, R0044 - Howard Martin, R0045 - David Shamash, R0046 - Sylvia Gottschalk, R0047 - Simon Tabbush, R0048 - Natanel Cohen-Arazi, R0049 - Andrew Levy, R0050 - Gerald Morgan, R0051 - Cindy Dawood, R0052 - Daniel D Sacerdoti, R0053 - George-Michael Mourtzilias, R0054 - Yvonne Saltoun, R0055 - Katharine Ridler, R0056 - Terence Etherton, R0057 - Norman Dawood, R0058 - Sarah Lucy Cooper, R0059 - Charlotte Green, R0060 - Debby Grant, R0061 - John Schofield, City of London Archeological Trust, R0062 - Jack Bekhor, R0065 - Suzy Crawford, DP9 on behalf of Network Rail, R0067 - Richard Sassoon, R0068 - Barbara Simon, R0070 - Dr. Michael Poll, R0071 - Sir Stephen Waley-Cohen Bt, R0072 - Beverley Lawrence, R0073 - Alfred Magnus, R0074 - Carmen Gleen, R0075 - Edwin Segall, R0076 - Ruth Timan, R0077 - Ezra Timan, R0078 - Jennifer Brooke, R0079 - Roger East, R0079 - Roger East, R0070 - Paul Arwas, R0081 - Robin Makin, R0082 - John Adams, JDA Planning Consultancy on behalf of CC Land, R0083 - Marilyn Segall, R0084 - Vicky Cartright, R0085 - Solomon Green, R0086 - Marc Cohen, R0087 - Juliet Levy, R0088 - Michael Yudkin, R0089 - Anne Walker, R0091 - George Anticoni, R0092 - Tal Querfurth-Waterman, R0093 - Maya Querfurth-Waterman, R0094 - Dov Waterman, R0095 - Keren Querfurth, R0096 - Tilla Crowne, Bevis Marks Synagogue Trustee, R0097 - Mike Dias, R0099 - Maddison Driver, Savills on behalf of Aviva, R0101 - Frank Martin, R0102 - Tim Smith, London City Airport, R0104 - London and Middlesex Archaeological Trust, R0105 - Dorothy Lampert, R0107 - Baroness Deech DBE KC, R0109 - Sharon Kaplansky, R0111 - Tom Davies, London Borough of Lambeth, R0116 - Margaret Hogan, R0119 - Dan Scanlon, Brookfield Properties, R0120 - The Townscape Consultancy via Brookfield Properties, R0123 - Phil Rosenberg, Board of Deputies of British Jews, R0124 - Jasvir Singh CBE, City Sikhs, R0125 - Luke Miller, R0126 - Alan Bright, St Michael Cornhil, R0128 - Paul Frankenberg, R0129 - Ruth Spencer, R0131 - Terence Warren, R0132 - Luisa Pinnell, R0133 - Matthew Loukes, R0134 - Janet Spencer, R0136 - Ben Crowne, R0137 - Pauline Raywood, R0138 - Deborah Mann, R0139 - Paul Rabin, R0140 - Isabelle Iny, R0141 - Richard Austen, R0142 - Abigail Green, R0144 - William Titterington, R0145 - David Mason, R0147 - Ann Paul, R0148 - Denis Loretto, R0149 - Charlotte Axelson, R0150 - Jackie Matt, R0143 - Inger M. Lannero, R0151 - Andera Rosen, R0152 - Barry Musikant, R0153 - Kris Musikant, R0155 - Teresa Howe, R0157 - KL Marshall, Churchwarden of All Hallows by the Tower, R0158 - Jake Tubb, DP9 on behalf of Whitbread,

R0159 - Laura Jenkinson, Avison Young , R0160 - Kathryn Hobbs, R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0162 - Dr Hywel Davies, St Benet's the Metropolitan Welsh Church, R0163 - Beverley Collins, R0164 - Chris Fowler, City Heritage Society , R0165 - Rachel Blake, PPC Labour and Co-operative Cities of London and Westminster, R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0167 - Mike Worthington, DP9 on behalf of British Land , R0169 - Jonathan Smith, DP9 on behalf of SEA Profit Holdings Ltd, R0174 - Isabelle Ferner, R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0177 - Freddie Chazan, R0178 - Steven Guest, R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0181 - Ariel Chazan, R0182 - Priscilla van der Velde, R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0184 - Joy Hall, R0186 - Roger Hoefling, Honourable Company of Master Mariners , R0189 - Guy Newton, The Victorian Society , R0191 - Marina Rahamim, R0192 - Freddy Salem, R0193 - Jane Smith, Barbican Association, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0198 - Daniel Vincent, R0199 - Jane Smith, Seddon House Group , R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0202 - Coco Whittaker, Twentieth Century Society, R0203 - Lawrence Salem, R0208 - Marcos Chazan, R0205 - Melody Salem, Bevis Marks Synagogue Heritage Foundation, R0206 - Tom Pemberton, Montague Evans, on behalf of Jastar Capital, R0207 - Rabbi Joseph Dweck, R0210 - Helen Kay, Willoughby House Group , R0211 - Edward Kitchen, Gerald Eve on behalf of Aviva and Obayashi, R0212 - Brenda Szlesinger, Thomas More House Group , R0216 - Calum Chipman, London Borough of Southwark , R0222 - Cordula Zeidler, London Heritage Consultancy, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0219 - John Griffiths, City of London Common Councillor on behalf of the Culture, Heritage and Libraries Committee, R0220 - Oliver Caroe, St Paul's Cathedral, R0221 - Anett Rideg, City of London Common Councillor, R0223 - Mark Salem, R0225 - Edward Hagger, R0227 - Maxime E Weiss, R0228 - Admin, R0239 - Sian Rixon, R0240 - Frank Kelsall, R0234 - Tony Michael, R0236 - Hugh Cross, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R0249 - n/a, R0252 - Robert Sutton-Mattocks, R0260 - Michael Bear, R0262 - Tamar schonfield, R0263 - Adele Goldstein, R0264 - Rabbi Morris, R0265 - Lucy Briand, R0266 - Steve Rainbow, R0267 - Simon Ogborn, R0268 - Ross Sayers, Landsec, R0269 - P Conolly, St Peters upon Cornhill, R 0270 - Sinead Morrissey, DP9 on behalf of LiptonRogers Developments LLP, R 0271 - Rosanna Sterry, Transport for London, R0272 - Jane St John Austen, R 0273 - Barnaby Collins, DP9 on behalf of TT Group, R 0274 - Peter Twemlow, DP9 on behalf of General Partners Ltd , R0276 - Rabbi Dr Michael Hilton, R0278 - Luke Emmerton, DP9 on behalf of

Northwood Investors Ltd, R0286 - David Silvera, R0288 - Hannah Rodger, The Guinness Partnership, R0282 - Simon Sackman, R0283 - Edward Waller, the Georgian Group, R0284 - James Irving, St Bride's Church, R0286 - Liam Lawson Jones, DP9 on behalf of Stanhope PLC, R0298 - P Conolly, St Helen's Bishopsgate and St Andrew's Undershaft, R0292 Greater London Authority

*City Corporation response:* The City Corporation has produced a Heritage and Tall Buildings Explanatory Note which responds to the detail set out in representations to this chapter. It is also in the process of preparing a Statement of Common Ground with Historic England and is open to similar discussions with other stakeholders.

## Chapter 12 Open Spaces and Green Infrastructure

Strategic Policy S14: Open Spaces and Green Infrastructure- General support but representations also focussed on specific parts of the policy seeking clarifications or amendments, including distinctions from 'open' to 'green' space, and the role of churchyards in the provision.

*Policy OS1: Protection and provision of open spaces-* Suggestions that the policy requires strengthening and make clear relates to no loss. Request for a 'Open Space Needs Assessment' to reflect London Plan Policy G4 (Open Space) and address AoD. Should be more ambitious in relation increasing amount of open spaces (especially at ground level) and uplift in urban greening.

*Policy OS2: Urban Greening-* Seeks additional flexibility in relation to the Urban Greening Factor (UGF) to take account of site-specific circumstances. Some suggestions that the UGF should also apply minor developments whereas other suggested that it should only apply where an uplift in floorspace of over 1,000sqm. Seeks additional UGF guidance. Additional references are sought in relation to high quality environments and protection of residential amenity, in the context of green spaces, servicing, public realm.

*Policy OS3: Biodiversity-* Suggestions for some amendments to the language provided and whether reference to specific measures are sufficiently detailed, eg swift bricks.

*Policy OS4: Biodiversity Net Gain -* Queries how the 3 units per hectare has been settled upon. Suggestions that the approach to BNG not consistent with national policy, deviating from 10% statutory requirement. Some suggestions that off-site provision should be given more prominence in relation to the urbanised nature of the city, or to maximise the outcomes for biodiversity through diverting funds to existing open spaces in the City. However some acknowledgment of the merit of approach which should inform future national review of policy.



*Policy OS5: Trees-* suggestions of need for additional protection or lack of clarity of policy. Suggestions for provision of mature trees through development.

*Representations from:* R0002 - Fred Rodgers, R0010 - John Sadler, The Countryside Charity (CPRE) , R0082 - John Adams, JDA Planning Consultancy on behalf of CC Land, R0084 - Vicky Cartright, R0099 - Maddison Driver, Savills on behalf of Aviva, R0103 - James Stevens, Home Builders Federation, R0112 - Harry Scott, Environment Agency , R0114 - Amelia Hunt, Savills on behalf of Marlton , R0116 - Rev Paul Gismondi, All Hallows on the Wall, R0119 - Dan Scanlon, Brookfield Properties, R0125 - Luke Miller, R0127 - Reverend Paul Kennedy, St. Vedast , R0157 - KL Marshall, Churchwarden of All Hallows by the Tower , R0166 - Chris Beard, DP9 on behalf of The Prudential Assurance Company Limited, R0172 - Peter Bovill, Montagu Evans on behalf of Meron Ltd, R0173 - Peter Bovill, Montagu Evans on behalf of Royal UK Properties LLC, R0174 - Peter Bovill on behalf of James Andrew, R0175 - Peter Bovill, Montagu Evans on behalf of Patriza, R0176 - Charles Begley, City Property Association , R0190 - Tom Sweetman, DP9 on behalf of The Tower Limited Partnership, R0193 - Jane Smith, Barbican Association, R0194 - Fabian Culican, DP9 on behalf of StayCity UK, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0199 - Jane Smith, Seddon House Group , R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0208 - Tom Sweetman, DP9 on behalf of GPE PLC, R0210 - Helen Kay, Willoughby House Group , R0212 - Brenda Szlesinger, Thomas More House Group , R0209 - Surrey County Council, R0222 - Cordula Zeidler, London Heritage Consultancy, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0226 - Mike Prialux, R0237 - Yarema Ronish, R0239 - Mike Fairmaner, Fleet Street Quarter BID on behalf of City BIDS, R 0271 - Rosanna Sterry, Transport for London, R 0274 - Peter Twemlow, DP9 on behalf of General Partners Ltd , R0288 - Kevin Hart, London Law Society

*City Corporation response:* The City Corporation would like to draw attention to the PPG in relation to Biodiversity Net Gain which allows LPAs to go above the statutory requirement where appropriately evidenced.

### Chapter 13 Climate Resilience

*Strategic Policy S15: Climate Resilience and Flood Risk* – Comments seek strong policies on overheating, urban heat island effect, and flood risk management.

*Policy CR1: Overheating and Urban Heat Island Effect* – Support for the policy to reduce overheating. Some comments suggest further flexibility to the application of the policy, other comments suggest the policy isn't radical enough to address overheating in residential areas.



*Policy CR2: Flood Risk* - To mitigate the risk of flooding in basement development, Thames Water has suggested revised wording in CR2 to identify the need for positive pumped devices to prevent sewer surcharge within the building.

*Policy CR3: Sustainable drainage systems (SuDS)* – Amendments recommended in relation to discharge and run-off rates and a suggestion to add further policy references. Suggestions to embed flexibility. Suggestions to embed biodiversity into SuDS measures.

*Policy CR4: Flood protection and flood defences* – Suggestion from Thames water to update policy references and amended wording in relation to flood defences.

*Strategic Policy S16: Circular Economy and Waste*- support for current approaches, but queries on exploration of sites closer to the city.

*Policy CE1: Sustainable Waste Facilities and Transport* -support for policy, particularly on the use of the river for the removal of waste.

*Policy CE2: New waste management sites* – support for the minimisation of waste.

*Representations from:* R0010 - John Sadler, The Countryside Charity (CPRE) , R0090 - Chris Colloff, Thames Water , R0112 - Harry Scott, Environment Agency, R0121 - Craig Hatton, Network Rail, R0130 - Michael Atkins, Port of London Authority , R0176 - Charles Begley, City Property Association , R0193 - Jane Smith, Barbican Association, R0197 - Anna Harrhy, Montagu Evans, on behalf of Freshwater Group of Companies, R0199 - Jane Smith, Seddon House Group, R0200 - Anna Harrhy, Montagu Evans, on behalf of Railpen, R0212 - Brenda Szlesinger, Thomas More House Group , R0216 - Calum Chipman, London Borough of Southwark , R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0239 - Mike Fairman, Fleet Street Quarter BID on behalf of City BIDS, R0243 - Alderman Prem Goyal, London Chamber of Commerce, R0249 - n/a, R0250 - Nigel Gammon, R0292 Greater London Authority

*City Corporation response:* The City Corporation considers its approach to be underpinned by appropriate evidence and to strike the right balance in terms of policy flexibility

#### Chapter 14 The Temple, Thames Policy area and Key Areas of Change

*Policy TP1: The Temple:* Support for policy but seek wording changes to recognise changes to buildings in the Temples may be necessary for improved modern working practices, accessibility and energy efficiency.

*Strategic Policy S17: Thames Policy Area*- Support for this policy approach.

*Strategic Policy S18: Blackfriars*-Support for Blackfriars KAO and identifies potential for housing delivery in this location alongside some queries relating to archaeology.

*Strategic Policy S19: Pool of London*- Support for the Pool of London KAO and other policies which can be achieved through delivery of this site

*Strategic Policy S20: Aldgate, Tower and Portsoken*-Support elements of the plan and the identified KAO at Aldgate, Tower and Portsoken and at Blackfriars Request additional wording to allow for the comprehensive redevelopment of Aldgate Bus Station and its landholdings at Puddle Dock. Support for the Aldgate, Tower and Portsoken KAO and its promotion for new hotels

*Strategic Policy S21: City Cluster* – Concern for open space provision and impact of tall buildings. Landowners supportive of their sites included in the City Cluster KAO.

*Strategic Policy S22: Fleet Street and Ludgate* – Supportive of the uses and flexibility of the Fleet Street KAO. Include reference to nearby landmarks.

*Strategic Policy S23: Smithfield and Barbican* – Consider that these areas should be separated out into two.

*Strategic Policy S24: Smithfield* – Considers the impacts of the night-time economy in Smithfield should not harm the amenity of St. Bart's Hospital and properties close to Smithfield, in Islington.

*Strategic Policy S25: Liverpool Street* – Supportive of the general principles of the KAO. Desire for enhanced pedestrian permeability.

