

Sustainability Appraisal

Appendix 5: SA Assessments of the Revised Proposed Submission version of the City Plan 2040

Local Plan Review

Environmental Report

City Plan 2040 Revised Proposed Submission

January 2024



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Appendix 5 SA Assessments – Revised Proposed Submission City Plan 2040 policies

Assessments have been carried out on each of the policies in the City Plan 2040. The assessments identified areas where policies could be improved to align with the SA objectives.

Table 1: SA framework

	Impact of implementing policy	Response to SA assessment
↑	Significant positive effect	Consider whether further enhancement is possible
↑	Positive effect	Consider whether further enhancement is possible
↕	Uncertain effect	Consider policy wording changes and/or mitigation and monitoring
↑↓	Both positive and negative effect (minor rather than significant)	Consider policy wording changes and/or mitigation and monitoring
↓	Negative effect	Consider policy changes and/or mitigation
↓	Significant negative effect	Consider changing the policy
-	Negligible effect	

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London

↑↑↑	Three Arrows – national or international impact beyond London
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Comments are included to highlight the significant effects of the policy options in terms of direct or indirect effects, whether effects are permanent or temporary, and timescales. In the comments column the following applies in respect of timescale.

Short term	1-3 years
Medium term	3-10 years
Long term	More than 10 years

Spatial Strategy

Spatial Strategy

	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
Spatial Strategy	↑↑↑ (1, 3, 5, 6, 15)	↑ (4, 5, 7, 10, 11)	↕ (4)	↕ (3, 11, 12)	↕ (14)	↕ (13)	↑ (16)	↑ (8)	↑ (8, 9, 10)	↑ (6, 7, 8, 10, 14)	↑ (2)	↑ (5, 9, 10)	↕ (2, 13)	↑ (5, 12)	<p>1. The City, a global economic and office hub, will experience substantial office floorspace growth over the Plan period – particularly in the City Cluster Key Area of Change, supported by Fleet Street and Ludgate Key Area of Change, and Liverpool Street Key Area of Change.</p> <p>2. Additional housing will be focused in and around identified residential areas in the City and City fringe so as to protect commercial land uses, whilst student housing will be provided in suitable locations elsewhere to reduce student occupation of mainstream housing. This approach ensures tailored housing solutions to meet specific needs.</p> <p>3. Promotes retail development in the Principal Shopping Centres, some of which include historic markets and other heritage buildings (e.g. Leadenhall Market and Fleet Street). Retail contributes to the City's visitor economy and provides employment, in addition to enhancing the social, leisure and cultural offer of a place.</p> <p>4. Active frontages in all parts of the Square Mile will contribute to an attractive public realm and bring vibrancy to the City, which could increase footfall as well as feelings of safety. However, with more visitors coming to the area there may be potential issues regarding anti-social behaviour, crime and safety.</p>

	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
															<p>5. Identified cultural focal areas will align with the City's existing cultural character and potential to enhance its vibrant transformation, which will help boost the economy. Its transformation will improve community cohesion and social integration, with beneficial effects on mental health and educational opportunities.</p> <p>6. Encourages additional hotels in suitable locations across the City, with good access to attractions, including via public transport. Hotels can, however, displace potential office development.</p> <p>7. Aims to improve the inclusion and accessibility of streets that support world-class connections for all City users, potentially encouraging walking.</p> <p>8. Provision of green corridors to link up the City's Sites of Importance for Nature Conservation (SINCs).</p> <p>9. Promotes development which complements and (where appropriate) contributes to wider environmental enhancements along the green corridor routes.</p> <p>10. Seeks to maximise opportunities for leisure, culture, and recreation along the Thames riverfront, with improved greening, biodiversity and connectivity.</p> <p>11. Tall buildings will be focused in the City Cluster and Fleet valley, which are identified as areas suitable for tall buildings. Managing the location of tall buildings improves the quality and appearance of the built environment, whilst also protecting views.</p> <p>12. Applies both within the City and at national and international level – seeks to protect,</p>

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															<p>enhance, better reveal, celebrate and positively manage the historic environment, including enhancing public access and enjoyment of the City's cultural and heritage assets.</p> <p>13. Increased retail provision would serve City residents but in attracting more visitors to the area, particularly in the evening and at night, may result in an increase in noise, light pollution and nuisance if not appropriately managed.</p> <p>14. Office, retail and the cultural economy are likely to create large quantities of waste e.g. plastic waste, coffee cups and packaging. Increased retail offer would require frequent deliveries.</p> <p>15. Protecting the historic environment could restrict development and intensification of business premises.</p> <p>16. Green infrastructure provision together with improved greening and biodiversity has the potential to reduce the speed and volume of water runoff during intense rainfall events, reducing the risk of flash flooding, and helps reduce day time temperatures through shading and evapotranspiration.</p>

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<p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) Spatial Strategy draws together the spatial elements of the individual policies through which it is implemented, but does not address sustainability objectives in relation to climate mitigation and resilience. Consideration could be given to whether this theme has spatial dimensions that could be highlighted in the Spatial Strategy.</p> <p>Since the Spatial Strategy is implemented by other, more detailed and specific Plan policies, mitigation for the potential negative effects identified above is addressed in the appraisals of the individual policies and in the cumulative effects chapter of the SA.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) Spatial Strategy has been revised extensively. The previous version used the framing of the City Corporation's corporate plan 2018-2023, which is in the process of being replaced.</p> <p>In the refreshed version, this approach has been simplified and revised, to identify the strategic priorities for the development and use of land in the Square Mile. A series of strategic priorities have been set out, grouped together under the three sustainable development objectives (economic, social and environmental) set out in the NPPF.</p> <p>The new spatial strategy focuses on those aspects of the plan that have a spatial dimension, and brings together in one place the spatial elements of the individual policies through which it is implemented.</p>															

Health, Inclusion, and Safety

Healthy and Inclusive City

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S1	Healthy and inclusive City	↑ (1)	↑ (2, 5)	-	-	-	↑ (3)	↑ (4)	↑ (5, 6)	↑ (4)	↑ (2)	↑ (6)	↑ (7)	↑↑ (2, 4, 5, 6, 8)	↑ (8, 10)	1. An environment that is healthy and inclusive with appropriate facilities will attract businesses and skilled workers. There will be additional costs for developers, but on balance these costs will be outweighed by the benefits. 2. Buildings, spaces and nearby streets will be better and higher quality, which may encourage uptake of more active travel modes, and there will be reductions in air, noise, light, water and soil pollution. 3. The environment will be improved with less pollution (including from deconstruction waste). 4. Improving air quality, including through greening open spaces and the public realm, will help mitigate the effect of the urban heat island, improve biodiversity and aid carbon absorption. 5. Requiring Health Impact Assessment and creating healthier and inclusive buildings and spaces with appropriate facilities will improve people's enjoyment of open spaces and public realm for workers, residents and visitors. 6. Promotes equality, diversity and social inclusion in the design and use of buildings and public spaces, including the public realm, and through the provision of spaces that are free to access, whilst also preventing adverse impacts during construction.
HL1	Inclusive buildings and spaces	↑ (1)	↑ (2, 6)	-	↑↓ (11)	-	-	-	↑ (5)	-	↑ (2, 12)	↑ (6)	↑ (13)	↑ (1)	↑↑ (15)	
HL2	Air quality	↑ (16)	↑ (2)	-	↑ (17)	-	↑↑ (3)	↑ (18)	↑ (21)	↑ (4, 23)	↑↑ (19)	↑ (20)	-	↑↑ (20)	-	