*Representations from:* R0006 - Tim Brennan, Historic England , R0011 - Xhevat Ademi, R0030 - Ilinca Diaconescu, London Borough of Islington, R0065 - Suzy Crawford, DP9 on behalf of Network Rail , R0069 - Richard Snowden & Richard Honey KC, The Honourable Society of The Inner Temple , R0082 - John Adams, JDA Planning Consultancy on behalf of CC Land, R0084 - Vicky Cartright, R0092 - Tal Querfurth-Waterman, R0094 - Dov Waterman, R0095 - Keren Querfurth, R0098 - Craig Slack, Dominus, R0115 - Rachel Weaver, London Borough of Hackney , R0118 - Gavin McLaughlin, Transport for London, R0121 - Craig Hatton, Network Rail, R0130 - Michael Atkins, Port of London Authority , R0135 - Mary Manuel, NHS London Healthy Urban Development Unit in unison with the North East London Integrated Care Board and local NHS Trust, R0161 - Eleanor Hulm, DP9 on behalf of AXA Real Estate Investment Managers UK Ltd , R0164 - Chris Fowler, City Heritage Society, R0167 - Mike Worthington, DP9 on behalf of British Land , R0168 - Jonathan Smith, DP9/The Townscape Consultancy on behalf of HP IBEX Investment SARL, R0169 - Jonathan Smith, DP9 on behalf of SEA Profit Holdings Ltd, R0176 - Charles Begley, City Property Association ,

R0179 - Sinead Morrissey, DP9 on behalf of One Silk Street , R0193 - Jane Smith, Barbican Association, R0199 - Jane Smith, Seddon House Group , R0206 - Tom Pemberton, Montague Evans, on behalf of Jastar Capital, R0210 - Helen Kay, Willoughby House Group , R0216 - Calum Chipman, London Borough of Southwark , R0222 - Cordula Zeidler, London Heritage Consultancy, R0218 - Brenda Szlesinger and Peter Jenkinson, Barbican and Golden Lane Neighbourhood Forum, R0220 - Oliver Caroe, St Paul's Cathedral, R0222 - Ian Garwood, Honourable Society of the Middle Temple, R0237 - Yarema Ronish, R0239 - Mike Fairman, Fleet Street Quarter BID on behalf of City BIDS, R0245 - Robert Adamson, R0261 - Jane Kistler, R0269 - P Conolly, St Peters upon Cornhill, R 0270 - Sinead Morrissey, DP9 on behalf of LiptonRogers Developments LLP, R 0271 - Rosanna Sterry, Transport for London, R 0273 - Barnaby Collins, DP9 on behalf of TT Group, R0280 - David Ralf, Theatre Deli , R0285 - Alexander Morris, WELPUT, R0287 - Katrin Hersel, Almacantar, R302 - Tower Wardmote

*City Corporation response:* The City Corporation considers these policies to be appropriate.

## Chapter 15 Implementation

*Strategic Policy S26: Planning Contributions* – Support for the majority of contributions in the policy. There's some query on the contributions for cultural provision that it is too vague and has not been consulted upon. The NHS Property Services considers the policy to be unsound and requests for health infrastructure to be identified in Part 2.

*Policy PC1: Viability Assessments* – The NHS North East London ICB welcomes continued engagement with the City on health infrastructure. The GLA requested an amendment to the policy to prioritise the delivery of affordable housing and public transport to be in alignment with the London Plan 2021.

*Representations from:* R0103 - James Stevens, Home Builders Federation, R0118 - Gavin McLaughlin, Transport for London, R0121 - Craig Hatton, Network Rail, R0135 - Mary Manuel, NHS London Healthy Urban Development Unit in unison with the North East London Integrated Care Board and local NHS Trust, R0176 - Charles Begley, City Property Association , R0183 - Suzanne Ornsby, City of London Common Councillor on behalf of Common Councillors of Faringdon Without, R0219 - John Griffiths, City of London Common Councillor on behalf of the Culture, Heritage and Libraries Committee, R0220 - Oliver Caroe, St Paul's Cathedral, R0221 - Anett Rideg, City of London Common Councillor, R0230 - Ellen Moore, NHS Property Services, R0292 Greater London Authority

*City Corporation response:* General support for the planning contributions policies is noted. Following the adoption of the plan, the City Corporation will

consult on a new Planning Obligations SPD and Culture SPD to address the queries on cultural contributions.

### Sustainability Appraisal

Concern that the SA does not address the detailed 3D modelling, or identify perceived negative impacts on heritage of office development.

*Representations from:* R0006 Historic England, R0226 St Paul's Cathedral

*City Corporation response:* The SA has assessed the cumulative impacts of policies including heritage and tall buildings and economic development policy topics.

### Other general comments

- Additional recognition for churches is needed across the plan
- Some references to Bevis Marks Synagogue and a need for further protection
- The Barbican + Golden Lane Neighbourhood Forum should be explicitly recognised on the Smithfield and Barbican KAOC map
- General comments in introduction to sites and representations

*City Corporation response:* Detailed analysis on the potential impacts on Bevis Marks Synagogue and other relevant heritage assets underpins the plan. Further discussion is set out in the Heritage and Tall Buildings Explanatory Note. The Neighbourhood Forum is referenced in the supporting text at 14.8.2; The City Corporation would welcome the development of a Statement of Common Ground with the Neighbourhood Forum.

## **Conclusion**

Summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18 are provided within this document. These include an explanation of how these were taken into account in the preparation of the City Plan 2040, with a summary provided in Section 2. The City Corporation has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

Section 6 explains which bodies and persons were invited to make representations under Regulation 19/20 and how, in accordance with the plan-making Regulations and the SCI 2024. Appendix 9 sets out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations is within the table and the above summary. The City Corporation has therefore met the requirements of

Regulation 22(1)(c) (v). Appendix 9 includes all the responses received, therefore has met the requirements of Regulation 22(1)(d).

**Appendix 9** provides summaries of all responses made under Regulation 20 by respondent (Part A), copies of all representations received (Part B), and response figures from the consultation portal (Part C).

## 7. Further Contacts

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If you would like to receive further updates on the City Plan 2040 and be added to our consultation database email the Local Plan Team.

Email: [localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk)

Queries regarding this report can be made to:

General planning enquiries: 020 7332 1710

The City of London Corporation is the Local Authority for the financial and commercial heart of Britain, the City of London.

Environment Department  
PO Box 270  
Guildhall  
London EC2P 2EJ

## 8. Appendices

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### Appendix 1 – list of respondents to the draft City Plan 2036 Issues and Options consultation

1. Respondent	2. Barbican Association
3. Respondent	4. Berkeley Homes
5. Respondent	6. British Sign & Graphics Association
7. Respondent	8. Chancery Lane Association
9. Chapter of the Cathedral of St Paul in London	10. City of London Archaeological Trust
11. City Property Association	12. City Public Realm, CoL
13. Respondent	14. Conservation Area Advisory Committee
15. Respondent	16. Respondent
17. Environment Agency	18. Respondent
19. Respondent	20. Respondent
21. Greater London Authority	22. Respondent
23. Respondent	24. Historic England
25. Historic Royal Palaces	26. Respondent
27. Respondent	28. Respondent
29. Respondent	30. London Borough of Bexley
31. London Borough of Hackney	32. London Borough of Islington
33. London Borough of Tower-Hamlets	34. Linden & Co (Antiques) Ltd
35. London Cycling Campaign	36. Respondent
37. Merchant Land Investment Ltd	38. Respondent
39. Respondent	40. Museum of London
41. Northern & Shell	42. North London Waste Plan
43. Respondent	44. Port of London Authority
45. Railwatch	46. Respondent
47. Rentplus	48. Respondent
49. Respondent	50. Respondent
51. Royal Borough of Kensington and Chelsea	52. Slough Borough Council
53. Respondent	54. Team London Bridge
55. Theatres Trust	56. Thurrock Borough Council
57. Transport for London	58. Transport for London Taxi and Private Hire
59. Transport for London Property	60. Respondent
61. Respondent	62. Respondent
63. Respondent	64. Respondent

### Appendix 2 – Issues and Options Consultation Responses Summary

#### General Comments on the Whole Plan

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Number of comments: 13

- Three respondents referred to the potential impacts of Brexit and the uncertainty that this has generated for future planning.
- The GLA recognised the unique role of the City of London and highlighted the critical relationships between central London activities and adjoining boroughs.
- Joint working was suggested on a number of issues, including any potential expansion of the Central Activities Zone (CAZ) and the introduction of an Article 4 Direction to extend the CAZ exemption from residential permitted development rights beyond May 2019.
- Two respondents suggested that the Local Plan should include a Special Policy Area to protect the Silver Vaults in Chancery Lane.
- Historic England highlighted the importance of developing a robust evidence base which demonstrates clearly an understanding of the City's historic environment, the significance of its heritage assets and their contribution to the wider environment.
- The Chapter of St Paul's Cathedral expressed an interest in policy development in the area of spirituality, wellbeing, social cohesion, diversity and equality.

## Strategic Objectives

### Question 2.1

What do you consider to be the key challenges that need to be addressed in the Local Plan review?

Number of comments: 21

- There were a wide range of views on the key challenges for the Local Plan review, with no particularly dominant theme emerging.
- Six respondents mentioned Brexit, suggesting that the Local Plan needs to provide a flexible and supportive policy approach towards future commercial office demands in order to maintain the City's competitiveness.
- Six respondents highlighted traffic congestion and related impacts, including road safety concerns, impacts on more vulnerable road users, and traffic pinch-points.
- Five respondents highlighted tackling pollution, particularly poor air quality.
- Four respondents stated that the City needs to play its part in addressing London's housing shortage, including local affordable housing need and accommodation for young City professionals.
- Three respondents referred to overcrowding, pedestrian capacity and the need to widen pavements.
- Three respondents highlighted the importance of the delivery of high-quality public realm and making effective use of the City's limited open spaces/green infrastructure.
- A range of other challenges were identified including tall buildings and further development of the Eastern Cluster; protecting the setting of

internationally significant heritage assets; the delivery of IT infrastructure; protection of amenity in residential wards; changing work patterns; better wayfinding and promotion of the City to visitors; capitalising on the development opportunities presented by Crossrail; minimising flood risk; and providing better linkages with surrounding areas.

### **Question 2.2**

How could the Local Plan help to facilitate the City of London's role as the leading future world class City? Can it provide a flexible framework to respond to significant change whilst providing the certainty sought by much of the development industry?

Number of comments: 11

- This question prompted a mix of views with no dominant themes emerging.
- Two respondents highlighted that the quality of the City's built environment is critical to its future competitiveness, and that the City should lead in providing an environment which delivers for all users. Specific suggestions included allowing flexible use of street level spaces; promoting tall buildings which can provide increased office space, but also more public realm by having smaller footprints; greater integration of the City's buildings with its heritage; and encouraging infrastructure improvements.
- The City Property Association (CPA) commented that the Plan needs to be sufficiently flexible to allow the competing demands of policy to be achieved whilst allowing high-quality, sustainable development, but at the same time needs to avoid ambiguity.

**Question 2.3**

Are the five strategic objectives listed in paragraph 2.6 still relevant? If not, what should the key objectives be in the new Plan?

Number of comments: 23

- A clear majority of respondents (18) felt that the existing strategic objectives remain relevant, although some qualified this by suggesting amendments or additions to the current wording.
- Specific suggestions for additional objectives, or for issues that should be given greater prominence, included:
  - The GLA suggested a new objective focused on spreading the benefits of the City's investment and growth to all Londoners.
  - A new objective that the City remain internationally competitive as a business location in terms of its relative cost and quality.
  - A new objective to improve the quality of life for City residents, addressing health and wellbeing, including spiritual wellbeing.
  - Greater prominence to public realm, open spaces and the pedestrian environment.
  - A more proactive approach to the historic environment.
  - Addition of references to the River Thames and the Cultural Hub.

**Key Diagram**

Number of comments: 3

- A small number of respondents made comments relating to the Key Diagram from the adopted Local Plan.
- Historic Royal Palaces would like to see the Eastcheap Retail Link extended to the Tower of London, and a visitor route identified between the Monument and the Tower.
- The Port of London Authority asked for the new location of Blackfriars Millennium Pier to be identified.
- The Conservation Area Advisory Committee (CAAC) agreed with the intensification area at Farringdon but noted that protected views may make the area of intensification difficult to achieve.

**A World Financial and Business Centre****General Comments:**

Number of comments: 5

- More emphasis is needed on public realm and street activity.
- Newer sectors such as technology firms may want more than just corporate office space.
- There needs to be a close relationship between the City and the City Fringe.
- The potential for a policy on affordable space for SMEs should be considered.
- A balanced approach is needed between office development and complementary land uses to ensure continued job growth.

- The Plan should avoid being overly rigid or restrictive, with the market best placed to determine the format of future office provision.

## Offices

### Question 3.1

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 mix of land uses, including housing and hotels? What areas of the City should be outside of any identified core?

Number of comments: 23

- Eight respondents, including the GLA, supported the concept of a “commercial core”. The GLA asked for the core area to be more clearly defined.
- Four respondents were opposed to identification of a “commercial core”: as it would not be sufficiently flexible to adapt to changing trends; it could disrupt the commercial mix currently found and adversely affect the City office market; and the whole of the City should be seen as commercial core.
- TfL highlighted the possibility that the CAZ will not have enough capacity for anticipated employment growth into the 2040’s, and that the benefits of the City’s public transport links and agglomeration of office uses should be maximised rather than losing key sites to housing and other non-office uses.
- Flexibility was considered important with nine respondents suggesting it was necessary within the City (either in combination or separate to designating a “commercial core”).
- There was limited support for ending the City’s current exemption from office to residential permitted development rights, with some contrasting support for an Article 4 Direction requiring planning permission for all changes of use in the City to account for the intense competition for land.
- A number of respondents referred specifically to the Riverside as an area that should be outside the “commercial core”. The Riverside would benefit from a mixed-use approach, for example with cafés, restaurants and associated new public spaces.
- Six respondents stated that existing hotel and/or residential clusters should be outside any “commercial core”.
- The Barbican Association suggested that the City’s four residential wards should be outside a “commercial core”, while the Chancery Lane Association considered that residential use in this location would minimise office vacancies and add to the area’s vitality.

### Question 3.2

How should the Local Plan provide the flexibility in workspaces needed to address increased economic uncertainty and possible turbulence?

Number of comments: 7

- Responses suggested that there needed to be greater flexibility in office floorspace, particularly allowing for the conversion of larger buildings to provide space suitable for SMEs. The Plan should also provide for affordable workspace for SMEs.
- Alongside flexibility in the use of offices, respondents supported greater flexibility in lease terms for offices to enable easier adaptation to changing circumstances.
- Other comments considered there should be provision for live-work units in the City and a greater encouragement to joint working with the education sector.

### **Question 3.3**

Should we continue with the current approach of setting office floorspace targets with defined 5-year phases, or move to a different approach, possibly using a criteria based policy?

Number of comments: 6

- There was a mixed response to this question, with some support for moving away from floorspace targets to a more flexible, criteria-based policy. There was also support for the retention of specific targets, albeit they need to take account of the greater density of occupation of space.
- The CPA, while supporting the retention of targets, acknowledged that we are entering a period of some uncertainty following the EU referendum result and that the Plan should provide sufficient flexibility in terms of office policies and associated viability matters.
- No-one specifically commented on the merits or otherwise of 5-year phasing.

**Question 3.4**

How should the Local Plan encourage new and emerging employment sectors? Should we aim to maintain the City's distinctive employment base, with a concentration of financial and business services, or diversify more?

Number of comments: 9

- All respondents supported a more diversified employment base. Benefits cited included creating more vibrancy at weekends and providing more resilience against economic crises. The Plan should address growth in a number of sectors, particularly creative and tech sectors.
- Some respondents qualified this support with the observation that diversification should not be at the expense of losing the City's historic function as a global financial hub.
- The CPA suggested that flexibility is required to support SMEs' changing working patterns and emerging sectors, such as Fin Tech and the TMT sector. It would like to see the Plan being 'outward looking' in terms of its relationship with the adjoining boroughs.
- The GLA commented that policies to encourage a diverse range of employment uses would be welcomed, especially in areas which have potential to support specialisms and agglomerations outside the commercial core.

**Question 3.5**

How important is it to use policy to protect a range of office sizes and employment opportunities? Should we have specific policy protection for offices suitable for Small and Medium Enterprises (SMEs)? What type of floorspace are SMEs looking for?

Number of comments: 7

- Respondents were generally positive about protecting a range of office sizes and promoting space for SMEs but highlighted the need to understand their requirements and to consider refurbishment before replacement in smaller developments.
- It was suggested that Section 106 Agreements could be used to deliver subsidised office accommodation, and that the City Corporation could offer subsidised rents as well as providing a range of office sizes and types within its own property holdings.
- The CAAC welcomed the provision of office space for SMEs, noting that SMEs were more likely to seek out sites in fringe areas where floorspace is less expensive.
- The area around Chancery Lane was identified as being appropriate for a mix of residential and smaller office units that could accommodate SMEs.

**Question 3.6**



Are large floorplate offices still required in the City? Should more flexible floorplates and building designs be encouraged to support new ways of working?

Number of comments: 7

- All respondents agreed that there should be flexibility in the provision of office floorspace to respond to changing demands and working practices and to accommodate more diverse, smaller businesses.
- Three respondents, including the GLA, stated that there is likely to be a continuing need for some large floorplate occupiers in the City and that policy should facilitate a range of sizes and types of employment.
- The CPA felt that the planning system should not engage in determining floor plate sizes.

## Utilities Infrastructure

### Question 3.7

How can we ensure that the necessary infrastructure is planned for and installed in a timely and cost-effective manner? Could the City Corporation instigate a more strategic and collaborative approach to implementation and funding of utility infrastructure?

Number of comments: 9

- There was support for a more strategic and collaborative approach to infrastructure provision in order to ensure the City's resilience, including from the CPA.
- The GLA highlighted the importance of taking a long-term view of the needs of various utilities as well as measures to reduce the demands of new development on such infrastructure.
- It was suggested that specific reference be made to low emissions/green infrastructure.

**Question 3.8**

How can we influence the development of digital connectivity infrastructure ensuring that it is effective but does not detract from the significance of heritage assets or obstruct streets and pavements?

Number of comments: 11

- Respondents supported an objective to achieve full 4G coverage across the City. Various options for delivering digital connectivity were suggested, including:
- Using street furniture to relay local Wi-Fi
- Rolling out BT's LinkUK programme to the City.
- The CPA stressed that digital and telecommunications infrastructure must continue to be prioritised, to ensure the City is able to compete with other world cities.
- Historic Royal Palaces highlighted that provision of digital infrastructure needs to be handled sensitively and not have adverse effects on heritage assets.
- Ensuring that the utilities required for the Square Mile are delivered was highlighted as vital to the software needed at the Museum of London.

**Question 3.9**

Are there further mitigation measures which could be considered to reduce the disruption caused by construction activity in the City? How can we influence the provision of suitable utilities infrastructure for construction sites, ensuring it does not result in unacceptable air quality, noise and vibration impacts or affect the utilities capacity available for neighbouring properties?

Number of comments: 7

- Noise and pollution impact from construction sites were a theme of four responses, including from the Barbican Association. Suggested actions included strict codes of conduct, full consultation with neighbours, tougher standards during construction, restrictions on noisy night-time working and greater use of off-site assembly
- More use should also be made of solar panels and low DC voltage internal systems to reduce demand on the mains electricity supply, while local composting networks should be considered for foul waste.

## Safety and Security

### Question 3.10

What are the key issues concerning night-time entertainment? Should we identify areas of the City either to promote or restrict night-time entertainment uses? If so, which areas would you suggest? Would clear dispersal routes help to minimise the impact of night-time venues?

Number of comments: 16

- A key theme was the need for clear dispersal routes (10 responses).
- Provision of more night-time uses was suggested by four respondents, with areas of potential growth highlighted in the Farringdon/Barbican/St. Paul's area and on the north bank of the Thames.
- Four respondents recommended that there should be restrictions on entertainment uses and the size, number and concentration of bars, particularly in residential areas. However, there was also support for restrictions on night-time entertainment where it impacts on more dispersed residential properties.
- The Barbican Association suggested restrictions should apply in the residential wards, and the Chancery Lane Association identified Chancery Lane as unsuitable for the promotion of nighttime entertainment uses other than bar and restaurant uses subject to normal hours restrictions.
- Six respondents drew a distinction between different night-time uses, suggesting this should be addressed in the Plan.
- The GLA indicated there may be opportunities for offering an improved night-time economy in light of the City's good public transport and relatively low resident population.
- The need for a collaborative approach between planning, licensing, environmental health and policing was expressed by a number of respondents, as was the need for night toilet facilities near tube stations and licensed premises.

### Question 3.11

How can buildings and spaces be designed to create a safe and permeable public realm while protecting against security threats?

Number of comments: 12

- Five respondents suggested that overlooking, pleasant lighting and complementary adjoining uses such as pavement cafes would increase safety and security. Hostile vehicle mitigation should be permitted where there is a need and should be designed to complement the streetscape.
- Other measures mentioned included CCTV and well-designed public realm, and an area-wide approach.
- There was support from the GLA for the Local Plan to give detailed consideration to security.

**Question 3.12**

Should we include further planning policy measures to tackle crime and anti-social behaviour? If so, what measures?

Number of comments: 12

- All respondents agreed that additional measures could be implemented to tackle crime and anti-social behaviour.
- Six responses highlighted the role of the design of public spaces and buildings in tackling crime and anti-social behaviour.
- Historic Royal Palaces highlighted public areas around the Tower of London where appropriate measures to address crime and anti-social behaviour would be welcomed.
- The Chapter of St Paul's Cathedral would welcome clearer design policies for the public realm, combined with active policing and management, to limit activities that can damage the environment such as skateboarding.
- More cameras and stricter enforcement were suggested.
- Provision of facilities for the homeless.

**Key City Places****General comments**

Number of comments: 5

- All responses referred to the need to improve the Riverside Walk, with the PLA supporting measures to address current gaps on the Thames Path.
- Four respondents suggested measures to improve the appearance and pedestrian permeability of Lower Thames Street.

**Question 4.1**

Should the concept of Key City Places be retained in the new Local Plan? Should we continue to focus only on areas where significant change is expected? Should they be renamed as Areas of Change?

Number of comments: 13

- Six respondents, including the GLA, the CPA and Historic England, supported the concept of place-based policies, with no-one suggesting they should be removed from the Local Plan.
- There was no firm view on whether the term Key City Places (KCPs) should be retained, or amended to Areas of Change
- Four respondents expressed concern that the KCPs are shown as 'vague blobs' and suggest defining precise boundaries on a map. However, the CPA, while supporting area-based policies, felt that they need to be sufficiently flexible and adaptable to be able to reflect and respond to emerging market and economic changes.
- Historic England expressed concern that the extent and justification of the current KCPs appear to be driven by the demand for development and its form, rather than by an evaluation of their historical development and resulting characteristics.

**Question 4.2**

Are there other areas of the City not mentioned in the questions below that require a particular policy focus? If so, please state why.

Number of comments: 7

- Areas suggested by respondents that require a particular policy focus were:
  - The western part of the City (areas between Fleet Street, Chancery Lane, Holborn Viaduct/Holborn and Farringdon Road);
  - The area around St Paul's Cathedral.
  - The Chancery Lane area.
- The GLA stated that reference should also be made to the London Plan areas of change which lie close to the borders of the City, namely the City Fringe/Tech City Opportunity Area and the Farringdon/Smithfield Area for Intensification.
- The CPA mentioned the need for new and updated area policies for Smithfield/Cultural Hub; Liverpool Street/Broadgate; Aldgate; and Eastern Cluster.
- The Barbican Association suggested that the residential wards should be treated differently to the rest of the City, and given more protection from excessive development, evening and night-time activity, noise and light pollution.

**The North of the City/Cultural Hub****Question 4.3**

Should the North of the City continue to be considered as a single Key City Place, or should we focus attention on two specific Areas of Change: the Cultural Hub in the North-West and the Liverpool Street/Broadgate area in the North-East?

Number of comments: 12

- Overall, eight respondents agreed that the North of the City KCP should be divided into two specific areas
- Four respondents thought the east and west of Moorgate are quite different in character and suggested that the area west of Moorgate should be part of a Cultural Hub KCP, while the area east of Moorgate is dominated by offices and no different from the main fabric of the City.
- The Museum of London noted that the Smithfield/Barbican area will be transformed by the Elizabeth Line, the new Museum and Beech Street and commented that a particular focus on this area may be helpful in the years ahead.
- There was no firm view on whether Liverpool Street/Broadgate should be identified separately as a KCP, with one suggestion that it should be incorporated into the Eastern Cluster.

**Question 4.4**

What new issues will we need to consider in the Local Plan as the Cultural Hub develops? What other land uses, and facilities will be required to support the emerging Cultural Hub, and how can these be accommodated whilst protecting residential amenity? How can we balance the needs of larger numbers of pedestrians with vehicles that are essential for the running of Smithfield and St Bartholomew's Hospital?

Number of comments: 15

- Four respondents indicated that the key challenges to address are improving permeability; creating active frontages to new buildings; providing signage and wayfinding cues to assist visitors; and linking the Cultural Hub to Farringdon Station. Other suggestions included the widening of pavements; better designated cycleways; time separation of pedestrians and vehicles; and creating more pedestrian routes and providing more visitor accommodation.
- The CPA indicated that it fully supports the Cultural Hub initiative and the diversification of uses, where appropriate, to ensure the initiative is a success.
- The Barbican Association indicated that the Local Plan needs to consider the balance between the activities of the Cultural Hub and the residential area it sits within. It suggested limits on night-time activities in open areas near residential flats.
- Beech Street should be a priority area for reduced traffic, increased pedestrian use and an improved environment, while an upgrade is required to the whole area around Barbican Underground station, including step-free access.

#### **Question 4.5**

How should the business environment around Liverpool Street be planned? Should there be increased support in the Local Plan for technology sector companies, particularly seeking to provide more flexible and adaptable workspaces? What challenges will this bring and how can they be addressed?

Number of comments: 7

- Five respondents supported promoting business intensification and flexible workspaces in the Liverpool Street/Broadgate area.
- The CPA highlighted the importance of the Liverpool Street/Broadgate KCP being sufficiently outward looking to ensure policies take advantage of the adjacent markets in other boroughs. The new Local Plan should increase support for the technology sector and other markets in the City Fringe, with support for this approach also expressed by neighbouring boroughs.

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

##### **Question 4.6**

Is there a need to retain a specific policy for Cheapside and St Paul's as a Key City Place? Should the area be modified? If so, how?

Number of comments: 13



- Eight respondents felt that Cheapside and St Paul's should be retained as a KCP, reflecting its distinctive character as a result of the 7-day a week vibrancy created by One New Change. The potential for extending the area to include retail streets east of Royal exchange was mentioned.
- The Chapter of St Paul's Cathedral referred to the need for integration with the Cultural Hub and opportunities for reinforcing the identity and significance of St Paul's as one of the 'key spaces' in London.
- Three respondents felt that there is no need to retain a specific area-based policy as most of the likely changes have already occurred or will do so shortly.
- The CPA commented that the highway proposals and associated change at Bank Junction could be covered by a specific transport policy on this topic, rather than a KCP policy.

#### **Question 4.7**

How can the area provide greater appeal to visitors, workers and shoppers?  
How should it link to the proposed Cultural Hub to the north?

Number of comments: 9

- Most of the respondents commented that improvements are needed to draw visitors from Cheapside to the Cultural Hub. Suggestions included public art on St Martin's Le Grand and Greyfriars Church Garden; traffic reduction measures including road closures; and the provision of more independent stores.

### **Eastern Cluster**

#### **Question 4.8**

Should further intensification be encouraged within the Eastern Cluster?  
Should the current policy area be retained, or should it be modified? If so, where and how?

Number of comments: 10

- This question produced no clear agreement, with half the respondents (5) being broadly supportive of further intensification within the Eastern Cluster and the other half expressing concerns about further intensification.
- Amongst those who were supportive, the CPA pointed to the transport upgrades coming forward at Bank Underground and Liverpool Street Station, while the GLA highlighted the area's excellent public transport links as well as some under-used land and buildings and a relative lack of constraints compared to other areas.
- There was also support for a positive approach to tall buildings to add certainty for developers and tenants alike.
- Respondents who did not support further intensification cited concerns about the shortage of open spaces in the area and about whether the

streets and public realm can cope with the increased number of people.

- Historic Royal Palaces was concerned about the continuing increase in height and scale of buildings within the Eastern Cluster and its impact in views of the Tower of London World Heritage Site (WHS) and the related gradual reduction in visual separation between the cluster and the WHS. HRP would oppose any infilling of the gap between the current cluster and 20 Fenchurch Street, and to the development of taller buildings in the Aldgate area which would lie within the protected vista of LVMF view 25A.1 from Queen's Walk.
- Historic England commented on the need to make publicly available 3D modelling of the Eastern Cluster in the interests of transparency, and also recommended greater clarity on the development and design parameters for future proposals.

#### **Question 4.9**

What changes would be needed to existing infrastructure to accommodate further intensification in the Eastern Cluster?

Number of comments: 6

- safer streets for cyclists.
- segregated infrastructure.
- pedestrianisation.
- increasing footway widths.
- improved crossing facilities.
- better freight handling.
- alternative walking routes through development sites; and
- improved travel demand management at peak times.

#### **Question 4.10**

Should special emphasis be placed on the public realm to cope with increased pedestrian movement in the Eastern Cluster? Should we be pedestrianizing streets in the Eastern Cluster and creating more open spaces through buildings? What routes through the Eastern Cluster should we improve?

Number of comments: 13

- All but one of the respondents agreed that emphasis should be placed on public realm improvements, and 11 out of 13 mentioned the need for new or improved pedestrian routes.
- Five respondents supported the public art programme in the Eastern Cluster and suggested the need for a specific public art policy.
- The GLA indicated that strengthening pedestrian connections east and into Tower Hamlets would be a positive strategic objective.
- TfL commented that special emphasis should be placed on measures to improve the capacity of the public realm to cope with increased pedestrian movements.

- The CPA supported opportunities for pedestrianisation or timed restrictions on traffic and also potentially opportunities for shared surfaces.
- Five respondents argued that pedestrian routes through buildings are only desirable if they are under a glazed roof and animated with retail, such as at Leadenhall Market and One New Change. Undercroft space should not be accepted as a substitute for public open space.

## Aldgate

### Question 4.11

Does the Aldgate area still merit its own Key City Place? If so, should the area be extended to become an East of City area including the area around Tower Hill and/or Middlesex Street? What should be the main policy focus of any newly designated area?

Number of comments: 14

- No responses argued for the deletion of this KCP.
- Five respondents suggested a specific boundary for the Aldgate KCP, which would be slightly larger than the current area.
- Four respondents supported the idea of extending the Aldgate KCP to become an East of City area. The CPA commented that this extended KCP could draw on the Mayor's City Fringe SPG, where appropriate.
- Historic Royal Palaces expressed concern about any change to the designation or extension of the existing Aldgate area that might encourage new tall buildings in this area of high sensitivity in the backdrop to the Tower of London.
- In terms of the policy focus, suggestions included balancing community needs between residential, offices and visitors; promoting vibrancy and mixed uses; improving connectivity and sustainable transport; and street scene/public realm enhancements.

### Question 4.12

How can the amenity of residents in the Aldgate area be protected within a lively mixed-use environment?

Number of comments: 8

- The major concern was the impact of the night-time economy on residents, with the majority of respondents (5) wanting greater protection from nightclubs and bars.

## Thames and the Riverside

### Question 4.13

What mix of land uses will be appropriate on the City's riverside over the next 20 years? Should the Local Plan provide clearer, more prescriptive guidance on the development potential and appropriate uses of sites along the riverfront?

Number of comments: 15

- Eight respondents supported a wider mix of uses, to include cafes and restaurants; sports and recreational facilities; cultural venues; offices; hotels; residential; and outdoor public space, although a minority of respondents were concerned about the impact of change on the area's peace and tranquillity.
- Comparison with the South Bank was raised by several respondents,
- The CPA stated that it sees no immediate need for further or more prescriptive policies for this area, nor is there an overwhelming case for promoting one particular land use over any other.

#### **Question 4.14**

Should we seek greater use of the River Thames for transport, for example by retaining and enhancing river transport infrastructure at Blackfriars Pier (when relocated) and Walbrook Wharf, and the reinstatement of infrastructure at Swan Lane Pier? Should we promote the use of the river for future servicing of buildings in the City?