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HL3	Noise	-	↑ (2)	-	-	-	↑ (3)	-	↑ (2)	↑ (23)	-	↑ (6)	-	↑ (2, 22)	-	<p>7. Policy promotes the protection and enhancement of social, educational and community facilities, including through the City's libraries.</p> <p>8. A large healthy workforce living all over the south-east will have regional benefits. Policy supports the protection and enhancement of public healthcare and educational facilities, in addition to further provision of public and private health facilities. St Bart's Hospital will be protected.</p> <p>9. Healthier and inclusive spaces will encourage greater usage and equality of opportunity.</p> <p>10. Promotes access to education, training and skills to improve access to employment for residents in neighbouring boroughs as well as City residents.</p> <p>11. It is unclear how this policy will apply to heritage assets including education and interpretation. Mitigation in design policy.</p> <p>12. Requires accessible streets and spaces for all City users and particularly for those with mobility difficulties.</p> <p>13. More inclusive buildings will encourage wider use of social and community facilities.</p> <p>14. Inclusive buildings and spaces will enable people with mobility difficulties to live independent and healthier lives.</p> <p>15. More inclusive spaces will encourage educational trips.</p> <p>16. A healthy environment with good air quality will attract businesses and skilled workers. There will be additional costs for developers, but on balance these may be outweighed by the benefits.</p>
HL4	Contaminated land and water quality	-	↑ (2)	-	-	-	↑ (3)	-	↑ (2)	↑ (25)	-	-	-	↑ (25)	-	
HL5	Location and protection of social and community facilities	↑↓ (26)	-	-	↑ (27)	-	-	-	-	-	-	↑ (6)	↑ (7)	-	↑ (28)	
HL6	Public toilets	↑↓ (30)	↑ (6, 29)	↑ (31)	-	-	-	-	↑ (32)	-	-	-	-	↑ (32)	-	

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																17. Improved air quality reduces acid damage on historic buildings. 18. Measures to improve air quality and limits on pollution and emissions supports climate change mitigation.
HL7	Sport and recreation	↕ (26, 37)	↑ (33)	↑ (33)	-	-	-	-	↕ (34)	↕ (34)	-	↑ (6)	↑ (6)	↑ (35)	-	19. Better air quality improves pedestrian experience. 20. Improved air quality will support improved health outcomes, with beneficial effects on residential amenity. 21. Public spaces with better air quality will encourage greater usage and mixing of people.
HL8	Play areas and facilities	-	↑ (33)	↑ (33)	-	-	-	-	↕ (34)	↕ (34)	-	↑ (37)	↑ (37)	↑ (38)	↑ (38)	22. Reducing light pollution will help reduce energy consumption. 23. Reducing pollution, including light and noise pollution, will have beneficial effects on biodiversity. 24. Disturbance from noise, vibration can impact on quality of life and mental health. 25. Remediation of contaminated land and prevention of land or water pollution will avoid potential harmful impacts on human health and wildlife.

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HL9	Health Impact Assessment (HIA)	↕ (39)	↑ (40)	-	-	↑ (41)	-	-	-	-	-	-	-	↑↑ (43)	-	<p>26. May compete for land with the business City but improves the range of facilities available to City workers.</p> <p>27. Maintains variety of uses including in historic buildings.</p> <p>28. Supports retention and development of social and community facilities, which includes libraries and educational facilities.</p> <p>29. The provision of inclusive public toilets in major developments, including Changing Places for disabled individuals and nursing mother facilities will promote inclusivity and help to meet the needs of all communities.</p> <p>30. May impose additional costs on some major developments but improves visitor experience.</p> <p>31. Increased provision of public toilets may reduce fouling of the streets in areas of night-time activity.</p> <p>32. Public conveniences allow people to visit the City, access work, leisure, educational and cultural opportunities thereby encouraging inclusiveness.</p> <p>33. Well-designed play areas will encourage physical activity and the use of outdoor space, which will increase surveillance, and social inclusion. Accessible play areas increase inclusion.</p> <p>34. Recreation and play facilities could impact on biodiversity and open space quality, depending on the type of activities and site characteristics.</p> <p>35. Participation in sport and recreation encourages healthy lifestyles.</p> <p>36. The provision of new sport and recreation facilities, particularly publicly accessible</p>

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																<p>facilities, will be encouraged in locations which are convenient to the communities they serve, which should limit disturbance to neighbouring occupiers.</p> <p>37. Play facilities make housing attractive for families.</p> <p>38. Opportunities for play improve health and educational experiences.</p> <p>39. Planning applications will incorporate measures to create healthier buildings and spaces. This will attract businesses and skilled workers. However, there will be costs for developers.</p> <p>40. Consideration of health impacts is likely to result in greater emphasis on placemaking and the quality of the public realm.</p> <p>41. Waste will be better managed by highlighting any health impacts of waste management practices.</p> <p>42. Planning applications will reduce traffic movements so movement on roads and air quality for pedestrians will improve. There will be more showers and changing facilities for active travel journeys.</p> <p>43. Health outcomes should improve.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage</p> <p>1) Review policies on play and sport and recreation to assess if wording is sufficient to be able to avoid these facilities causing disturbance to City businesses.</p> <p>2) Review policies on sport and recreation to assess if wording is sufficient to avoid sport and recreation facilities reducing greening and biodiversity opportunities.</p> <p>3) Add wording to policy on play to encourage inclusiveness between users of play facilities and local communities.</p> <p>Response at Regulation 19 Proposed Submission stage</p>																

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																<p>1) No change. Policies in this section were reviewed and there were sufficient policy references which state play, sport and recreation facilities would only be permitted where they would not be prejudicial to the business City or adversely affect the amenity of identified residential areas. Where facilities are proposed as part of major mixed-use developments the impact on existing facilities and neighbouring uses will be assessed.</p> <p>2) No change. Sporting and recreation facilities are encouraged in the Plan, as well as greening and biodiversity opportunities. If any conflict arises between the two policy aims this will be resolved by assessing the policies in the Plan as a whole.</p> <p>3) A new paragraph has been added in the supporting text of Strategic Policy S1 (Healthy and Inclusive City) which encourages major commercial developments to provide space that can be used for a variety of uses that meet community needs. The wording recognises that the health and well-being of the City's communities is dependent upon adequate community space being available.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) Add wording to Policies HL6 (Location and protection of social and community facilities) and HL8 (Sport and recreation) requiring sustainable design and construction, with reference to BREEAM.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) Added wording in the design policies requiring all development to prioritise sustainable design and construction.</p>

Safe and Secure City

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S2	Safe and secure City	↑↑↑ (1)	↑↓ (2,3)	↑↑↑ (1,3,13)	-	-	-	-	↑ (2)	-	↑↓ (2,3)	↑ (4)	-	↑ (4,5,15)	-	<p>1. Provides confidence for international businesses without undue visible presence.</p> <p>2. Security measures may inhibit accessibility.</p> <p>3. Promotes coordinated area-wide measures.</p> <p>4. Improves residential amenity.</p> <p>5. Contributes towards stress reduction.</p> <p>6. Promotes social and economic inclusion.</p> <p>7. The policy does not increase provision nor enhance the quality of open spaces.</p> <p>8. Security measures must be integrated into early development designs to adhere to 'secured by design' principles, avoiding the need for later retrofits that could impact public spaces or design quality.</p> <p>9. Prevents overcrowding. Reduces potential for anti-social behaviour.</p> <p>10. Improved road safety.</p> <p>11. Provides for safe social spaces.</p> <p>12. Policy requires security measures to be integrated into design and sympathetic to the public realm.</p> <p>13. Policy requires security measures to be sympathetic to any heritage assets.</p> <p>14. Policy caters to all but particularly those likely to experience crime and fear of safety.</p>
SA1	Publicly accessible locations	↑↑↑ (1)	↑↓ (2,3)	↑↑↑ (1,3)	-	-	-	-	↑ (7)	-	↑↓ (2,3)	-	↑ (8)	-	-	
SA2	Dispersal routes	-	↑ (9)	↑ (9,14)	-	-	-	-	-	-	↑ (10)	↑ (4)	↑ (11)	↑ (4,5)	-	
SA3	Designing in security	↑↑↑ (1)	↑ (8,12)	↑↑↑ (1,16)	↑ (12)	-	-	-	↑ (16)	-	↑↓ (2,3)	↑ (4)	-	-	-	

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																15. Policy mandates development proposals to incorporate resilience measures, ensuring that communities can better prepare for and recover from emergencies. 16. Provides for minimisation of the need for Hostile Vehicle Mitigation (HVM).