Number of comments: 13

- All of the responses supported greater use of the river for transport purposes.
- TfL and the Port of London Authority (PLA) were supportive of the potential use of the river for deliveries and servicing, while the GLA indicated that use for movement of demolition waste and construction materials should be considered.
- However, five respondents argued that use of the river for servicing should only be allowed where this does not interfere with pedestrian use of the Riverside Walk.
- Nine respondents specifically supported bringing unused piers back into operation, with several indicating that this would help reduce current congestion at Tower Pier.
- TfL and the PLA supported investigating the potential reinstatement of Swan Lane Pier, and both added that the City Corporation should also consider the possible reinstatement of Custom House Pier.

#### **Question 4.15**

Should we continue to maintain the current openness of the river by refusing development on or over the river, reinforcing the flood defences and protecting the foreshore for biodiversity?

Number of comments: 13

- This question prompted a difference of views. Seven respondents agreed with the question, identifying the openness of the river landscape as being a key feature of the City environment. However, five suggested a more flexible approach to development is needed, which would be consistent with creating a vibrant Riverside Walk, while securing the necessary flood defences and future maintenance of the river bank.
- The Environment Agency stated that development on or over the river should be resisted, pointing out the benefits for amenity and

biodiversity and the need for inspection, maintenance and improvement of flood defences. The Environment Agency would also like redeveloped buildings to be set further back from the river to enable future flood defence raising and more amenity space.

## **City Culture and Heritage**

### **General comments**

Number of comments: 7

- The majority of comments expressed general support for the City Corporation's positive approach to protecting the historic environment and the need for the City Corporation to do all it can to protect the historic environment.

## **Design**

### **Question 5.1**

What are the new design issues for the City that we need to consider in the Local Plan review? Should more detail be included in the design policies?

Number of comments: 15

- Five respondents suggested that the City should adopt a more considered and coherent approach to the massing of buildings.
- There were different views on the policy approach to advertising. There was some support for the current restrained approach, but also a view that the existing policies are far too rigid, prescriptive and detailed.
- The CPA considered that the City's current design policies are working well and did not see any immediate need for significant revision.
- The Barbican Association requested the exclusion of the effects of balconies from daylight and sunlight calculations; called for planning conditions to restrict the use of roof terraces which overlook residential clusters after 7pm; and suggested limits on the use of plate glass windows to reduce light exposure and improve privacy.
- The Chapter of St Paul's Cathedral referred to development impacts such as daylight, wind, noise, pollution and pedestrian flows, and noted that impact assessments on planning applications sometimes fall short of expectations. The Chapter would welcome stronger guidance which ensures quantifiable standards are achieved.

## **Visitors, Arts and Culture**

### **Question 5.2**

Are there certain areas of the City where hotel development is inappropriate, or where hotels should be encouraged? Should these areas be identified in detail or more generally?

Number of comments: 12

- The majority of respondents (8) supported hotel development in principle, with one opposed to any further hotels at all and one supporting the development of hostel type accommodation rather than hotels.
- New hotel development should be located near transport hubs or major visitor attractions, and large hotels should only be on sites which are suitable for taxi and coach drop-off and servicing.
- The GLA welcomed additional hotel accommodation in principle providing the other functions of the CAZ were not compromised. City fringe areas with good public transport access were suggested as best able to support this fine balance. However, a neighbouring borough highlighted that it has limited capacity for new hotels.
- The CPA indicated that hotels should be allowed where appropriate and where they support the overall mix of the City. Hotels could be encouraged in the Cultural Hub, but in general each site should be considered on its individual merits.
- Another respondent suggested that St Paul's and Farringdon/Barbican/Smithfield might be areas for consideration.

### **Question 5.3**

Should we set a target for the number of new hotel bedrooms or hotels in the Local Plan? If so, what do you think that target should be?

Number of comments: 5

- There was no support for including a target within the Local Plan.
- The Barbican Association stated that hotel growth should be restricted to areas adjacent to St Paul's which would serve both the business City and the Cultural Hub.

### **Question 5.4**

Should accommodation for business visitors to the City be prioritised over accommodation for tourists? If so, what role can the planning system play in ensuring this is delivered?

Number of comments: 12

- Five respondents argued that it would not be practical to prioritise hotel accommodation for business visitors because hotels trade seven days a week and cater for a mix of visitor types.
- There was some support for catering principally for tourists (2 responses) and some for prioritising business visitors (3 responses).
- Several respondents pointed out that the introduction of Crossrail and 24-hour tube services will enable easier access to the City for visitors from other parts of London.

### **Question 5.5**

Should the Local Plan encourage uses and activities which could attract more visitors? Should this include on-street activities? What type of activities would be appropriate in the City and what types would be inappropriate?



Number of comments: 18

- A majority of respondents (12) supported uses and activities which could attract more visitors, with several observing that the City Corporation's Visitor Strategy and Cultural Strategy already encourage more visitors and that the Local Plan should follow suit.
- Nine respondents expressed specific support for on-street activities, with a number saying this would bring more vitality to the City in the evenings and at weekends. Suggestions included appropriate seating; public art; wayfinding; public toilets; litter collection; street markets and catering uses along main tourist routes; 'changing places'; and facilities for people with disabilities.
- A minority of responses were opposed to on-street activities for reasons including disturbance to residents, poor air quality and congested roads.
- The need for a high-quality public realm at locations such as the Eastern Cluster and West Smithfield was mentioned.

## Historic Environment

### Question 5.6

How can the Local Plan help new development conserve and enhance the significance of heritage assets? What should the Local Plan say about the setting of heritage assets? Should we include policies and guidance within the Local Plan on non-designated heritage assets?

Number of comments: 12

- This question prompted a range of comments with no overall consensus.
- There was some support for the protection of non-designated heritage assets through policy, but also a concern that such policies would not add value and that proposals should be dealt with on a case-by-case basis.
- Historic England welcomed the Corporation's commitment to developing a Historic Environment SPD, with clear policy hooks in the Local Plan to help inform the management of all heritage assets and their settings. Historic England also suggested a policy that encourages heritage-led regeneration.
- The Barbican Association would like to see the Barbican and Golden Lane estates designated as conservation areas.

### Question 5.7

How can heritage assets be used in the most adaptable and flexible way to boost their future relevance without harming their significance?

Number of comments: 8

- It was noted that the proposed relocation of the Museum of London to Smithfield is a good example of reusing a heritage asset.
- The Barbican Association was concerned at the impact of oversized development on the Barbican and suggested that the Highwalks could be extended to increase pedestrian safety.

### Question 5.8

Should there be a specific policy that protects the setting and Outstanding Universal Value of the Tower of London World Heritage Site?

Number of comments: 11

- Seven respondents, including HRP and Historic England supported the inclusion of a specific policy protecting the Tower of London World Heritage Site (WHS).
- Three respondents felt there was no need for a specific policy as existing policies combined with WHS designation should be sufficient to protect the setting of the Tower.

## Protected Views

### Question 5.9

Should we maintain the current approach to local view protection in the City?  
If not, how should the approach be changed, and which views should be affected?

Number of comments: 13

- There was widespread support for retention of the current Local Plan approach to view protection.
- Historic England suggested that additional policy consideration be given to views from within conservation areas and HRP requested that updated guidance on the Tower of London be taken into consideration.
- The Chapter of St Paul's Cathedral indicated support for current view protection, but also drew attention to recent publicity that had identified shortcomings with the protection afforded by the London Views Management Framework.

#### **Question 5.10**

How do the current view protection policies affect development in the City?  
What would be the impact on development in the City if the view protection policies were changed?

Number of comments: 9

- All but one of the responses felt that view protection policies helped protect the City's character and 'uniqueness' and allow for better orientation around the City.
- The CPA suggested that any review of local view protection should be undertaken as part of the Mayor's review of the London View Management Framework.
- Historic Royal Palaces expressed concern about any reduction of current view protection policies which could increase the impact of major development on the setting of the Tower of London WHS.

#### **Question 5.11**

Should we be recognising and protecting new views from publicly accessible locations? If yes, which ones?

Number of comments: 7

- Five respondents supported in principle the protection of new views, while two respondents were against. Locations suggested for new views were from the Sky Garden at 20 Fenchurch Street or the view of St Pauls from One New Change.

### **Tall Buildings**

#### **Question 5.12**

Should we continue to promote tall building development in the City and should these buildings continue to be clustered? Should the current tall building cluster in the east of the City be altered? Are there any other areas of the City which could accommodate tall buildings without compromising its distinctive character and heritage?

Number of comments: 26

- This question prompted an even split of opinions. 11 respondents were broadly supportive of further tall buildings in the City, while 11 either raised concerns or called for no more tall buildings to be permitted.
- Nine responses specifically supported the continued clustering of tall buildings, although there were some critical comments about the design quality of the Eastern Cluster and recognition that concentrating the densest development is likely to put more strain on local infrastructure including transport and public realm.
- A number of respondents were concerned about the impact of tall buildings on City churches or other listed buildings, as well as open spaces, in terms of overshadowing or loss of character.
- The GLA supported the City's approach providing it is backed by clear locational guidance and robust policy to secure high quality design.
- The CPA argued that high density development in tall buildings represents a sustainable form of development where they form clusters. The CPA added that policy should not preclude tall buildings outside the Eastern Cluster.
- The Barbican Association commented that continued development of tall buildings seems inevitable given the constraints on space but called for clusters of tall buildings to be precluded around residential areas.
- Historic Royal Palaces reiterated concerns about any potential expansion of tall buildings, particularly in the area around Aldgate.
- The Chapter of St Paul's Cathedral expressed concern that if the primary Eastern Cluster were to extend well beyond the original boundary, this would be detrimental to the general character of the City, not just the wider setting of St Paul's.
- Three neighbouring boroughs responded to this question. Tower Hamlets expressed concerns about the potential impact of the intensification of the Eastern Cluster on the Artillery Passage Conservation Area and the Tower of London. Hackney expressed a desire to work with the City with regard to the development of tall buildings in the vicinity of Liverpool Street, and Islington commented that future proposals are likely to be more appropriate where they correlate with existing clusters.
- Liverpool Street was mentioned in a couple of responses as an area which could be suitable for more tall buildings.

### **Question 5.13**

What more should we do to address the wider impacts of tall buildings proposals, such as pedestrian movement, public realm, micro-climate and wind mitigation? Are there any other factors to consider?

Number of comments: 15

- The majority of respondents agreed that the impacts mentioned in the question were important, but a range of factors were raised:

- Five respondents considered that new tall buildings should be required to provide well designed, publicly accessible, open spaces
- Several respondents suggested that special regard should be paid to heritage assets and their setting.
- Other factors that were mentioned included solar reflection/glare, daylight/sunlight impacts and the need for building protection measures to be fully integrated into the fabric of the building.
- The Chapter of St Paul's Cathedral encouraged the use of visualisation tools to gain a better understanding of the development capacity of the tall buildings cluster, so that the impacts of change can be assessed, and proposed change is evidence-based.
- The Environment Agency considered it important to have regard to the proximity of tall buildings to the River Thames and any impacts on the integrity of existing flood defences or the shading of the foreshore.

#### **Question 5.14**

Should the Local Plan include a reference to the CAA's London Tall Building Policy and its intention to object to proposals exceeding 305m AOD in order to give more comprehensive policy guidance in the Local Plan?

Number of comments: 13

- The majority of respondents (10) agreed that a reference should be added into the Local Plan to provide more comprehensive policy guidance.

## **Environmental Sustainability**

### **General comments**

Number of comments: 15

- Around half of these general comments focus on transport related issues.
- Reducing noise, light and air pollution and improving conditions for walking and cycling were supported.
- TfL commented that this section had little mention of public transport and particularly buses and the Local Plan should recognise the important role of buses within the hierarchy of transport in the City and set out a vision for their future role.
- TfL also requested that dedicated taxi ranks should be accommodated in new development.
- The Museum of London noted the importance of planning effectively for deliveries and coach visitors, alongside public transport and cycle parking.
- Historic England commented that climate change measures should be balanced against the need to preserve and enhance the historic environment.

## **Sustainability and Climate Change**

**Question 6.1**

Should we identify and positively plan for infrastructure such as district heating and smart grid technologies to enable a more sustainable, low carbon future for the City? What technologies and infrastructure are likely to be viable and operationally feasible in the City? Should they be required in certain types of developments?

Number of comments: 10

- The majority of respondents (9) supported positive planning to enable a more sustainable, low carbon future City.
- There was specific support for district heating and smart grid technologies. Other technologies which were mentioned included green infrastructure, solar energy, high tech insulation, recycling, sustainable transport, low energy lighting and air source heat pumps.

**Question 6.2**

What type of climate resilience measures should be incorporated into new development, refurbishment and the public realm? How should such measures be secured?

Number of comments: 8

- The majority of respondents (7) were in favour of climate resilience measures. A range of measures were identified including sustainable drainage systems (SuDS), management of water use and rainwater run-off, green infrastructure, green roofs and walls and measures to avoid the creation of wind tunnels.
- Respondents suggested that resilience must extend to cover transport, ICT and public realm as well as buildings. Refurbishment of buildings was noted as being more sustainable than demolition and rebuild.
- The GLA commented that temperature control in glazed and tall buildings is an issue which merits attention in the Local Plan.

**Question 6.3**

Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?

Number of comments: 10

- All respondents supported the proposal to identify and encourage specific local environmental protection measures.
- Air quality measures proposed included reducing the numbers of vehicles; restrictions on parking and allocating more road space for walking and cycling; promoting cleaner vehicles and tightening vehicle emissions standards; vehicle free days and enforcement of no vehicle idling legislation. Improved planting and greening and water management. Enclosing waste sites to prevent dust was also suggested.
- There was support for some of these measures to be implemented through the planning system with requirements for Air Quality



Management Plans to be submitted with planning applications. Expansion of the Low Emission Neighbourhood to cover areas such as Thames Street, Victoria Embankment and Bishopsgate was suggested.

- Water management measures proposed include SuDS to improve water quality and reduce rainwater run-off, and promotion of water efficiency measures
- Noise control was promoted by the Barbican Association, through the adoption of tougher noise standards for contractors, stronger enforcement and restrictions on noisy work on Saturdays in residential areas.
- Light pollution was also raised by the Barbican Association, which called for a robust approach towards offices that cast intrusive light into dwellings. Other respondents suggested offices should have automatic light sensors when rooms/floors are unoccupied, and for the use of solar powered street lighting.

## Transport and Motor Vehicles

### Question 6.4

What actions could the City Corporation take to reduce congestion in the City?

Number of comments: 16

- A wide range of suggestions were made in response to this question, including banning private cars during normal working hours; making all other vehicles zero emission; reviewing delivery times; improving public transport; encouraging walking and cycling; increasing car parking charges; better use of existing car parking for alternative uses; and enforcement of the 20mph speed limit.
- TfL suggested incentivising off-peak servicing and deliveries; improving conditions for cyclists and pedestrians; improving bus journey times and making efficient use of space on the roads.
- The CPA supported in principle the use of consolidation centres for new major developments, together with re-timing of delivery and servicing trips outside of peak hours. In addition, there may be an opportunity to reduce bus service frequencies from 2018 onwards with the opening of Crossrail and completion of underground line upgrades.
- The CAAC noted that street clutter impedes pedestrian movement and asked for a policy requiring the removal of redundant street clutter.
- Other suggestions included developing strategic infrastructure tunnels to reduce the frequency of street works in the long-term; preventing motorised traffic from using Beech Street; and making “direct vision” lorries with minimal blind spots the standard HGV type in the City.

### Question 6.5

Should occupiers of large developments be required to only accept deliveries outside peak periods, including at night-time? Should medium-sized buildings be required to provide off-street servicing areas?

Number of comments: 12

- The majority of respondents (8) welcomed the idea of deliveries being made outside peak periods, including at night-time.
- Three respondents were opposed to off-peak/night-time deliveries due to the impact on residential amenity and because the commercial sector would be undermined by such restrictions. It was suggested that deliveries be made in the early morning where feasible.
- The CPA acknowledged that off-peak servicing may not be achievable for all existing buildings and suggested it should be particularly encouraged for large scale schemes which can also work with a consolidation centre.
- TfL referred to its London wide retiming programme which encourages deliveries taking place outside of peak hours and indicated that delivery time periods should be considered within delivery and servicing plans on a site by site basis.
- Off-street servicing for medium-sized buildings was supported by five respondents, albeit with a caveat that this is not always possible in

such buildings. The CAAC expressed concern that compelling off-street servicing for medium sized buildings would result in bland inactive frontages and lack of street activity.

**Question 6.6**

Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?

Number of comments: 16

- A clear majority of respondents (14) agreed in principle with the promotion of consolidation centres.
- TfL welcomed the promotion of consolidation centres in principle and referred to a number of different types of consolidation, such as procurement led/supply chain solutions and micro consolidation centres.
- The CPA noted consolidation centres could bring a range of benefits, including serving developments in a specific area such as the Easter Cluster.
- Team London Bridge (a Business Improvement District) indicated that it will be investigating options for a consolidation centre in south London and suggested that the City should only seek options north of the river to avoid worsening congestion on key routes across the river.
- Two respondents questioned whether decanting deliveries into smaller vehicles would in fact reduce congestion. Consolidation centres near residential properties would be inappropriate as they operate 24 hours a day.
- Other comments referred to the need to reduce the growing numbers of personal deliveries made by LGV's to City workers.

**Question 6.7**

How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

Number of comments: 16

- 12 respondents commented on the use of electric vehicles and supported the need to provide charging points in accessible locations. However, respondents also noted that the increased use of electric vehicles will not reduce congestion.
- TfL highlighted the introduction of the Ultra-Low Emission Zone, which will help to tackle poor air quality.
- The CPA commented that advertising safer cycle routes to destinations in the City could encourage more commuters to cycle to work. There should be further provision of electric vehicle charging points in all new developments and existing where possible. Charging points should also be provided in loading bays.
- Other suggestions included incorporating air filters/extractors into heavily polluted places; transferring existing car parking spaces to car-sharing schemes; reducing on-street car parking; car-free days; and provision of consolidation centres and cargo bikes.
- Promoting other modes of transport was a common theme. The London Cycling Campaign commented that cycling infrastructure has been shown to dramatically boost health outcomes, with spending outranking all other transport modes for return on investment.
- Team London Bridge highlighted the potential for urban greenery, wider pavements and street trees to help mitigate poor air quality on both sides of the river.

**Pedestrians, Cyclists and Motorcyclists****Question 6.8**

How can more open space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianized or time limited, or should certain types of vehicles be restricted in those areas?

Number of comments: 13

- Eight respondents supported restrictions on vehicular movements in some areas and at certain times. Respondents generally favoured restrictions at peak times or the narrowing of roadways to provide more space for pedestrians or cyclists.
- TfL commented that it is vitally important that planning decisions take account of the need to keep developments and street permeable.
- The CPA noted that footway widths will become a huge constraint on future pedestrian flows in the Eastern Cluster and recommended the transfer of vehicular carriageway space to additional pedestrian space.

Ground floor pedestrian passages or retail arcades should be encouraged through major new developments.

- Other comments included support for limiting general traffic at Bank Junction, support for the potential pedestrianisation of St Paul's Churchyard and reference to Cheapside being a model that could be used elsewhere.

#### **Question 6.9**

Should the requirements for cycle parking in developments be increased, remain the same or be decreased? Should large developments be required to provide off-street public cycle parking spaces?

Number of comments: 10

- Most respondents were supportive of cycle parking in new developments, with five calling for increased levels of cycle parking.
- The CPA argued that the London Plan cycle standards are already challenging for many schemes and is about the right standard for the next decade. Public cycle parking within private developments would be impractical and likely impossible for reasons of capacity and security.
- The London Cycling Campaign highlighted the importance of showers and changing facilities as well as cycle parking.
- While there was some support for more on-street cycle parking, a number of comments also referred to the need to avoid further street clutter. TfL suggested that the City Corporation should consider innovative cycle parking solutions that would minimise street level space requirements, such as underground parking.

#### **Question 6.10**

Should there be more on-street or off-street motorcycle parking in the City?

Number of comments: 7

- The majority of respondents felt that no more motorcycle parking is required and that this should not be seen as a priority.
- TfL commented that provision of on and off-street motorcycle parking would come as a trade-off against space for cycle parking, pedestrians and amenity space.
- The CPA recommended that the City explores the use of electric bikes as a potential replacement of motorbike trips.

### **Waste and the Circular Economy**

#### **Question 6.11**

What measures could we include to secure waste reduction associated with development? Should we promote circular economy principles, zero waste plans and on-site management of waste for large developments?

Number of comments: 13

- All respondents were in favour of waste reduction measures with seven specifically supporting promotion of the circular economy, six

supporting on-site waste management on large sites and four supporting zero waste plans.

- Specific measures suggested included promotion of reuse and recycling of demolition waste; use of 100% recyclable packaging by food and drink outlets; anaerobic digestion and on-site management of food waste; and ensuring Barbican residents make full use of its existing waste collection and recycling system.
- Some respondents considered that collection and handling of waste and recyclables should be designed into development from the outset, and the Environment Agency highlighted the London Waste and Recycling Board's recent work on waste management in flatted developments.
- The use of Site Waste Management Plans, and standards such as CEEQUAL and BREEAM were advocated to provide delivery of the waste hierarchy.

#### **Question 6.12**

Should we continue to rely on waste management facilities outside the City? If so, how should we co-operate with other waste planning authorities to ensure adequate and appropriate planning for waste?

Number of comments: 9

- All respondents acknowledged that due to the unique nature of the City it will be necessary to continue to rely on waste management facilities elsewhere. A couple of respondents recommended that waste capacity in the City should, however, be assessed through an options appraisal.
- Five of the responses to this question came from waste planning authorities (either individually or as part of a group), who pointed out that waste capacity at recipient authorities is diminishing due to landfill closures. A number of respondents commented that the City should continue to co-operate with the London Waste Planning Forum, the GLA, the South East London Waste Planning Group, other boroughs and authorities elsewhere that receive waste from the City.
- The London Plan's aim for net self-sufficiency by 2026 was supported. However, construction waste is a particular issue as there is currently no agreed apportionment for where this should be managed.
- There was support for the use of Walbrook Wharf coupled with waste management facilities downstream to encourage sustainability and reduce road congestion.

#### **Question 6.13**

Should we continue to safeguard Walbrook Wharf as a waste site? Are there any other sites in the City which could be used for waste management, reducing the need to export waste elsewhere?

Number of comments: 15



- The majority of respondents (12) thought that Walbrook Wharf should continue to be safeguarded, noting its benefits for low emission waste transport.
- It was suggested that other waste-related uses, such as the transfer of construction, demolition and excavation waste, should be considered at Walbrook Wharf.
- The Port of London Authority highlighted that even if Walbrook Wharf were no longer used for the transport of waste by water, it would still be a safeguarded wharf.
- There was some support for the provision of waste treatment facilities, particularly for food waste, within commercial developments.

## Flood Risk

### Question 6.14

Should national SuDS standards continue to be applied to major development only or should we require smaller development to incorporate a certain standard of SuDS? If so, what type of smaller developments should be included?

Number of comments: 9

- Four respondents considered that SuDS standards should be applied to all scales of development. However, two respondents felt that SuDS standards should only be applied to major development, with the CPA pointing to viability and feasibility concerns.
- The GLA commented that the applications of SuDS to smaller scale development merits consideration and the Environment Agency highlighted that the policy should be informed by evidence from the City's Strategic Flood Risk Assessment.

### Question 6.15

Should we require flood resistance and resilience measures for new development and refurbishment schemes within the City Flood Risk Area? If so what measures should be specified?

Number of comments: 9

- All respondents were in favour of requiring flood resistance and resilience measures for premises in the City Flood Risk Area, with the GLA suggesting the approach to Flood Risk Management is forward looking and seeks to address the particular flood risk challenges in the City.
- Specific measures proposed included the use of non-porous materials at ground floor level and flood resilient doors and windows.
- Other respondents suggested adopting best practice measures at the time of the planning application, following national and regional guidance, using BREEAM, and identifying suitable measures through the Strategic Flood Risk Assessment.

## City Communities

## General comments

Number of comments: 1

- It was suggested that there should be more inclusion of surrounding boroughs in the Plan in order to better co-ordinate the needs of the City and ensure that these boroughs benefit from the economic success of the City.

## Open Spaces and Recreation

### Question 7.1

Should we continue to protect or enhance the existing open spaces in the City? How can we deliver more open space in the City?

Number of comments: 19

- This question produced a clear consensus, with all respondents agreeing that open spaces in the City should be protected, enhanced and expanded where possible. A number commented that open spaces and green areas are vital to achieving the Local Plan's strategic objectives.
- Five respondents felt that existing open spaces should be protected from overshadowing and encroachment of nearby developments.
- There were five comments suggesting there should be a requirement for public open space to be provided at ground level in large and tall building developments.
- Six respondents commented that, while sky gardens can provide amenity for office workers, they are no substitute for public open space at ground level.
- The City of London Archaeological Trust highlighted that open spaces have a history which should be made evident in the space itself, adding that historic spaces must be valued because they are historic and serve as places of memory.
- The Chapter of St Paul's Cathedral commented that open spaces are important resources for seeking solace and calm, places for reflection as well as active learning and can support community cohesion, if managed well.
- The Barbican Association indicated that roof top terraces should not be built on office blocks adjacent to the Barbican or Golden Lane estates, but where such terraces are built their usage should be limited to 8am to 7pm.
- The Museum of London commented that there are opportunities to enhance some of the open spaces around West Smithfield as part of the plans for a new museum.

### Question 7.2

Should priority be given to greenery within open spaces or to harder surfaces that are easier to maintain? Should developers be required to contribute towards the future maintenance of new open spaces?

Number of comments: 15

- The majority of respondents (10) expressed a preference for greenery to be given priority in open spaces. Several respondents felt that even the smallest public realm proposals should include some form of planting. Reasons for preferring greenery included relaxation, mitigating the impacts of pollution and climate change, and assisting biodiversity.
- Four respondents felt that a mixture of hard and soft landscaping should be provided, depending on the circumstances of each site.
- Six respondents suggested that developers should be required to maintain public open spaces within their site boundaries.

### **Question 7.3**

Should we require buildings over a certain size to contain a proportion of public space and/or employee recreational space within the building, including roof space?

Number of comments: 16

- The majority of respondents (11) supported the provision of public space and/or employee recreational space within buildings. However, several respondents emphasised that employee recreational space within buildings should not be a substitute for public open space at ground level.
- The CPA expressed concerns about a one size fits all policy on this topic and does not believe it is appropriate to provide public space or viewing galleries in all major developments or tall buildings. A policy which leads to a proliferation of viewing galleries is not considered sustainable, or necessarily in the best interests of the City.
- The Barbican Association reiterated concerns about roof terraces close to residential clusters and suggested that developers be encouraged to make imaginative use of internal atriums, for example to include climbing walls.

### **Question 7.4**

What type of outdoor open spaces and recreation facilities are most needed in the City? Should we specify what should be sought in new open spaces in terms of seating, planting and other facilities, depending on their location and character?

Number of comments: 14

- All respondents suggested what they would like to see in open spaces, but there were few comments on whether the Local Plan should specify types of facilities in particular locations. Amongst the suggestions were: seating (in sunlight); eating areas; rain shelters; easy access to toilets and catering facilities; lighting; trees; wildlife and water features.
- The Barbican Association suggested that where there is space in a large development, away from residential clusters, the hard landscaping should include sports facilities.

- The CPA commented that factors will vary between sites and did not wish to see a prescriptive policy on this topic, whilst supporting the ambition of the policy sentiment.
- The Chapter of St Paul's Cathedral commented that modest commercial use of open spaces, if well-judged and managed, could provide a public benefit and is an issue worthy of consideration.

## Retailing

### Question 7.5

Should the number or role of PSCs be modified and/or should the boundaries of existing PSCs be amended? Is it still an appropriate policy objective to prioritise A1 units over other retail uses in PSCs?

Number of comments: 10

- Respondents to the first part of this question supported the retention of the PSCs, although three mentioned the need to review current PSC boundaries.
- The Museum of London suggested there may be a case in the future for a new PSC in the Farringdon area to reflect the potential change in character resulting from Crossrail and development activity in this area.
- There was a mix of views regarding prioritising A1 (shop) units in PSCs. Four respondents supported prioritising A1 units, or at least setting a baseline level of A1, although the CPA qualified this with the comment that policy should not be too prescriptive.
- The Barbican Association suggested that permissions for A3 uses (restaurants and cafes) in or opposite the Barbican Residential Estate should be conditioned to prevent an A5 (hot food takeaway) element in order to avoid nuisance from delivery services.

### Question 7.6

Do the retail links still serve a clear purpose, or should we allow retail uses throughout the City? Should isolated retail units continue to be protected?

Number of comments: 10

- There were mixed views in relation to this question. Three respondents felt that the retail links still serve a clear purpose. On the other hand, three respondents were in favour of allowing retail uses throughout the City, unless there is a particularly strong reason not to allow it.
- Tower Hamlets suggested a new retail link north of the Liverpool Street PSC to promote movement between there and Spitalfields Market.
- Two respondents supported continued policy protection of isolated retail units, while two were opposed to this.

## Housing

### Question 7.7

Should we define the boundaries of existing residential areas more clearly to indicate where in the City further residential development would be permitted? Or, should residential development be permitted anywhere in the City as long as the particular site is not considered suitable for office use and residential amenity consistent with a city centre location can be achieved?

Number of comments: 19

- The majority of respondents (12) supported residential development being permitted anywhere in the City providing the site is not suitable for office use and a reasonable standard of residential amenity can be achieved.
- It was argued by some of those who supported a dispersed approach that policies should be flexible and the potential for residential use should be considered on a site-by-site basis. Others stated that residential development can co-exist with offices and that there are good examples of this in the City.
- Five respondents, including the GLA and the CPA, favoured a continuation of the current policy approach of focusing new housing in existing residential areas.
- Four respondents felt that residential boundaries should be defined or made clearer in the Plan, while three respondents were opposed to defining specific boundaries.
- The Chancery Lane Association stated that it would object to defined boundaries if the Chancery Lane area were not included within a residential area.

### Question 7.8

Should we plan to meet the London Plan housing target, or the level of need identified in the Strategic Housing Market Assessment? Is there a need to exceed the London Plan housing target to address wider London housing need?

Number of comments: 12

- The majority of respondents (9) considered that the City should at least meet the housing target in the London Plan. Of these, 5 expressed support for potentially exceeding the London Plan target and 4 referred simply to meeting the target.
- Two respondents felt that either no additional housing or the absolute minimum should be provided within the City's boundaries.
- The GLA and TfL both stated that the City should meet its London Plan housing target but added this will need to be managed in ways which do not compromise the City's strategic CAZ roles.
- The Barbican Association called for measures to prevent residential units being bought by overseas investors and never occupied.

### Question 7.9



Is it feasible in the City for residential units to be successfully incorporated in a building with non-residential uses? Or would co-existence undermine the operation of City businesses and/or residential amenity?

Number of comments: 16

- The majority of respondents (11) stated that it is feasible for residential units to be successfully incorporated in buildings alongside non-residential uses.
- Some respondents felt that mixed-use developments should be encouraged because they would bring wider benefits, such as allowing for interesting design solutions or assisting with placemaking.
- A number of respondents, while supporting co-location of uses from a design point of view, did not specifically state whether or not this would be desirable in the City.
- Four respondents were opposed to mixing residential and non-residential uses in the same building, either because this would impact on the flexibility required to respond to changing business needs or because it would result in a loss of residential amenity.

#### **Question 7.10**

Are there types of housing to suit specific needs that we should encourage in the City e.g., sheltered housing for the elderly or new forms of rental accommodation?

Number of comments: 5

- All respondents felt there is a need for specific types of housing in the City, albeit they had different views on what that should comprise. Suggestions included rent to buy housing; short-stay accommodation with weekly or monthly rentals; hostels; student-type accommodation with flexible tenancies; key worker accommodation; and sheltered housing for the elderly.
- While three respondents supported the provision of short-stay accommodation, the Barbican Association felt that hostels, student accommodation and short term lets should be discouraged within or close to residential clusters due to their impact on amenity.