Mitigation proposed at Regulation 18 Draft Plan stage:

- 1) The Strategic, Crowded Places and Designing in Security policies should be amended to include reference to Open Spaces.
- 2) The Dispersal Routes policy should be amended to include reference to safe egress.

Response at Regulation 19 Proposed Submission stage:

- 1) No change. These policies already refer to the public realm and emphasise the importance of area-wide security measures, which may include open spaces. Other policies in the Open Spaces and Green Infrastructure section of the Plan seek to increase provision and enhance the quality of open spaces.
- 2) No further change. The Dispersal Routes policy had already been amended in the Draft Plan to include reference to the need for safe egress of people.

Mitigation proposed at Regulation 19 Revised Proposed Submission stage

No recommendations

Response at Regulation 19 Revised Proposed Submission stage

N/A

Housing

Housing

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S3	Housing	↑↓ (1, 2,3)	↑ (4, 8)	-	-	-	-	-	-	-	↑↑ (5)	↑ (6, 7)	-	-	-	<p>1. Policy restricts housing outside residential areas to protect commercial land uses.</p> <p>2. Level of housing would have marginal impact on housing shortage and costs for City workers.</p> <p>3. Provision of a greater amount of affordable housing will add costs to development and could displace other potential uses. However, affordable housing will support the City's and London's economy by assisting businesses to recruit and retain staff.</p>
HS1	Location of new housing	↑ (8)	↑ (8, 31)	↑ (9)	-	-	-	-	-	-	↑ (5)	↑ (10, 32)	↑ (10)	↑ (10, 32)	↑ (10)	<p>4. Enables efficient use of land.</p> <p>5. Provides some housing in City, City fringe and neighbouring boroughs (supporting text) reducing need to travel.</p> <p>6. Provides housing over the Plan period and in line with London Plan requirements up to 2029. Contributes to meeting housing needs by increasing % of affordable housing on public land and also prioritises co-living, build to rent, hostels, sheltered and extra-care housing.</p>
HS2	Loss of housing	↑ (11)	↑ (4)	-	-	-	-	-	-	-	-	↑ (12)	-	-	-	<p>7. Requires proportion of affordable and accessible</p>

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HS3	Residential environment	↑ (8)	↑ (8)	↑ (9)	-	-	↑ (13, 14)	-	-	-	-	↑ (10)	-	↑ (15)	-	<p>housing, with increased % of affordable on public land (some of which may be in neighbouring boroughs).</p> <p>8. Prevents conflicts between residents and businesses by clustering housing, preventing adverse effects on residential amenity, requiring high quality accommodation and enhancing the public realm.</p> <p>9. Clustering housing enhances passive security.</p> <p>10. Clustering enhances residential amenity, access to services and decreases isolation.</p> <p>11. Reduces pressure for additional housing, providing accommodation for City workers.</p> <p>Prevents single residential units blocking commercial development.</p> <p>12. Retains housing stock that meets a housing need.</p> <p>13. Addresses noise pollution.</p> <p>14. Addresses light pollution.</p>
HS4	Housing quality standards	-	↑ (8)	↑ (34)	-	↑ (16)	-	-	↕ (17)	-	-	↑ (18)	-	↑ (15)	-	
HS5	Short term residential letting	↑↓ (20, 29)	-	↑ (25)	-	-	-	-	-	-	↑ (20)	↕ (28)	-	-	-	

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HS6	Student accommodation and hostels	↑↑↑ (21)	-	↓ (25)	-	-	-	-	-	-	↑↑ (22)	↑ (18, 23)	-	↑ (15)	↑ (27)	15. Protection of residential amenity and high-quality living environment good for mental health. 16. Provides area for waste and recycling bins (supporting text). 17. Maximising opportunities for communal open and leisure space, and providing amenity space where possible, may not protect existing levels of open space – could mention multi-use open space. 18. Aims to ensure high-quality new housing. 19. Can result in noise pollution although policy seeks to avoid this. 20. Provides necessary business accommodation without need for daily commuting.
HS7	Older persons housing	-	-	-	-	-	-	-	-	-	-	↑ (26)	-	↑ (15, 26)	-	21. Supports higher education, which contributes to London's role as a World City. 22. Seeks to restrict student housing to educational establishments in CAZ – reduces need to travel. 23. Provides suitable student housing reducing student occupation of mainstream housing. 24. Provides accommodation for legal sector workers reducing the need for daily commuting.
HS9	Self and custom housebuilding	-	↑ (30)	-	-	-	-	-	-	-	-	↑ (26, 27)	-	-	-	

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																<p>25. Short-term tenants / residents may cause disturbance and anti-social behaviour.</p> <p>26. Provides suitable housing to meet specific needs.</p> <p>27. Supports educational opportunities.</p> <p>28. May compete for scarce land with permanent housing.</p> <p>29. May compete with offices.</p> <p>30. May not represent an efficient use of land in the City's high-density environment.</p> <p>31. Prioritises the inclusion of current affordable housing tenants throughout the regeneration of housing estates giving them the chance to influence proposals.</p> <p>32. Regeneration schemes will seek opportunities to improve social infrastructure and open spaces within the estate. This will help protect established local communities.</p> <p>33. Housing meets standards for Secured by Design (or similar).</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Resist the loss of housing. Discussed whether should add wording to suggest that when a housing unit is lost there should be some financial contribution to offset the loss.</p> <p>2) Process flagged up that we should be sure we are being consistent and say we do not want an over concentration of student housing as well as saying we do not want concentrations of hotels or short-lets. Do not want to single students out. Address over-concentration by balance of uses wording?</p>																

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																<p>3) Residential uses outside clusters and loss of individual units could protect at risk/historic buildings.</p> <p>4) Discussed whether older persons housing is given too much emphasis in the Plan, compared to other types of housing. Discussed whether the older persons policy should be incorporated into the general housing policy. The fact that all housing has to include accessible units means older people could live in mixed developments to create mixed and balanced communities. Discussed whether older people should be supported to remain in their own home and if elderly people should be helped to downsize from a larger unit to a smaller one.</p> <p>Response at Regulation 19 Proposed Submission stage:</p> <p>1) No change. There is no policy basis for such a course of action.</p> <p>2) All references to “over concentration” have been removed from the Plan to ensure consistency. As suggested in the IIA, the issue of over-concentration will be dealt with through ensuring an appropriate balance of land uses.</p> <p>3) A reference has been added to the supporting text to Policy S3 (Housing) indicating that there may be occasional opportunities for new residential development on appropriate sites near residential areas, such as through the re-use of heritage assets.</p> <p>4) It was decided that a separate policy on older persons accommodation is justified to reflect an increase in the elderly population in the City. Wording was added to Policy HS7 (Older Persons Housing), formerly referred to as HS8, and its supporting text to emphasise the importance of enabling older people to be able to remain in their own homes. It is considered outside the remit of the planning system to suggest that older people should downsize to smaller accommodation.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) Add wording to housing policies requiring sustainable design and construction, with reference to BREEAM.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) Added wording in the design policies requiring all development to prioritise sustainable design and construction.</p>

Offices

Offices

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S4	Offices	↑↑↑ (1, 6, 9)	↑↓ (2)	-	↑ (3)	↑↓ (4,6, 12)	↑↓ (8)	↑↓ (8)	-	-	↑↓ (5, 13)	-	-	↑ (7)	↑↑ (9)	<p>1. The City is an internationally important centre for economic activity and office-based employment, and there will be a significant amount of office floorspace delivered over the Plan period.</p> <p>2. Efficient land use, but increased pressure on public realm and the City's skyline.</p> <p>3. Increased development puts increased strain on heritage.</p> <p>4. Increasing the City's office stock will generate increased levels of construction and operational waste.</p> <p>5. Increased worker density places more strain on public transport but development within the City makes efficient use of existing transport networks.</p> <p>6. Policy will ensure new office floorspace is flexible and can have different layouts and configurations.</p> <p>7. Policy encourages affordable workspace, where appropriate,</p>
OF1	Office development	↑↑↑ (1)	↑↓ (2, 12)	↑ (15)	-	↑↓ (4,12)	↑↓ (8, 12)	↑↓ (8, 12)	-	-	↑ (13)	-	-	↑ (7, 16)	-	
OF2	Protection of existing office floorspace	↑↑↑ (1, 9)	-	↑ (15)	-	-	↑ (12)	↑ (12)	-	-	-	↑↓ (14)	-	-	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																reducing economic inequality, thus supporting public health and overall well-being. 8. Promotes sustainable building design and upgrades to environmental performance of buildings, although office development will increase energy demands.
OF3	Temporary 'meanwhile' uses	↑ (10)	↑ (10)	↑ (15)	↕ (11)	↕ (11)	↕ (11)	↕ (11)	-	-	↕ (11)	-	↕ (11)	↕ (11)	↕ (11)	9. The policy will increase/retain office floorspace and therefore jobs and associated training opportunities in the City. 10. Brings into use an otherwise vacant site. 11. Depends on the meanwhile use of the site. 12. Reduces need for future redevelopment by promoting retrofitting, requiring flexibility, and enabling the transformation and adaptation of space to support new uses and different occupiers. 13. Reducing the need to travel with supporting uses. 14. Policy allows office floorspace in or near identified residential areas to be lost where this would create additional housing. 15. Active frontages, which is a form of passive surveillance. 16. Encourages healthy working environments that promote wellbeing.

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <ol style="list-style-type: none"> 1) Negative impacts need to be mitigated through the design of new developments and their management. 2) Be more specific in terms of what would be allowed as a meanwhile use. <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) No change. Policy OF1 (Office Development) already states that office development should be of outstanding design and an exemplar of sustainability. There is no need to repeat that in Policy S4. 2) No change. Policy OF3 (Temporary 'Meanwhile' Use of Offices) states that uses other than those that would result in adverse impacts on amenity or on the primary business role of the City will be permitted. This avoids over prescribing land use as the acceptability of different meanwhile uses will vary according to site conditions and location. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Policies could state that offices within heritage assets will be protected, and also support their enhancement. <p>Response at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) The policies have been revised to strengthen the City Corporation's long-standing approach of supporting economic and employment growth in the City through the delivery of additional office floorspace; resisting the loss of existing offices in many instances; and seeking to encourage investment in existing office stock. Policy OF1 (Office Development) seeks to prioritise retrofitting of existing buildings. 																

Retail

Retail and Active Frontages

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S5	Retail and active frontages	↑ (1, 25)	↑ (2)	↑↓ (3, 4)	↑↓ (5)	↑↓ (10)	↑↓ (6)	↑↓ (11)	-	-	↑↓ (7)	↑↓ (8)	↑ (9)	↑ (7)	-	<p>1. Retail contributes to the City's visitor economy and provides employment.</p> <p>2. Supports retail and town centre uses that provide active frontages supported by complementary uses that increase footfall and vitality to public realm.</p> <p>3. Increases passive surveillance however potential issues regarding crime and safety.</p> <p>4. More risk of anti-social behaviour.</p>
RE1	Principal Shopping Centres	↑ (1)	↑ (2, 12, 19)	↑↓ (3, 4)	↑↓ (5)	-	-	-	-	-	↑↓ (7, 13)	-	-	-	-	<p>5. Promotes large-scale retail development in the Principal Shopping Centres (PSCs), some of which include historic markets and other heritage buildings (e.g. Leadenhall Market and Fleet Street).</p> <p>6. May result in an increase in noise, light pollution and nuisance if not appropriately managed.</p> <p>7. Increased retail offer and ground floor frontages that improve and activate streets could encourage more walking, but retail uses often require frequent deliveries.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
RE2	Active frontages	↑ (1, 14)	↑ (2)	↑ (3)	-	-	-	-	-	-	↑↓ (7)	↑ (14, 15)	↑ (15)	↑ (14)	-	8. Increased retail provision would serve City residents but may result in anti-social behaviour if not appropriately managed. 9. Many retail uses provide and enhance the social, leisure and cultural offer of a place. 10. Uncertain as retail produces large quantities of waste e.g. plastic waste, coffee cups and packaging. 11. Depends on how shops/market stalls are designed and serviced. 12. The four PSCs are distinct from the rest of the City and their active frontages will contribute to an attractive public realm. 13. Focusing retail development in PSCs and encouraging active frontages may reduce the overall need to travel. 14. Protects residential amenity. 15. Policy seeks to protect convenience retail units that serve residential areas. 16. Policy limits opportunity to redevelop for alternative uses, which may also be achieved through conditions attached to permissions (supporting text). 17. Safeguards uses and premises that are historically significant to the City, potentially by attaching conditions to planning permissions (supporting text). 18. Safeguards uses and premises that are culturally significant to the
RE3	Specialist retail uses and clusters	↑↓ (1, 16)	-	↑ (12)	↑ (17)	-	-	-	-	-	-	-	↑ (18)	-	-	
RE4	Markets	↑ (1, 19)	↑ (20)	↑↓ (3, 4)	↑↓ (21)	↑↓ (20)	↑ (6)	↑ (11)	↑ (22)	-	↑↓ (23)	↑ (14)	↑ (19)	↑ (7, 24)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>City by attaching conditions to planning permissions.</p> <p>19. Enhances the vitality and vibrancy of retail areas by promoting a diverse mix of retail, entertainment, culture, and other suitable uses.</p> <p>20. Improves vibrancy of built environment but potential for increased disposable waste from temporary markets.</p> <p>21. May have an impact on the setting of heritage assets, depends on location and management.</p> <p>22. Multiple uses of open space encouraged but markets must not involve the permanent loss of an open space.</p> <p>23. Markets activate streets and so are likely to encourage walking, but require setting up/taking down so may cause temporary obstruction.</p> <p>24. Increases the chance of more spontaneous social interaction.</p> <p>25. Active frontages may contribute towards economic growth by increasing footfall.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Historic environment. Does the policy provide mitigation for uncertainty regarding heritage assets in Leadenhall Market and Fleet Street?</p> <p>2) Waste. Could include supporting text promoting reuse/reduced packaging associated with the high level of food retail in the City and appropriate waste management facilities and clean up procedures for temporary markets.</p> <p>3) Energy. Could emphasise the design of shopfronts to minimise heat loss through doors, use of air-conditioning and increased use of electric vehicles etc.</p> <p>4) Provide clarity about whether markets would be allowed in open spaces.</p> <p>Response at Regulation 19 Proposed Submission stage:</p>																

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																<p>1) The supporting text to Policy RE1 (Principal Shopping Centres) already recognises that Fleet Street's outstanding heritage provides opportunities to develop a more distinctive retail mix in the Fleet Street PSC. A change has been made to the supporting text regarding Leadenhall Market to refer to the character <u>and significance</u> of the historic Leadenhall Market, which will be maintained and enhanced as a visitor and retail destination.</p> <p>2) Additional wording has been added to the supporting text to Policy RE2 (Retail Links), which mentions litter as one of the potential amenity impacts that needs to be considered in relation to retail and town centre uses. Policies on reducing waste from all types of land use are included in the Circular Economy and Waste section of the Plan.</p> <p>3) No change. These issues are dealt with elsewhere in the sections of the Plan relating to Design and Vehicular Transport and Servicing.</p> <p>4) Additional wording has been added to Policy RE5 (Markets) stating that proposals for markets and temporary pop-ups will be permitted where they would not involve the permanent loss of open space or harm the character of that space.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) Reference should be made to the design of shopfronts particularly in relation to energy, and how shopfronts can contribute to climate mitigation and resilience.</p> <p>2) There could be more references to protecting and enhancing the historic environment in these policies.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) and 2) Added wording in relation to protecting and enhancing historic thoroughfares and markets (such as Fleet Street and Leadenhall market) and increasing the City's appeal by capitalising on its unique heritage.</p>