#### **Question 7.11**

Should the level of affordable housing required in the City be increased to allow the supply of rented affordable housing to be retained alongside starter homes? Is the approach to seeking commuted sums and delivering affordable housing acceptable?

Number of comments: 9

- This question prompted divergent views, with four respondents supporting an increase in the level of affordable housing within the City and four against.
- Amongst those who supported an increase, two respondents commented that starter homes alone would not adequately address housing needs and that an increased target would enable other affordable housing tenures to be provided.

- Those who did not support an increase felt that provision of affordable housing is more appropriate elsewhere in London where there is less competition from commercial users.
- Four respondents supported the City's current approach to collecting commuted sums and using these to deliver affordable housing outside the Square Mile.
- The Barbican Association suggested that the new housing should be within 2 km of the City's boundaries to make it easier for lower paid City workers and key workers.
- On the other hand, two respondents favoured on-site affordable housing provision.

#### **Question 7.12**

Are there any areas of land in the City that should be considered suitable for 'permission in principle' for housing-led development through the Local Plan review?

Number of comments: 5

- Three respondents considered there were no suitable areas in the City for 'permission in principle' housing development.
- A landowner put forward a site in Lower Thames Street as suitable for residential development as part of a mixed-use scheme that includes offices and retail. Another respondent suggested the St. Paul's and Smithfield areas would be suitable.

## Social and Community Infrastructure

### Question 7.13

What type of facilities and services would be appropriate to meet the needs of current and future City workers? Are these different to the facilities needed by residents? How can facilities for workers and residents be best delivered?

Number of comments: 4

- The Barbican Association highlighted that City workers can register at City GP practices, yet there is only one NHS doctors' surgery within the City. It advocated securing space for additional surgeries within large redevelopment schemes with the aim of achieving an NHS surgery in each of the four quarters of the City.
- The CPA considered that current policies are appropriate to achieve a diverse range of facilities and services to meet current and future City office needs.
- The Campaign for Real Ale (CAMRA) felt that the development of traditional pubs for alternative, more profitable uses is a major threat to the future vibrancy and vitality of the City. It called for a specific policy to protect pubs in line with the broad requirements of the NPPF and the London Plan.

### Question 7.14

Should we plan to meet the need for social and community services in full within the City, or work with partners in neighbouring boroughs?

Number of comments: 6

- Two respondents felt the City Corporation should work with neighbouring boroughs to provide social and community facilities. Given the unique nature of the City, the GLA indicated it is acceptable to consider shared provision with adjoining boroughs, although there may be demand for certain types of daytime services for the working population.
- Two respondents considered that services and facilities should be located within the City. The CPA noted that social and community services are hugely important to the functioning of a sustainable City, while the Barbican Association felt that the necessary physical infrastructure and buildings should be within the City.

### Appendix 3 – Issues and Options Public Events Responses Summary

Topic	Comments from 1 <sup>st</sup> consultation event 03/10/16
<b>Offices/SMEs</b>	How will the plan address those SMEs that wish to remain small and not expand?
<b>Offices/SMEs</b>	City needs more creative industries and not 'for profit' organisations.
<b>Offices/SMEs</b>	Corporation needs to engage with SME's and residents.
<b>Offices/SMEs</b>	The City has character, but this is being threatened by large buildings. Given Brexit, large floor space buildings may become less attractive.
<b>Offices/SMEs</b>	The cost of the City's office space is a pertinent issue. Policies need to be robust to avoid being overridden by high rents.
<b>Offices/SMEs</b>	Since the 1980's office rents have not increased.
<b>Offices/SMEs</b>	Interesting to see how City treats its own development sites. Eastern Cluster integration with area over the boundary. Contrast between one of the wealthiest Local Authorities and most deprived.
<b>Offices/SMEs</b>	Large floor plate buildings should be designed to be flexible so they can accommodate small business space as well.
<b>Tall Buildings</b>	Important that tall buildings are grouped to avoid a messy look to the skyline.
<b>Tall Buildings</b>	Retaining tall building constraints indicates that the City is actively planning the skyline.
<b>Tall Buildings</b>	As land is so valuable, developers are maximising profits by building taller. City must combat short-term wins.
<b>Development (general)</b>	Pushes activities outside City because of the concentration inside the City e.g. South Bank – easier to accommodate different uses.
<b>Development (general)</b>	Designs of buildings and support services are not keeping up with requirements.
<b>Development (general)</b>	Different types of property, including offices and residential should not be mixed.
<b>Environment</b>	Pollution levels in the City are too high. Key cause of poor air quality is traffic and construction activity.
<b>Environment</b>	City should be a little Singapore. Green space on top of buildings excuses other initiatives, shouldn't be let off the hook.
<b>Environment</b>	There are conflicts within the Corporation; green issues are not given enough importance.
<b>Environment</b>	Contradiction in permitting residential development along Thames Street given high levels of pollution.
<b>Environment</b>	The Circular Economy is not given sufficient priority in the planning process. Policy and Resources Committee

	does not give enough priority to refurbishment and saving resources. Need references throughout the Plan.
<b>Environment</b>	The Sustainable City Forum should be prioritised and allowed to have influence.
<b>Servicing and Deliveries</b>	Need to ensure that deliveries are still able to service the centre of the City.
<b>Parking</b>	There is no reference to disabled residents. On-street spaces should be provided for disabled residents. Blue Badge provision doesn't reserve spaces for residents. In Westminster there is allocated parking for disabled residents. There is a problem with disabled parking in residential conversions not being maintained for people with disabilities.
<b>Residential amenity</b>	Residents living in Andrews House facing Fore Street suffer constant disturbance from coaches in bays, taxis and drivers. Traffic laws are not being enforced. Would be useful to close Fore Street to traffic.
<b>Residential amenity</b>	Development of new buildings needs to consider disturbance to residents.
<b>Residential amenity</b>	What is the City's future view on rights to light?
<b>Residential amenity</b>	Residential amenity is a big problem for residents. Residents suffer from noise and bars and restaurants with late licenses. People and their noise are not managed as they leave the premises.
<b>Public Realm</b>	The City has the potential to be characterful and a great place to walk around. However, the City is a grim place to walk around due to the degree of development.
<b>Public Realm</b>	More greenery in the Barbican needed.
<b>Public Realm</b>	Street cleaning does not keep pace with increasing visitor numbers, particularly at weekends, when there are more visitors and construction workers.
<b>Public Realm</b>	Need a beautiful entrance to the new museum and the Barbican. Roads should have creative art and design shops; good examples - Landmark Trust building and Geranium.
<b>Polycymaking/ implementation</b>	Will this consultation exercise sincerely seek to address issues raised?
<b>Polycymaking/ implementation</b>	Is there someone with an arts background in DBE?
<b>Polycymaking/ implementation</b>	Difficult to get planning conditions honoured and enforced.
<b>Polycymaking/ implementation</b>	Need to make sure that policy in the Plan transpires into reality and is able to mitigate noise and disturbance. There is too much appeasement by elected representatives. Members make decisions but barely read the relevant reports.

<b>Policymaking/implementation</b>	Corporation should be stricter in enforcing policies and regulations e.g., views affected by the Garden Bridge and peanut seller carts.
<b>Policymaking/implementation</b>	Corporation gives too much leeway to developers on key issues
<b>Transport</b>	What is the Corporation's vision for transport in 20 years' time? What level of electrification is anticipated? Drones may replace deliveries by van.
<b>Transport</b>	Need more cycle lanes and a reduction in vehicular traffic.
<b>City Fringe</b>	Relationship between City Fringe/Canary Wharf/London Plan is important. City Corporation must work with its neighbours.
<b>City Fringe</b>	Shoreditch becoming too expensive. SMEs moving into City as rents in Shoreditch area increase.
<b>City Fringe</b>	Tech City has passed the City by.
<b>City Fringe</b>	Norton Folgate is prime commercial property which, if in Mayfair, would command very high rent. City is dislodging this type of floor space.
<b>Puddle Dock</b>	Puddle Dock area needs redevelopment.
<b>Puddle Dock</b>	Need for strategic impetus and direction for Puddle Dock. What is happening at White Lion Hill? Any plans for progress?
<b>Night-time Economy</b>	To what extent is CoL prepared to enforce its policies? Need more stringent enforcing of breaches of night-time economy conditions, protection of public realm.
<b>Emissions</b>	More information is needed on the Low Emission Neighbourhood, how it will operate and how it will be enforced.
<b>Waste</b>	Need to minimise waste and how it is transported. Demolition and construction waste from Queensbridge House should have been moved by the river.
<b>Waste</b>	Should try and refurbish rather than demolish buildings. Need laws to regulate waste, similar to the Clean Air Act laws.
<b>Housing</b>	Housing target should be increased. Housing target should be broken down by tenure and target formulation should be more transparent.
<b>Housing</b>	Affordable and specialist housing should not be moved out to other boroughs.
<b>Views</b>	Views should be protected.
<b>Hotels</b>	Need more hotels.

## Health and Wellbeing comments

The Joint Strategic Needs Assessment team had a separate display table at our consultation event. They asked consultees to indicate what they felt were



the key health issues facing the City. People were asked to indicate whether they were residents, workers or other as below.

Residents	Workers	Other
<ul style="list-style-type: none"> <li>• Loss of daylight</li> <li>• Traffic-speed control needed</li> <li>• Cycle Superhighway</li> <li>• Road traffic - too many buses and taxis</li> <li>• Air pollution</li> <li>• Lack of green space</li> <li>• Noise pollution - too much construction</li> <li>• Illegal building work</li> <li>• Noise outside quiet hours</li> <li>• Rubbish collection</li> <li>• Street cleaning</li> <li>• Black carbon</li> <li>• Idling lorries and diesel generators</li> </ul>	<ul style="list-style-type: none"> <li>• Need for more sports facilities</li> <li>• Protection of cyclists and motorcyclists</li> <li>• Space to relax more - open spaces</li> <li>• Support for mental health issues</li> <li>• Noise pollution</li> <li>• Lack of public realm</li> <li>• Air pollution</li> </ul>	<ul style="list-style-type: none"> <li>• Air pollution</li> <li>• Fog</li> </ul>

Topic	Comments from 2nd consultation event 13/10/16
<b>Retail</b>	Allow more retail in quieter places as long as there is enough footfall
<b>Economy</b>	How will Brexit impact be planning the City?
<b>Tall Buildings</b>	Build taller than Dubai
<b>Servicing and deliveries</b>	Favours the use of consolidation centres
<b>Servicing and deliveries</b>	Encourage more catering facilities within buildings
<b>Servicing and deliveries</b>	Timed deliveries to avoid the rush hour
<b>Development (general)</b>	How can we find new uses for old buildings?
<b>Environment</b>	There should be a co-ordinated scheme for flood defence raising across London, with a London wide levy to pay for this
<b>Amenity</b>	Concerns around noise from flats let through Air bnb. Could CoL adopt a similar approach to Berlin?
<b>Amenity</b>	Concerns about loss of natural light and sunshine as a result of development

<b>Public Realm</b>	The trees in front of the Cheesegrater are not looking very good – how can we improve the public realm around there?
<b>Public Realm</b>	Tables in open spaces
<b>Public Realm</b>	How can you improve the public realm and rubbish? Particularly around lunchtimes.
<b>Policymaking/ process</b>	Too many people involved!
<b>Transport</b>	How can new technology be used to help remedy traffic congestion?
<b>Transport</b>	Electric vehicles should be encouraged
<b>Transport</b>	Communal cycle storage in buildings reduces cycle theft
<b>Fleet Street</b>	Fleet Street should be more pedestrian friendly
<b>Smithfield</b>	Is Smithfield Market going to stay in the same place? The traffic around the market is very bad.
<b>Cultural Hub</b>	What about the Cultural Hub?
<b>Night-time Economy</b>	Issues with licensed premises and the night-time economy. Is there an upper limit for licenses in the City?
<b>Night-time Economy</b>	Private functions at licensed premises at the weekend are an issue – hard to track and manage these.
<b>Night-time Economy</b>	How can you accommodate late and/or early workers in the City?
<b>Emissions</b>	No emission tax
<b>Smart City</b>	Free Wi-Fi should be available everywhere including the Tube
<b>Smart City</b>	City should be a CISCO style smart city
<b>Smart City</b>	Workspace in parks
<b>Waste</b>	Should encourage on-site waste management in large developments, but may not be popular with developers
<b>Waste</b>	Public management of waste collection rather than relying on private contractors
<b>Security</b>	Should have more attractive anti vehicle measures – not just bollards
<b>Security</b>	Are there any technological advances to improve security around the Eastern Cluster?
<b>Security</b>	ATTRO has decreased traffic around St Mary Axe
<b>Housing</b>	No more residential development
<b>Hotels</b>	Aldgate area should be extended to include existing hotel cluster at Tower.
<b>Hotels</b>	How can you stop hotels being turned into offices for big businesses/banks?
<b>Hotels</b>	Shortage of hotels in central part of the City
<b>Conference Centre</b>	Lack of large conference centre in the City

## Low Emission Neighbourhood Launch event 11/01/17

At the Local Plan stand we posed 2 questions from the Issues and Options consultation document:

### Question 6.3

Should we identify and encourage specific local measures to improve air and water quality, conserve water and minimise flood risk, minimise noise and light pollution and eliminate potential land contamination. If so, what should they include?

### Question 6.7

How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

The following post-it note comments were received:

Topic	Comment
<b>Electric vehicles</b>	Promote electric charging points in car parks – especially in the Barbican
<b>Electric vehicles</b>	Promote electric vehicles as long as residents without electric vehicles can still access car parks
<b>Electric vehicles</b>	Electric police and emergency service vehicles
<b>Electric vehicles</b>	Encourage charging points for electric vehicles
<b>Electric vehicles</b>	Incentivise electric vehicles
<b>Electric vehicles</b>	Support electric vehicle only taxi rank at Lauderdale Tower
<b>Beech Street</b>	Close Beech Street Tunnel to <u>all</u> traffic immediately
<b>Beech Street</b>	Improve air quality in Beech Street Tunnel
<b>Beech Street</b>	Close Beech Street Tunnel
<b>Beech Street</b>	Consider the knock-on impacts of rerouting Beech Street to other neighbouring streets
<b>Beech Street</b>	How would we enforce ban on non-electric vehicles in Beech Street?
<b>Parking</b>	Stop all car parking. Provide cycle parking at all public venues especially Barbican
<b>Parking</b>	Reduce motorcycle parking to reduce noise levels
<b>Parking</b>	Link CO2 emissions to parking costs
<b>Vehicle emissions</b>	Fine all idling vehicles – including police
<b>Vehicle emissions</b>	Remove diesel vehicles from <u>all</u> London Streets

<b>Emissions from buildings</b>	Reduce pollution associated with emergency diesel generators
<b>Emissions from buildings</b>	Emissions from buildings de-coking on Saturday morning are noticeable – vapour/mist
<b>Emissions from buildings</b>	Do not allow or especially not incentivise the use of diesel generators by City businesses
<b>Building sites</b>	Stop building altogether – Air pollution from building sites kills people. Compare this with action to prevent exposure to smoking.
<b>Building sites</b>	Reduce dust from building sites
<b>Building sites</b>	Air Quality Management Plans should be submitted with planning applications
<b>Deliveries and servicing</b>	Provide space in buildings for deliveries to avoid queuing in the street
<b>Deliveries and servicing</b>	Promote consolidation of deliveries
<b>Deliveries and servicing</b>	Light pollution is a concern – loading bays as well as buildings
<b>Greening and environment</b>	Improved planting and greening would have air quality benefits
<b>Greening and environment</b>	Green barriers to reduce particulates
<b>Greening and environment</b>	Make clean air walking routes more visible
<b>Greening and environment</b>	Create more play streets
<b>Greening and environment</b>	Water collection from Podium waterproofing project – extension of Beech Gardens
<b>Beyond the City</b>	Extend air quality initiatives beyond the City boundary
<b>Beyond the City</b>	Initiatives in the City must not have negative impact elsewhere