Culture and Visitors

Culture and Visitors

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S6	Culture and visitors	↑↑ (1, 19)	↑ (2, 17, 19)	↑ (2, 20)	↑ (3)	↓ (4)	↑↓ (5)	↓ (12)	↑ (2)	↑↓ (16)	↑↓ (6)	↑↓ (7)	↑ (8, 17)	↑ (8, 17, 20)	↑ (8)	<p>1. Increased culture and night-time activity and increased visitor numbers will boost the economy. The promotion of creative industries, cultural services, and their expansion through the provision of appropriate workspaces and digital infrastructure, may result in competition for space with the business City, but overall will make the City a more attractive location and attract businesses and skilled workers.</p> <p>2. Increased creative and cultural provision, alongside supporting visitor facilities, will create more vibrant spaces and add interest to the public realm. Active frontages and more</p>
CV1	Protection of existing visitor, arts and cultural facilities	↑ (1, 21)	↑ (2, 21)	↑ (2)	↑ (22)	-	-	-	-	-	-	-	↑ (8)	↑ (8)	↑ (8)	
CV2	Provision of arts, culture and leisure facilities	↑ (1)	↑ (2)	↑ (2)	-	-	-	↓ (12)	↑ (2)	↑↓ (16)	-	-	↑ (3, 8)	↑ (8)	↑ (8)	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
CV3	Provision of visitor facilities	↑ (19, 23)	↑ (2, 24)	↑ (2)	-	-	-	-	↑ (2)	↑↓ (16)	-	-	↑ (8)	↑ (8)	↑ (8)	<p>people will mean more surveillance.</p> <p>3. Heritage at the heart of cultural placemaking and creating spaces and experiences that celebrate the City's history and culture. Areas of cultural significance, including cultural buildings, will be protected and enhanced.</p> <p>4. Increases in the cultural and night-time economy sector are likely to create more waste. Need to minimise waste produced.</p> <p>5. Increased activities may result in improved land and water quality, but night-time aspect and increased volume of people/traffic may increase noise/light pollution/nuisance.</p> <p>6. Expanding cultural and night-time facilities to provide experiences at various times throughout the week will help alleviate congestion during</p>
CV4	Hotels	↑↓ (9)	↑ (25)	↑ (2)	↑ (10)	↑↓ (25)	↑↓ (5)	↑↓ (12, 26)	-	-	↑ (27)	-	-	-	-	
CV5	Evening and night-time economy	-	-	-	-	-	↑↓ (5)	-	-	-	-	↑↓ (13, 14)	-	↑↓ (13, 14)	-	
CV6	Public art	-	↑ (17)	↑ (17)	-	-	-	-	-	-	-	-	↑ (8)	↑ (8, 17)	↑ (8)	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>peak hours, but it will increase demands on public transportation and necessitate additional servicing and deliveries.</p> <p>7. Potential residential units may be displaced by cultural/visitor development, but the improved environment and cultural offer will make the City a nicer place to live.</p> <p>8. Increased cultural activity, public art, galleries, spaces and facilities for visitors etc. will add to vibrancy and improve community cohesion and social integration. This should improve mental health and educational opportunities.</p> <p>9. Hotels can boost the local economy but also displace potential office development.</p> <p>10. Supports the use of historic buildings. Boutique hotels could be the only viable use</p>

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																<p>for historic buildings at risk.</p> <p>11. Increased risk of anti-social behaviour.</p> <p>12. New cultural/visitor developments may use resources more efficiently but will still use resources.</p> <p>13. Seek to ensure that evening and night-time entertainment does not disturb residents or noise-sensitive areas.</p> <p>14. Disturbance from night-time activities may impact on resident's mental health due to causing disturbance to sleep.</p> <p>15. Evening and night-time economy includes a wide range of different uses which are likely to have varying impacts on different groups.</p> <p>16. Increased cultural and visitor facilities may lead to greater appreciation of the City's biodiversity and promote greening, but could have adverse impacts through</p>

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																<p>increased numbers of people, waste, noise etc.</p> <p>17. Seeks to ensure that public art is located appropriately, considering the safety of pedestrians, disabled people, and other road users, which should encourage social cohesion and also enhance local character of the public realm.</p> <p>18. Promotes a lively night-time economy in areas with cultural and tourist attractions served by night transport options, which will ensure for safe and convenient transportation for night users and minimise disturbances to residents and workers.</p> <p>19. Supports the temporary use of vacant spaces for creative and cultural activities, which brings into use an otherwise vacant site.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>20. Focusing night-time activity around cultural and tourist attractions where public transport such as the Night Tube and Night Buses are available will increase feelings of safety.</p> <p>21. The loss of existing visitor, arts and cultural facilities will be resisted, maintaining their contribution to the area and its economy.</p> <p>22. Encourages the provision of arts, culture and leisure facilities in historic buildings and spaces, contributing towards their enjoyment.</p> <p>23. Visitor facilities will support new cultural developments, with beneficial effects on the economy.</p> <p>24. Visitor facilities, including seating and tables, will enhance the public realm.</p> <p>25. Satisfactory arrangements for pick-up/drop-off, service delivery vehicles,</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																waste storage and taxis that will not adversely effect the public realm. 26. Must address the sustainability challenges associated with the City's BREEAM priorities. 27. Hotels in suitable locations that provide good access to attractions, including via public transport.
<p>Mitigation proposed Regulation 18 at Draft Plan stage:</p> <ol style="list-style-type: none"> 1) Applicants must take into account waste that may be produced as a result of night-time economy schemes. 2) To mitigate disturbance to residents from the night-time economy, planning and licensing departments need to work more closely together, as advised by the GLA. <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) Wording has been added to Policy CV4 (Evening and Night-Time Economy) to indicate that waste is one of the environmental amenity factors that needs to be considered in proposals for evening and night-time entertainment and related uses. 2) No further change. The supporting text to Policy CV4 (Evening and Night-Time Economy) already references the need for planning and licensing to work together. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) No recommendations. <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>																

Infrastructure

Infrastructure and Utilities

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S7	Infrastructure and utilities	↑↑ (1)	↑ (2,5)	-	↑↓ (2,6)	↑ (3)	↑ (3)	↑ (3, 10, 11)	-	-	↑ (4)	-	-	-	-	1. The policy supports state-of the-art digital connectivity and utilities infrastructure to support business, enabling the City to grow and compete. In turn, it will provide the business environment to attract and retain global financial and business services.
IN1	Infrastructure provision and connection	↑↑ (1)	↑ (5)	-	↑↓ (6)	↑ (3)	↑ (3, 12)	↑ (3, 10, 12)	-	-	↑ (4)	-	-	-	-	2. The policy aims to minimise adverse impacts on visual amenity, character and appearance of the City, and its heritage assets, therefore enhancing the built environment and the public realm.
IN2	Infrastructure capacity	↑↑ (13)	-	-	-	-	-	↑↓ (7)	-	-	-	-	-	-	-	3. The policy aims to reduce the demand for power, water and utility services. 4. Good connectivity reduces the need to travel. 5. Makes efficient use of land.

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																6. New infrastructure may potentially have negative impacts on the City's heritage assets.
IN3	Pipe subways	↑↑ (1)	↑ (8)	-	↑ (8)	-	↑ (8)	-	↑ (8)	-	↑ (9)	-	-	-	-	7. Development must take into account the impacts of climate change on infrastructure capacity. 8. Pipe subways provide protection and reduce visibility for unsightly infrastructure. 9. Pipe subways reduce the long-term need for street works which cause disruption and congestion. 10. The shift to an increasingly digital-reliant economy will facilitate the transition towards a zero carbon and climate resilient City. 11. Supports sustainable building design and demand management measures. 12. Supports provision of

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling.</p> <p>13. Policy ensures development will not lead to any capacity or reliability issues relating to infrastructure, maintaining the City's competitiveness.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Include reference to heritage assets to ensure the provision of utilities and other infrastructure does not cause harm to same.</p> <p>Response at Regulation 19 Proposed Submission Stage:</p> <p>1) Policy IN1 (Infrastructure Provision and Connection) has been amended to include reference to the provision of well-designed and located mobile digital infrastructure.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>N/A</p>																

Design

Design

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S8	Design	↑ (1)	↑ (2)	↑ (7, 41)	↑ (3)	↑ (25, 34)	↑ (4, 12, 25, 32)	↑↑ (4, 25, 35, 38, 39)	↑ (5, 32)	↑ (5, 35)	↑ (9)	-	-	↑ (8,32)	-	<p>1. Innovative, sustainable, and high-quality exemplary design creates a more desirable location for companies.</p> <p>2. Policy actively looks to optimise site capacity, enhance the quality of the built environment and public realm, in addition to the creation of new spaces.</p> <p>3. Conserves character of the area and seeks to protect and enhance the historic environment.</p> <p>4. Requirement for high</p>
DE1	Sustainable design	↑↓ (1,10)	-	-	-	↑ (25, 34, 36)	↑ (4)	↑ (4, 11, 36)	-	-	-	-	-	-	-	
DE2	Design quality	↑ (1)	↑ (2, 6, 42)	↑ (41)	↑ (3)	↑ (11)	↑ (12, 30, 35)	↑ (11)	-	↑ (13)	↑↓ (20, 22)	-	-	↑ (8, 22, 26)	-	
DE3	Public realm	↑ (1)	↑ (2, 37)	↑ (2, 6, 14)	↑ (3)	↑ (45)	↑ (15, 30, 43, 45)	↑ (40, 16, 17, 43)	↑ (5, 17, 31)	↑ (17, 40)	↑ (18, 22, 44)	-	↑ (19, 26)	↑ (8,22, 26, 32, 37, 43)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
DE4	Terraces and elevated public spaces	↕ (23)	↑ (2)	↑ (46)	↑ (24)	-	-	-	↑ (5)	↑ (13)	-	↑ (26)	-	↑ (26)	-	environmental standards. 5. Policy seeks to deliver publicly accessible spaces, sometimes including at upper levels of buildings. 6. Policy promotes inclusive and accessible buildings and public realm. 7. Requires security and safety measures as an integral part of design. 8. Improved public realm and open
DE5	Shopfronts	↑ (21)	↑ (2)	↑ (41)	-	-	↑ (33)	↑ (35)	-	-	-	-	-	↑ (32)	-	
DE6	Advertisements	↑ (28)	↑ (2, 27, 28)	-	-	-	-	-	-	-	-	-	↕ (28)	-	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
DE7	Daylight and sunlight	↓ (29)	↑ (30)	-	-	-	↑ (31)	-	↑ (31)	↑ (31)	-	↑ (32)	-	-	-	spaces provide health benefits. 9. Increased permeability around the City with a mixture of uses in one area, reducing travel-time. 10. Higher environmental standards (e.g. BREEAM and NABERS UK) increases construction costs. 11. Requires use of durable materials that are low carbon (supporting text). 12. Policy seeks to minimise and mitigate adverse wind and solar glare impacts, and ensures appropriate lighting. 13. Supports urban greening.
DE8	Lighting	-	↑ (2)	↑ (14)	↑ (3)	-	↑ (33)	-	-	-	-	-	-	↑ (33)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>14. Safe and functional public realm promoted.</p> <p>15. Policy requires sensitive co-ordination of lighting.</p> <p>16. Promotes Sustainable Drainage Systems and rainwater recycling.</p> <p>17. Seeks the inclusion of high-quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements.</p> <p>18. Visually attractive facades and active street frontages would improve and activate streets.</p> <p>19. Public realm enhancements encourage</p>

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																<p>cultural activity and social interaction.</p> <p>20. Emphasises pedestrian permeability – servicing and vehicle permeability not addressed.</p> <p>21. Retail offer will contribute to economic growth.</p> <p>22. Improved permeability and pedestrian amenity encourages walking and active lifestyles.</p> <p>23. Terraces and viewing galleries add to development costs but can provide a valued amenity for office occupiers.</p> <p>24. Policy aims to retain and enhance historic roof forms.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>25. Policy emphasises a 'retrofit first' approach, prioritising the retention and refurbishment of existing buildings to enhance their environmental performance, which will reduce construction and deconstruction waste whilst also minimising embodied carbon.</p> <p>26. Protects residential amenity.</p> <p>27. Avoids projecting adverts which may obstruct movement, inappropriate illuminated signs, and display of advertisements above ground floor level.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>28. Restrained approach to advertising may impact on the City's vibrancy although advertising flags and banners could be suitable to support cultural institutions, and high-quality temporary advertising for one-off events may contribute positively to the City's vibrancy.</p> <p>29. Stringent daylight/sunlight policies could stop some new developments.</p> <p>30. Ensures adequate daylight and sunlight in line with BRE guidance.</p> <p>31. Policy seeks to protect the daylight/sunlight to open spaces.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>32. Delivers improvements in air quality, open space and views, which will improve amenity and wellbeing of users.</p> <p>33. Requires measures to reduce the impacts of internal and external lightning to reduce the potential for light spillage and protect the amenity of light-sensitive uses.</p> <p>34. Adoption of circular economy principles will reduce the long term need for waste management facilities.</p> <p>35. Embeds climate resilience into design.</p>

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																<p>36. Prioritises the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments.</p> <p>37. Public art enhances the public realm thereby creating pleasant and safe spaces encouraging social cohesion as well as enhancing local character.</p> <p>38. Will deliver a net zero Carbon City.</p> <p>39. Contributes to wider sustainability of</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>neighbouring boroughs.</p> <p>40. Provision of green infrastructure, including tree planting, soft landscaping and the delivery of net gains in biodiversity, and to link up existing habitats, green spaces and routes to provide green corridors.</p> <p>41. Promotes active frontages as a form of passive surveillance.</p> <p>42. Roofscape to add visual interest and complement the building.</p> <p>43. Consideration given to microclimatic conditions including temperature, wind, exposure</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																to noise, air pollution to create spaces that encourage people to dwell and spend time. 44. Promotes active travel. 45. Free water drinking fountains will reduce use of plastic bottles. 46. Safety and security risks addressed and incorporation of hostile vehicle mitigation.
<p>Mitigation proposed at Regulation 18 Draft Plan Stage: 1) Daylight and Sunlight policy needs to be altered to reflect the highly urban area of the City of London</p> <p>Response at Regulation 19 Proposed Submission Stage 1) Policy DE8 (Daylight and Sunlight) has been amended to require development proposals to demonstrate that daylight and sunlight to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, which reflects wording in the London Plan and the NPPF.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage 1) Consideration should be given to servicing and vehicle permeability, particularly in relation to Policy DE3: Public realm.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p>																

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																1) Added wording to the transport policies in relation to minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle

Transport

Vehicular Transport and Servicing

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban green	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S9	Transport and servicing	↑↑↓↓ (1, 1a/b)	↑ (2, 22)	↑ (2)	-	↑ (1)	↑ (2)	↑ (2,3, 4)	-	-	↑↑ (5)	-	-	↑ (2)	-	1. Depends on how servicing / consolidation works. 1a. Could increase costs for businesses serving the City. 1b. Could reduce costs of delivery. 2. Aims to provide safer, more attractive streets with lower pollution levels for pedestrians, keeping through traffic on London access roads. 3. Promotes infrastructure for alternative-fuel vehicles and zero emissions vehicles. 4. Reduces vehicle numbers and identifies opportunities to use parking reductions and restrictions, reducing reliance on the private car
VT1	The impacts of development on transport	↑ (7)	↑ (22)	↑ (13, 25)	-	↑↑ (6)	-	-	-	-	↑ (7)	-	-	-	-	
VT2	Freight and servicing	↑↑ (1)	↑ (2)	↑ (8)	-	↑↑ (10)	↑↑↓↓ (9, 9a)	↑↑↓↓ (9, 9a)	-	-	↑↑↓↓ (9, 9a, 16, 18)	-	-	↑↑↓↓ (9, 9a, 23)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
VT3	Vehicle parking	↑ (11)	↑↓ (11, 12, 12a, 15)	↑ (13)	-	-	↑ (12, 15)	↑ (12)	-	-	↑↓ (12, 12a)	-	↑ (14)	↑ (12)	-	and associated emissions. 5. Promotes and improves public transport provision. 6. Construction logistics plans will address waste movements. 7. Transport Assessments and Travel Plans ensure that transport issues are addressed for major development. 8. Reduces number of HGV vehicles coming into the City, including those that could pose a security threat. 9. Consolidation centres could affect air quality, transport and movement in other boroughs depending on their location, increasing emissions in those areas although reducing in the City. 9a. Some routes will improve but some may
VT4	River transport	↑↑ (26)	↑ (24)	-	↑ (24)	↑ (17)	↑↓ (16)	↑↓ (16)	-	-	↑ (18)	-	-	↑ (16, 24)	-	
VT5	Aviation landing facilities	↑↑↓ (21)	↑ (19)	↑ (20)	-	-	↑ (19)	-	-	-	-	-	-	-	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>experience more traffic.</p> <p>10. Not clear how waste consolidation will work and whether it will result in greater need for waste storage space.</p> <p>11. Enables use of land for productive activities – not just car parking, which is an efficient use of land.</p> <p>12. Reduces car use and associated congestion and air quality/ carbon emission impacts with improved health outcomes.</p> <p>12a. Reduces availability of short-term parking for dropping off, deliveries and loading.</p> <p>13. Reduces risk of vehicle related safety/ terrorist incidents in the City.</p> <p>14. Could release car parks for cultural events –</p>