## Appendix 4 – list of respondents to the draft City Plan 2036 Consultation

### Contact Name

1. Respondent	2. London School of Economics and Political Science
3. City of London Archaeological Trust	4. Respondent
5. Respondent	6. Respondent
7. Respondent	8. Neighbourhood Planners London
9. Superfusion lab	10. Respondent
11. Respondent	12. Respondent
13. Respondent	14. Respondent
15. Respondent	16. Dr Johnson's House
17. Respondent	18. Respondent
19. Respondent	20. Respondent
21. Respondent	22. Respondent
23. Respondent	24. Respondent
25. Respondent	26. Respondent
27. Respondent	28. Respondent
29. Respondent	30. The Aldgate Partnership
31. Respondent	32. Respondent
33. Respondent	34. Respondent
35. Respondent	36. Respondent
37. Respondent	38. Respondent
39. Respondent	40. Respondent
41. Respondent	42. Respondent
43. Respondent	44. Respondent
45. Respondent	46. Respondent
47. Respondent	48. Respondent
49. Respondent	50. Respondent
51. Respondent	52. Friends of City Gardens
53. London Silver Vaults	54. Respondent
55. Respondent	56. Respondent
57. Respondent	58. Respondent
59. Respondent	60. Respondent
61. Respondent	62. Respondent
63. Respondent	64. Respondent
65. Respondent	66. Respondent
67. Respondent	68. Respondent
69. Highways England	70. Respondent
71. Unblock the Embankment	72. Respondent
73. Respondent	74. Barbican Wildlife Group

75. Theatres Trust	76. Cathedrals Fabric Commission for England
77. Museum of London	78. Culture Mile
79. Merchant Land	80. Surveyor to the Fabric of St Paul's Cathedral
81. Historic England	82. Landsec
83. London Borough of Islington	84. GMS Estates and MacTaggart Third Fund
85. Federation of Small Businesses	86. Mayor of London
87. Respondent	88. CPRE London
89. Surrey County Council	90. The C4ty - City of London Youth Forum
91. Transport for London - Spatial Planning	92. Swift Conservation
93. Islington Swifts	94. Respondent
95. The Freight Traffic Control 2050 project team	96. Barbican Association
97. Core Connections	98. Northern & Shell
99. BlowUP Media	100. London Sephardi Trust
101. Trenitalia c2c Ltd	102. Healthwatch City of London
103. Historic Royal Palaces	104. Endurance Land
105. Environment Agency	106. London Borough of Tower Hamlets
107. Hackney Swifts	108. Respondent
109. Port of London Authority	110. Shakespeare Tower House Group
111. Smithfield Tenants Market Association	112. City Property Association (CPA)
113. City Property Association NextGen Steering Group	114. Unite Students
115. City Rivergate Ltd	116. Tenacity
117. Respondent	118. LaSalle Investment Management
119. British Land Company PLC	120. Diocese of London
121. Farebrother	122. Transport for London Commercial Development
123. Respondent	124. Respondent
125. Respondent	126. Little Britain resident
127. Respondent	128. Respondent
129. Respondent	130. Respondent
131. Respondent	132. Respondent
133. Respondent	134. Respondent
135. Respondent	136. Respondent



137. Respondent	138. Respondent
139. Respondent	140. Respondent
141. Respondent	142. Respondent
143. Respondent	144. Respondent
145. Respondent	146. City of London Access Group
147. Respondent	148. Respondent
149. Respondent	150. Living Streets
151. Freight Transport Association	152. Respondent
153. University of Liverpool in London	154. London Borough of Hackney
155. Respondent	156. Respondent
157. Respondent	158. Respondent
159. Respondent	160. Respondent
161. Respondent	162. Respondent
163. Respondent	164. Respondent
165. Respondent	166. London Taxi
167. Respondent	168. Respondent
169. Respondent	170. Respondent
171. Respondent	172. Respondent
173. Respondent	174. Respondent
175. Respondent	176. Natural England
177. Respondent	178. Respondent
179. Respondent	180. Respondent
181. Respondent	

## Appendix 5 – Draft City Plan 2036 Consultation Responses

Appendix 5 attached as a separate document.

## Appendix 6 – Proposed Submission City Plan 2036 Responses

Appendix 6 attached as a separate document.

## Appendix 7 –Representations received from Bevis Marks Synagogue, January 2024

Appendix 7 attached as a separate document.

## Appendix 8 Evidence of publicity of the City Plan under Regulation 20

### PART A- Email example/s

**Date:** 18 April 2024 09:52:00  
**Attachments:** [image001.gif](#)  
[image002.png](#)  
[image003.png](#)  
[Statement-of-Representations-Procedure-City-Plan-2040.pdf](#)  
[Model\\_Representation\\_Form\\_for\\_City\\_Plan\\_2040.odt](#)

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**Proposed Submission Draft City Plan 2040  
Notification of Public Consultation  
Planning & Compulsory Purchase Act 2004  
Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England)  
Regulations 2012**

We are contacting you as someone who has previously registered with us as being interested in the preparation of the City of London Local Plan (City Plan 2040). We write to formally inform you of the publication of the Regulation 19 City Plan 2040 and consultation under Regulation 20 of the above acts.

The Proposed Submission Draft City Plan 2040 was approved by the Court of Common Council on 7 March 2024 and is now being published for Regulation 19 consultation. The consultation will begin on **Thursday 18 April and run until 11pm on Friday 31 May 2024.**

The Plan and the proposed submission documents are available for inspection at the following link [City Plan 2040 - City of London](#) and in the locations set out below.

Location	Opening times
The Guildhall, North Wing Reception, London, E2P 2EJ	Mon- Fri: 08.00am - 6.00pm
Guildhall Library, Aldermanbury, EC2V 7HH	Mon- Sat: 9.30am-5.00pm
Shoe Lane Library, EC4A 3JR	Mon, Wed-Fri: 9.30am-5.30pm Tue: 9.30am-6.30pm
Barbican Library, EC2Y 8DS	Mon, Weds, Fri: 9:30am - 5:30pm Tue, Thurs: 9:30am - 7:30pm Sat: 9:30 - 4:00pm
Artizan Street Library and Community Centre, E1 7AF	Mon: 8am - 7pm Tues-Fri: 8am - 5.30pm
Barbican Estate Office, EC2Y 8EN	Mon-Fri: 8:30am – 1.00pm, 2.00-5.00pm
Golden Lane Estate Office, EC1Y 0SJ	Mon- Fri: 8am - 4pm
Middlesex Street Estate Office, E1 7AF	Mon - Fri: 8am - 4pm

The above web link and document attached contains the relevant privacy notice- please ensure you read this carefully. Further details are also available online. within the attached and at the locations above on how to respond to the consultation.

Please see **attached** to this email a copy of the [Statement of Representations Procedure](#) and [Consultation Response form](#).

The City Plan proposed Submission Documents are:

- City Plan 2040
- Policies Map and proposed changes
- Integrated Impact Assessment (IIA) including Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment



Habitats Regulation Assessment (HRA)

- Consultation Statement

The City Plan evidence base is also available at the following link: [Evidence: Draft City Plan 2040 - City of London](#)

For further information on the next stages in plan-preparation, please also see the City Plan link above.

Planning Policy Team,  
Environment Department,  
City of London

Email enquires only: [localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk)

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**From:** Planning Policy Consultations  
**Sent:** Wednesday, May 29, 2024 2:22 PM  
**Subject:** City Plan 2040 - Update

Dear stakeholder,

The Proposed Submission Draft City Plan 2040 was approved by the Court of Common Council on 7 March 2024 and is now currently out for Regulation 19 consultation. Following a request from a number of stakeholders to extend the consultation, it has been decided to move the deadline, from Friday 31 May to **Monday 17 June**. The two-week extension is in the interest of fairness and will ensure that every voice [has the opportunity to](#) be heard.

The Plan and the proposed submission documents are available here: [City Plan 2040 - City of London](#).

Have your say here: <https://cityplan2040.commonplace.is/>

Kind regards

Planning Policy Team,  
Environment Department,  
City of London

Email enquires only: [localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk)



## A- Website screenshot showing consultation

### Figure X – City Plan 2040 webpage

NRS Healthcare data breach

[Getting help with the cost of living](#)
[Contact the City Corporation](#)
[About us](#)
[Events](#)
[Accessibility statement](#)
[Councillors, committees and meetings](#)
[Report, Pay, Apply](#)

[Services](#) / 
 [Planning](#) / 
 [Planning policy](#) / 
 [City Plan 2040](#)

# City Plan 2040

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Date updated: 24/04/2024

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## What is the City Plan 2040?

City Plan 2040 is a plan for the development of the Square Mile, setting the City Corporation's priorities for development up to 2040, together with policies that will guide future decisions on planning applications. Once adopted, the new Plan will replace the [Local Plan 2015](#).

### Regulation 19 consultation: how can I respond?

The consultation is open until 31 May (11pm)

**City Plan 2040 PDF (10MB)**

Draft City Plan 2040

Date submitted: 23/01/24

#### Related links

- Evidence: Draft City Plan 2040
- Planning policy library
- Planning policy

**Respond to the consultation on Commonplace**

All representations must set out whether it is considered that the City Plan 2040 is sound, legally compliant and complies with the 'Duty to Cooperate'. The tests of soundness are set out in the National Planning Policy Framework (paragraph 35). As you set out your response, please consider these questions:

- Is City Plan 2040 legally compliant and sound?
- Are any modifications necessary to make City Plan 2040 legally compliant and sound? It will be helpful if you are able to put forward your suggested revised wording of any policy and text.
- If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**More information**

For further information, review the Statement of Representations Procedure

- If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

#### More Information

For further information, review the Statement of Representations Procedure and Model Representation Form PDFs.

#### Privacy Notice

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. Save as set out below, all other personal information will remain confidential and managed in line with the [City Corporation's privacy notice](#).

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice.

Environment Department privacy notice PDF (546KB)



Date submitted: 30/08/23

The City Corporation is unable to accept anonymous representations, or representations without a means of principal contact (eg email address or postal address).

A copy of all representations will be made available in full to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). In respect of the Planning Inspectorate (including any programme officer) this will include providing them with the contact details of persons who made representations so that they can contact participants and administer the examination. The [Planning Inspectorate's Privacy Notice](#) provides guidance on how your personal information will be processed by the Planning Inspectorate.

Please also note that when making a representation you will be able to request to be added to distribution list to manage the examination process and to be notified at a specified address of the following:

- The submission of City Plan 2040 for independent examination
- The publication of the recommendations of the person appointed to carry out the independent examination of City Plan 2040
- The adoption of City Plan 2040

Statement of Representations Procedure PDF (135KB)



Date submitted: 4/04/24


Model Representation Form DOCK (53KB)



Date submitted: 4/04/24

X



To view the interactive policies maps and see the evidence underpinning the City Plan visit our [StoryMaps](#) .



You can inspect physical copies of the City Plan 2040 and Policies Map, the Consultation Statement and the Statement of Representations Procedure at the following locations:

**The Guildhall North Wing Reception**  
Mon-Fri: 8am-6pm

**Guildhall Library**  
Mon- Sat: 9.30am-5.00pm

**Shoe Lane Library**  
Mon, Wed-Fri: 9.30am-5.30pm  
Tue: 9.30am-6.30pm

**Barbican Library**  
Mon, Weds, Fri: 9.30am-5.30pm  
Tue, Thurs: 9.30am - 7.30pm  
Sat: 9.30 - 4pm

**Arlitzan Street Library**  
Mon: 8am-7pm  
Tues-Fri: 8am-5.30pm

**Barbican Estate Office**  
Mon-Fri: 8.30am-1pm, 2-5pm

**Golden Lane Estate Office**  
Mon- Fri: 8am-4pm

**Middlesex Street Estate Office**  
Mon - Fri: 8am-4pm

Policies Maps City Plan 2040 PDF (6MB)



Date submitted: 23/01/24

City Plan 2040 Policies Maps Changes PDF (9MB)



Date submitted: 15/04/24

City Plan 2040 Consultation Statement 2023 PDF (2MB)



Date submitted: 20/11/23

Appendix 5 Draft City Plan 2036 consultation responses PDF (4MB)












Date submitted: 23/01/24

Consultation Statement Appendix 6 Consultation Responses (387KB)



Date submitted: 23/01/24

X	Appendix 7 Representations from Bevis Marks synagogue PDF (4MB)	
	Date submitted: 23/01/24	
	Sustainability Appraisal PDF (2MB)	
	Date submitted: 17/01/24	
	Sustainability appraisal appendix 1 other plans/programmes PDF (657KB)	
	Date submitted: 17/01/24	
	Sustainability appraisal appendix 2 baseline information PDF (5MB)	
	Date submitted: 17/01/24	
	Sustainability appraisal appendix 3 consultation responses PDF (464KB)	
	Date submitted: 17/01/24	
	Sustainability appraisal appendix 4 reasonable alternatives PDF (2MB)	
	Date submitted: 17/01/24	
	Sustainability appraisal appendix 5 PDF (3MB)	
	Date submitted: 17/01/24	
	ED-HIS2 City Plan 2040 Equality Impact Assessment 2023 PDF (2MB)	
	Date submitted: 15/12/23	
	Habitat regulations assessment PDF (4MB)	
	Date submitted: 15/01/24	

Evidence: Draft City Plan 2040

X

## City Plan 2040 preparatory stages

IN

2016

Consultation in 2016 on key issues and potential options for a new local plan.

IN

2018-19

Consultation during late 2018 and early 2019 on a draft City Plan 2036.

2021

Consultation in Spring 2021 on a proposed submission version of the City Plan 2036.

2022-23

Further evidence and revisions to the City Plan in 2022 and 2023, to address consultation responses and changing economic, social and environmental circumstances.

Informal public engagement in Summer 2023 on key issues and the Key Areas of Change.

### Next steps

Spring/Summer 2024

Consultation on Revised Proposed Submission Draft City Plan 2040

Autumn 2024

Submission to Secretary of State for examination by independent Planning Inspector

Winter 2024

Anticipated examination hearing sessions

Summer 2025

Anticipated adoption of the City Plan

### Proposed Submission Documents

The City Plan is supported by a comprehensive evidence base and assessments both on the Local Plan evidence webpage and in the Planning Policy Library.

Previous versions of the City Plan and supporting documents are available in the [Planning Policy Library](#).

### Questions?

If you have any questions or would like to sign up to the Local Plan database, email the [Local Plans team](#) or call 020 7606 3030.