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																<p>temporary or meanwhile uses.</p> <p>15. Promotes car-free development except for designated Blue Badge Holders.</p> <p>16. Takes traffic off the roads but boats can cause air pollution with high carbon emissions, and adverse effects on water quality.</p> <p>17. The policy supports improving Walbrook Wharf's operations, which includes its waste transfer station, and exploring its use for goods transfer, without compromising its safeguarded role.</p> <p>18. Improves movement of goods and people.</p> <p>19. Protects environment from noise and disturbance associated with helicopters.</p> <p>20. Allows for emergency</p>

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																<p>response helicopters.</p> <p>21. Could deter some businesses but proximity to City Airport and improved links with other London airports provides alternatives.</p> <p>22. Promotes enhanced quality of the City's streets and public spaces.</p> <p>23. The provision of shredding operations within serving bays will minimise potential disturbances to the community including noise, safety risks, and traffic congestion.</p> <p>24. Permanent mooring of vessels will be resisted, which will preserve views, heritage, ecology, biodiversity, archaeology, noise and other disturbance, and enhance public</p>

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																<p>enjoyment of the riverfront.</p> <p>25. Development will have a positive impact on highway safety.</p> <p>26. Increase in passenger and freight transport by river to/from the City could have beneficial effects on the economy.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan Stage:</p> <p>1) Clear monitoring framework is needed to assess the impact of consolidation centres approach</p> <p>Response at Regulation 19 Proposed Submission Stage:</p> <p>1) Wording has been added to the supporting text to Policy VT2 (Freight and Servicing), which states that the City Corporation will work with developers and occupiers to monitor the reductions in deliveries achieved through consolidation as part of the implementation of the Transport Strategy. The proposed IIA monitoring framework includes Transport Strategy indicators linked to the impacts of consolidation centres.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) Further clarification within Policy VT2 (Freight and servicing) regarding how waste consolidation will be implemented.</p> <p>2) Further reference and provisions made for climate-resilient transport.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) Strengthened policy requiring major commercial development to provide for freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites. Supporting text highlights the City Corporation’s Transport Strategy which aims to use the planning process to require consolidation for new developments. Last mile logistics hubs can facilitate more deliveries on foot, by cycle and by small electric vehicles.</p> <p>2) Policy highlighting the Healthy Streets Approach in development proposals; and seeking to improve conditions for safe, convenient, comfortable, inclusive and accessible walking, wheeling and cycling, while incorporating climate change adaptation.</p>																

Active Travel and Healthy Streets

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S10	Active travel and healthy streets	↑ (1)	↑ (2, 3, 4, 23)	↑ (2, 23)	-	-	↑ (5)	↑ (5)	↑ (6)	-	↑↑↓↓ (7)	-	-	↑ (8,9, 23)	-	1. Depends on access for servicing. 2. Provides safer more attractive pedestrian priority streets. 3. Improves the quality and permeability of the City's streets and spaces in ways that enhance inclusion and accessibility. 4. Concentrates vehicles and pollution on surrounding streets. 5. Air quality, noise and climate resilience all addressed. 6. Creates additional traffic free open spaces. 7. Improves movement for pedestrians and cyclists at the potential expense of vehicle movement e.g. buses. 8. Healthier less polluted streets encourage more active travel, with beneficial effects on physical and mental health and wellbeing. 9. Walking and cycling provide more equitable means of transport. Policy takes account of disabled people's needs. 10. New and enhanced pedestrian and cycle routes improve travel choice for City workers. 11. Historic routes safeguarded. 12. City's characteristic network of accessible buildings, streets, courts and alleyways will be
AT1	Pedestrian movement, permeability and wayfinding	↑ (10)	↑ (2, 3, 12)	↑ (2)	↑ (11, 12)	-	↑ (12)	↑↓ (14)	↑ (6)	-	↑ (3, 8)	-	-	↑ (3, 8)	-	
AT2	Active travel including cycling	↑ (10)	↑ (2, 16)	↑ (2)	-	-	↑ (15, 16)	↑ (15, 16)	-	-	↑ (15)	-	-	↑ (15, 16)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
AT3	Cycle parking	↑↓ (17, 22)	↑↓ (13, 16, 18, 20,)	↑ (13, 19, 21,)	-	-	↑ (16)	↑ (16)	-	-	↑ (16)	-	-	↑ (16)	-	<p>respected, maintained, restored and better revealed in ways that celebrate their character and heritage.</p> <p>13. Dockless cycle and scooter rental services mandate users to leave cycles and scooters in designated parking locations.</p> <p>14. No mention of climate resilience or greening of streets.</p> <p>15. Facilitating active travel reduces emissions from vehicles.</p> <p>16. Provision of conveniently located, easily accessible, safe and secure changing facilities and cycle parking encourages active travel.</p> <p>17. Reduces space for offices but attracts City workers.</p> <p>18. Keeps streets clear of parked bikes.</p> <p>19. Provides secure cycle storage – reduced opportunity for theft.</p> <p>20. Cargo bikes making deliveries could cause congestion on pavements.</p> <p>21. Could mention facilities needed for folding bikes and scooters.</p> <p>22. Need monitoring of cycle parking use to check whether space continues to be available for cycle parking.</p> <p>23. Promotes the Healthy Streets Approach in development</p>

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																proposals and improvements to the public realm.
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <ol style="list-style-type: none"> 1) Include mention of greening and climate resilience in text. 2) Could include reference to folding bikes and scooters in text. <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) No change. Emphasis on Healthy Streets in this section includes principles of greenery on the streets. Sufficient text on climate change and adaptation is included in the supporting text to Policy S10 (Active Travel and Healthy Streets). 2) No change. Folding bikes and scooters were considered too detailed to include within the Plan. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Within the supporting text to Policy S10 (Active Travel and Healthy Streets), should add back in the section regarding anticipated climate change in the City and pollution reduction and mitigation. <p>Response proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Policy requires development to adopt Healthy Streets Approach to improve conditions for safe, convenient, comfortable, inclusive and accessible walking, wheeling and cycling, with measures incorporating climate change adaptation. 																