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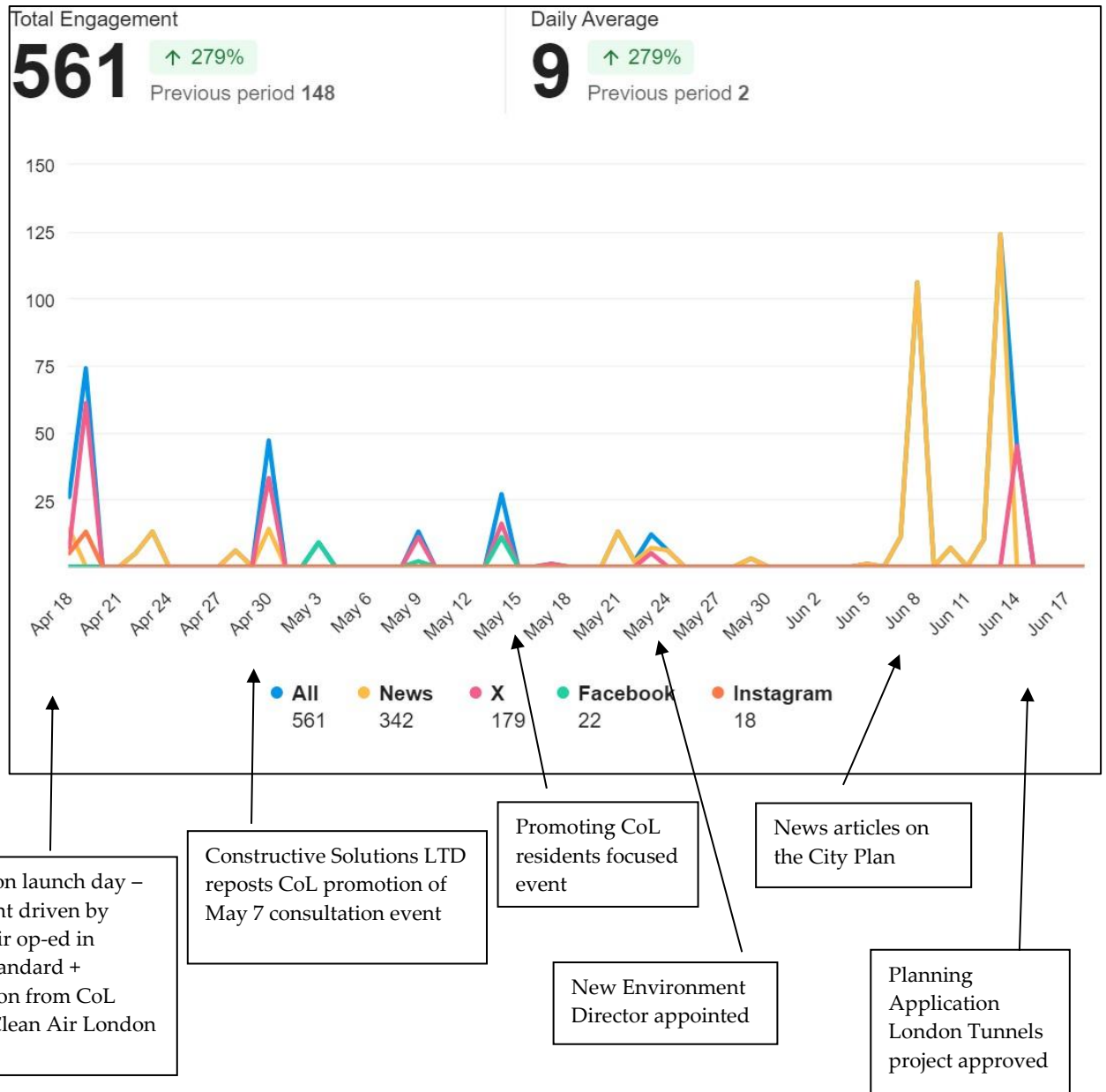
[eShot](#)

#### Safe spaces online

[Domestic abuse support](#)

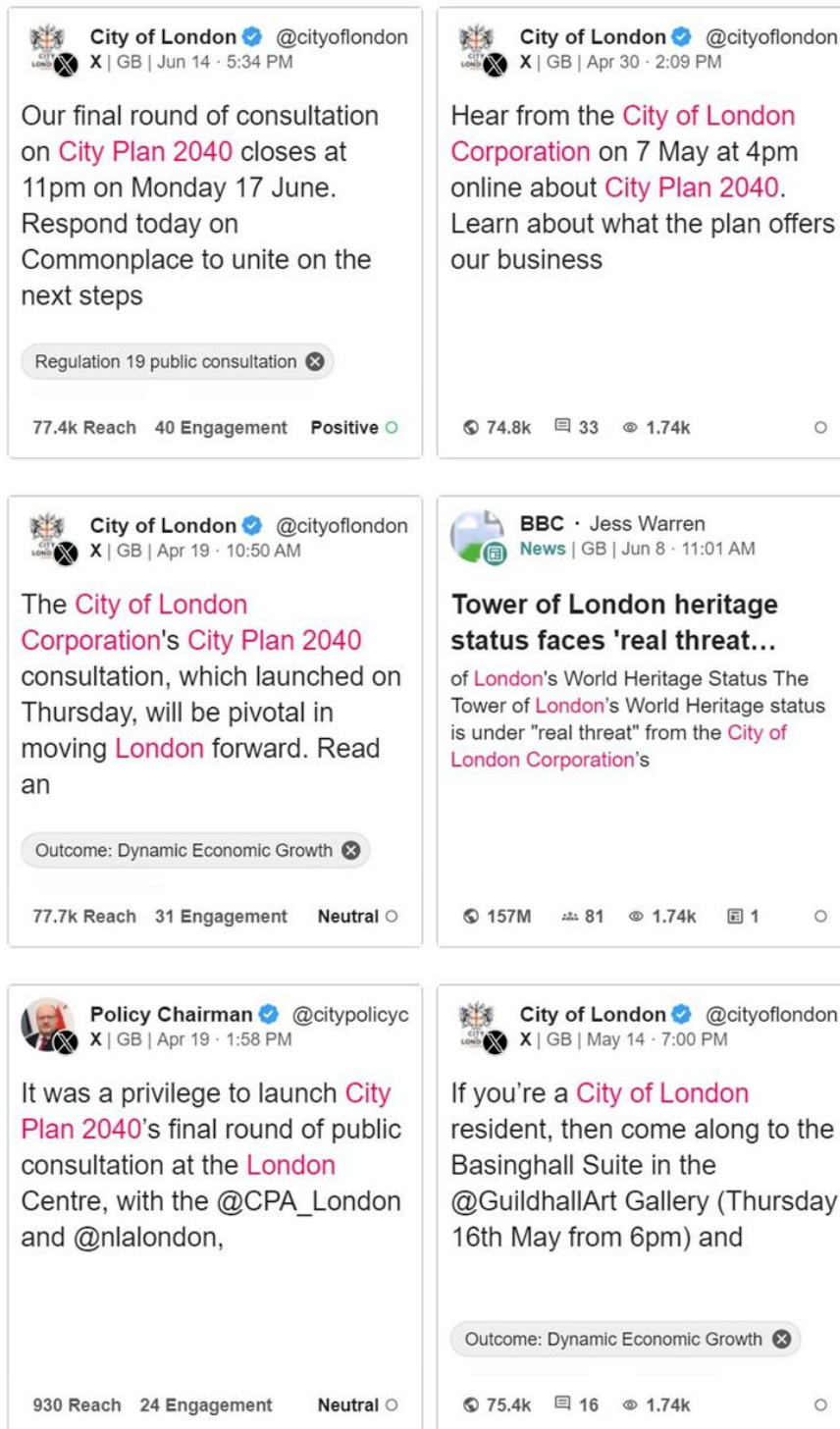
## Social media engagement highlights / key moments



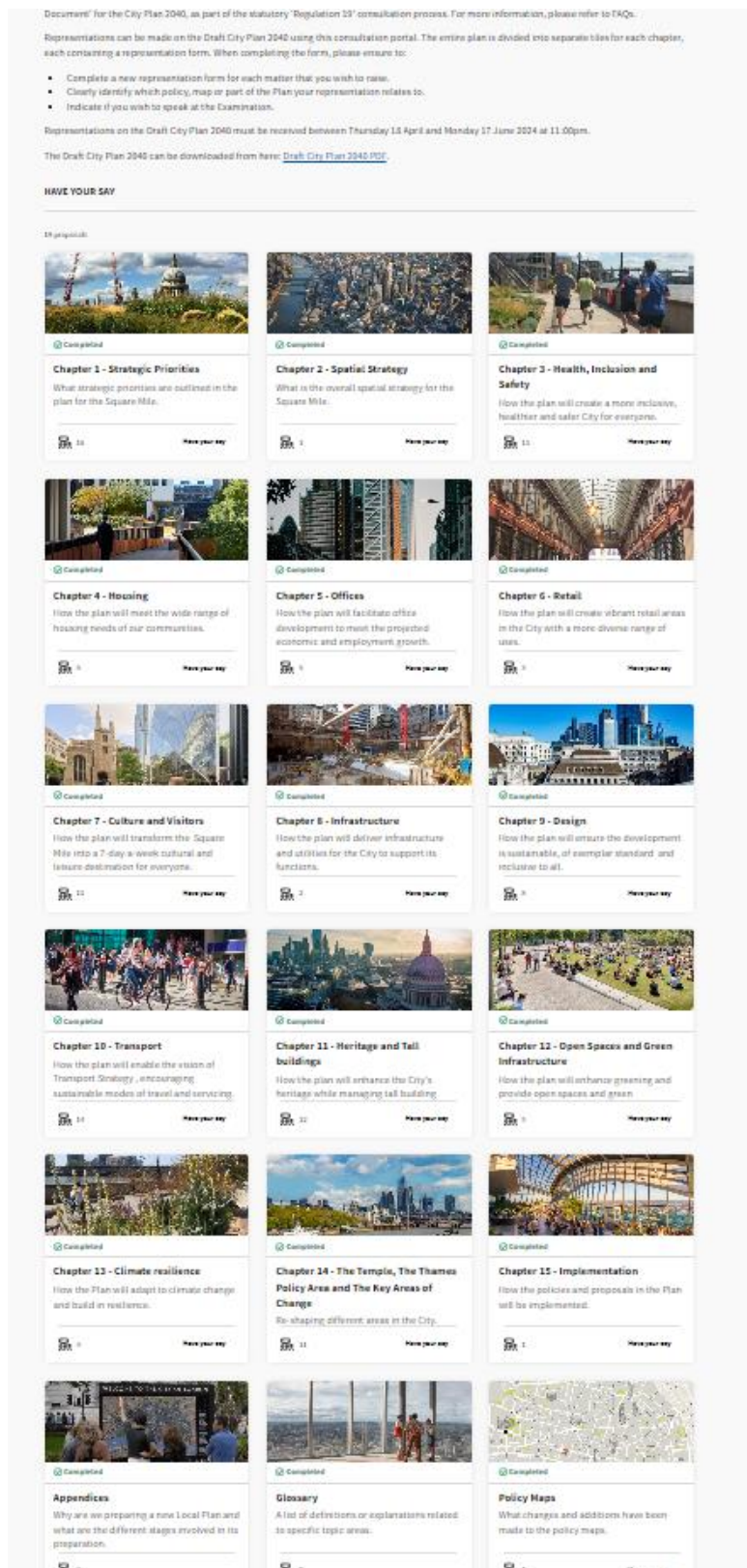




**Figure X – Most engaged social media content**



**Figure 1- Screenshot from consultation portal**



**Figure 2- Statement of Representations Procedure**



**Proposed Submission Draft City Plan 2040  
Statement of Representations Procedure and Notification of Public  
Consultation**

Planning & Compulsory Purchase Act 2004  
Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England)  
Regulations 2012

**1. Title of the Plan: City Plan 2040**

Notice is hereby given that the City of London Corporation has published and is inviting comments on its Regulation 19 Publication City Plan 2040 which it intends to submit to the Secretary of State for Levelling-up, Housing and Communities for independent examination.

**2. Subject Matter and the area covered by the Plan**

The City Plan 2040 will cover the whole administrative area of the City of London. The City Plan 2040 sets out the development strategy, vision, policies and proposals for planning in the City of London up to 2040 and beyond. It includes development management policies that will be used to guide decisions on planning applications.

The City Plan 2040 is accompanied by a Policies Map which shows the policy designations.

Upon its adoption, the City Plan 2040 will replace the adopted City of London Local Plan 2015.

The City Plan 2040 Proposed Submission Document takes account of responses from the Issues and Options (19 September to 2 December 2016), Regulation 18 public consultation (12 November 2018 to 28 February 2019), Proposed Submission Draft City Plan 2026 (19 March to 7 May 2021) and other informal engagement carried out in Summer 2023.

**3. Period for making representations**

Representations on City Plan 2040 must be received between **Thursday 18 April and 31 May 2024 at 11:00pm**. Only representations made before the close of the consultation will be taken into account in the examination process.

**4. How to make representations**

Representations should preferably be made within our consultation portal [[City Plan 2040 – Regulation 19 public consultation | Commonplace](#)].

Or alternatively by downloading the editable form from [City Plan 2040 - City of London](#) and emailing to: [planningpolicyconsultations@cityoflondon.gov.uk](mailto:planningpolicyconsultations@cityoflondon.gov.uk)





Post to: Development Plans Team, Environment Department, City of London Corporation, Guildhall, London, E2P 2EJ.

When making a representation you can express a preference for participation in the examination hearings.

## 5. Where to see the City Plan 2040

The City Plan 2040 and all supporting documents may be found on the City Corporation's website at: [City Plan 2040 - City of London](#)

You can inspect physical copies of the City Plan 2040 and Policies Map, the Consultation Statement and this Statement of Representations Procedure at the following locations:

Location	Opening times
The Guildhall North Wing Reception, London, E2P 2EJ	Mon- Fri: 08.00am - 6.00pm
Guildhall Library, Aldermanbury, EC2V 7HH	Mon- Sat: 9.30am-5.00pm
Shoe Lane Library	Mon, Wed-Fri: 9.30am-5.30pm Tue: 9.30am-6.30pm
Barbican Library, EC2Y 8DS	Mon, Weds, Fri: 9.30am - 5.30pm Tue, Thurs: 9.30am - 7.30pm Sat: 9.30 - 4.00pm
Artizan Street Library and Community Centre, E1 7AF	Mon: 8am - 7pm Tues-Fri: 8am - 5.30pm
Barbican Estate Office, EC2Y 8EN	Mon-Fri: 8.30am – 1.00pm, 2.00-5.00pm
Golden Lane Estate Office, EC1Y 0SJ	Mon- Fri: 8am - 4pm
Middlesex Street Estate Office, E1 7AF	Mon - Fri: 8am - 4pm

The City Plan 2040 is accompanied by an Integrated Impact Assessment (comprising the sustainability appraisal, health impact assessment and equalities impact assessment), and a Habitats Regulations Assessment screening which will also be made available at the above locations.

The full City Plan 2040 evidence base is available on the City Corporation's website: [City Plan 2040 - City of London](#).

## 6. Making your representation

The online and downloadable response form gives guidance on how to respond to the consultation, including options relating to being attendance at the examination in public and being kept informed of the next stages in the plan-preparation process.

All representations must set out whether it is considered that the City Plan 2040 is sound, legally compliant and complies with the 'Duty to Cooperate'.







## 7. Privacy Notice

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. Save as set out below, all other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](https://cityoflondon.gov.uk) and the City Corporation's privacy notice available at [www.cityoflondon.gov.uk/privacy](https://www.cityoflondon.gov.uk/privacy)


The City Corporation is unable to accept anonymous representations, or representations without a means of principal contact (e.g. email address or postal address).

A copy of all representations will be made available in full to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). In respect of the Planning Inspectorate (including any programme officer) this will include providing them with the contact details of persons who made representations so that they can contact participants and administer the examination. The Planning Inspectorate's Privacy Notice available at [Planning Inspectorate: privacy notices - GOV.UK \(www.gov.uk\)](https://www.gov.uk) provides guidance on how your personal information will be processed by the Planning Inspectorate.

Please also note that when making a representation you will be able to request to be added to distribution list to manage the examination process and to be notified at a specified address of the following:

- The submission of City Plan 2040 for independent examination
- The publication of the recommendations of the person appointed to carry out the independent examination of City Plan 2040
- The adoption of City Plan 2040

**Figure 3- Model Representation form**

Model Representation Form for Local Plans		
	<p><b>Local Plan</b> Publication Stage Representation Form</p>	<p><b>Ref: Reg 19</b>  (For official use only)</p>
<p><b>Name of the Local Plan to which this representation relates:</b></p>		<p>City Plan 2040</p>
<p><b>Please return to City of London Corporation BY 11:00PM 31 May 2024</b>          emailing to: <a href="mailto:planningpolicyconsultations@cityoflondon.gov.uk">planningpolicyconsultations@cityoflondon.gov.uk</a></p> <p>Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.</p> <p>For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at <a href="http://cityoflondon.gov.uk/Environment-Department-Privacy-Notice">Environment Department Privacy Notice (cityoflondon.gov.uk)</a> and the City Corporation's privacy notice available at <a href="http://www.cityoflondon.gov.uk/privacy">www.cityoflondon.gov.uk/privacy</a>. Please also see our Statement of Representations Procedure available at: <a href="#">City Plan 2040 - City of London</a>.</p>		
<hr/> <p>This form has two parts –          Part A – Personal Details: need only be completed once.          Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.</p> <hr/>		
<p><b>Part A</b></p>		
<p><b>1. Personal Details*</b>  <i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i></p>	<p><b>2. Agent's Details (if applicable)</b>  <i>(if applicable)</i></p>	
Title		
First Name		
Last Name		
Job Title (where relevant)		

Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.



(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☐

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.





3,045 visitors on the Commonplace website from 17 April to 18 June.