Heritage and Tall Buildings

Historic Environment

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S11	Historic environment	↑↑↓ (1,2)	↑↑ (3)	-	↑ (4)	-	-	↑ (11)	↑ (6)	-	-	-	↑ (4, 7)	-	↑ (4, 8)	1. Historic environment is a unique selling point for the City. 2. Could restrict redevelopment and intensification of business premises. 3. Provides an attractive place for national and international businesses and visitors, enhancing the local character and distinctiveness of the City.
HE1	Managing change to the historic environment	↑↓ (1,2)	↑↑ (3, 7, 12)	-	↑ (4, 7, 12)	-	-	-	↑ (6)	-	↑ (10)	-	↑ (4, 7)	-	-	4. Local impact – policy applies within the City, seeking to protect, enhance, better reveal, celebrate and positively manage the historic environment, including enhancing public access and enjoyment of the City’s cultural and heritage assets. 5. National and international impact – protects the Outstanding Universal Value of the Tower of London World Heritage Site.
HE2	Ancient Monuments and archaeology	↑↓ (1,2)	↑↑ (3)	-	↑↓ (4, 9)	-	-	-	-	-	-	-	↑ (4, 7)	-	↑ (8)	6. Policy will deliver high quality spaces, which enrich and enhance the settings of heritage assets, as well as protecting and enhancing existing open spaces (i.e. Registered Parks and Gardens). 7. Encourages heritage-led regeneration and allows change of use while preserving heritage assets so as to ensure their continued preservation and
HE3	Setting of the Tower of London World Heritage Site	↑↑↓ (1,2)	↑↑ (3)	-	↑↑ (5)	-	-	-	-	-	↑ (13)	-	-	-	-	

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																<p>contribution to the historic environment.</p> <p>8. Interpretation and publication encourages education.</p> <p>9. Tension between access and protection of historic significance.</p> <p>10. Protecting and reinstating historic pedestrian routes and creating new ones encourages active travel.</p> <p>11. Encourages sensitive sustainable retrofitting of designated and non-designated heritage assets which will mitigate climate change impacts and will reduce carbon emissions.</p> <p>12. Includes the preservation of historical rooftops and safeguarding the setting of assets from elevated viewpoints, contributing to the overall cultural and visual integrity of the City.</p> <p>13. Policy will enhance pedestrian and cycle routes, including signage and wayfinding.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Include reference in the supporting text to Historic England’s guidance on inclusive access to historic buildings and sites.</p> <p>2) References to interpretation should be included improving the impact on education.</p> <p>Response at Regulation 19 Proposed Submission stage:</p> <p>1) Additional wording has been added to Policy HE2 (Ancient Monuments and Archaeology) regarding access to archaeological monuments and remains. Policy S1 (Healthy and Inclusive City) elsewhere in the Plan requires the design and management of buildings, streets and spaces to provide for the access needs of all the City’s communities, including the particular needs of disabled people, older people and people with young children.</p>																

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																<p>2) Additional wording has been added to Policy S11 (Historic Environment) regarding the enhanced <u>experience and interpretation</u> of the City's <u>cultural and heritage assets</u>.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>

Tall Buildings and Protected Views

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S12	Tall buildings	↑↑↑↓↓↓ (1, 2)	↑ (3, 4, 11, 15)	↑ (5, 15)	↑↑↑ (6,7,8)	-	↑ (9)	-	↑ (10)	-	↑ (12)	-	↑ (10)	↑ (9, 11)	-	<p>1. Constraints on development of tall buildings could reduce the City's economic growth potential. Policy S12 encourages tall buildings in areas identified as appropriate, while also identifying areas where tall buildings would be inappropriate, including areas covered by strategic and local views.</p> <p>2. Additional constraints on development of tall buildings could reduce economic growth but the backdrops to St Paul's Cathedral and the Tower of London is already protected by Local View Management Framework views so the impact is likely to be limited.</p> <p>3. Managing the location of tall buildings improves the quality and appearance of the built environment with consideration given to the City's skyline.</p> <p>4. Tall buildings must have regard to the character and amenity of their surroundings, including the relationship with existing and consented tall buildings.</p> <p>5. Policy applies with the Civil Aviation Authority's maximum height limit of tall buildings for the safety of international flights.</p> <p>6. Tall buildings must have regard to the significance of heritage</p>
S13	Protected views	↓↓ (1, 2)	↑ (16)	-	↑↑↑ (6,7, 16)	-	-	-	-	-	-	-	-	-	-	

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																<p>assets and their immediate and wider settings.</p> <p>7. National and international impact – protects outstanding universal value of UNESCO World Heritage Site.</p> <p>8. Integrating development within the existing context, taking into account form, mass, and height, to enhance the overall townscape character.</p> <p>9. Policy seeks to protect the public realm from environmental impacts and ensure safe and comfortable levels of wind shear, daylight and sunlight, solar glare, solar convergence, overshadowing.</p> <p>10. Policy looks to protect existing open spaces while providing new spaces inside and at the top of buildings.</p> <p>11. Promotes accessible building design which will improve the inclusivity of the City.</p> <p>12. Policy seeks to improve public realm, with active frontages at ground level and adequate space between buildings to provide a positive pedestrian experience.</p> <p>13. Consideration of the views of the city designated by other Local Planning Authorities will promote consistency in preserving protected views.</p> <p>14. Achieve exemplar standard of architectural quality, making a</p>

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																<p>positive contribution to the townscape character.</p> <p>15. Active frontages at ground floor level to contribute towards a positive pedestrian experience.</p> <p>16. Views will be protected, with beneficial effects on the townscape and people's experience of the built environment.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan Stage: No recommendations.</p> <p>Response at Regulation 19 Proposed Submission Stage: N/A</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>																

Open Spaces and Green Infrastructure

Open Spaces and Green Infrastructure

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S14	Open spaces and green infrastructure	↑ (1)	↑ (2)	↑↓ (2, 11)	↑↓ (3, 12, 13)	-	↑ (4)	↑ (5)	↑ (6)	↑ (6)	↑ (7)	-	↑ (8)	↑ (9, 10)	-	<p>1. Economic benefits from GI include improving the productivity of workers and making the City a more desirable place for businesses.</p> <p>2. GI and open space enable an attractive public realm with passive surveillance in a dense urban environment.</p> <p>3. There is a potential conflict of GI impacting on the historic fabric of buildings. In addition, if not maintained properly it could impact on protected viewing corridors and vistas.</p> <p>4. Widespread environmental benefits, e.g. air quality, mitigating urban heat island effect, mitigating rainwater run-off and biodiversity enhancement.</p> <p>5. Promotes green roofs, which will help absorb CO₂.</p> <p>6. Protects and enhances open space and biodiversity and urban greening.</p> <p>7. GI and open space will promote active transport through walking and cycling and help reduce the harmful emissions from transport.</p>
OS1	Protection and provision of open spaces	↑ (1)	↑ (2, 26)	↑↓ (2, 11)	↑ (13)	-	-	↑↓ (14)	↑ (6)	↑↓ (14)	↑ (7)	-	↑ (8, 28)	↑ (9)	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																8. Improved opportunities for leisure, which may trigger spontaneous interaction with other members of the public. 9. Evidence demonstrates a positive correlation between GI/open space, good mental and physical health. Promotes well-being and opportunities for leisure.
OS2	Urban greening	↑↓ (1, 15)	↑ (2)	-	↑↓ (16)	-	↑ (4)	↑ (5)	↑ (6)	↑ (6)	-	-	-	↑ (9)	-	10. Public access to open spaces offer an inclusive opportunity for all to experience positive impacts on physical health and mental wellbeing. 11. Increased opportunity for anti-social behaviour. 12. Protection of historic open spaces but not specifically Registered Parks and Gardens. 13. Resists the loss of, and protects, open spaces of

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OS3	Biodiversity	↑↓ (1, 17)	↑ (2)	-	↑↓ (3)	-	↑ (4)	↑ (5)	↑ (6)	↑ (6, 18)	-	-	-	-	↑ (27)	<p>historic interest, e.g. churchyards.</p> <p>14. Includes civic open spaces which may not be green.</p> <p>15. May add to development and maintenance costs.</p> <p>16. Uncertain what impact greening would have on character of historic buildings.</p> <p>17. Potential conflict of SINCs impacting on economic and business growth of areas of City e.g. if extended to green roofs and green walls.</p>
OS4	Biodiversity Net Gain	↑ (1)	-	-	-	-	↑ (4)	-	↑ (6)	↑ (6, 19)	-	-	-	↑ (9)	-	<p>18. The inclusion of new and upgraded SINCs (which will formally take effect upon adoption of the Local Plan) will enhance biodiversity and provide habitats that benefit the City's target species.</p> <p>19. Promotes the conservation and enhancement of biodiversity by maximising on-site biodiversity, prioritising on-site habitat creation, and considering off-site options only as a last resort for</p>

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OS5	Trees	↑ (1, 20)	↑ (21)	-	↑↓ (22)	-	↑ (23)	↑ (24)	↑ (24, 25)	↑ (25)	-	-	-	↑ (9)	-	<p>achieving Biodiversity Net Gain. All major developments must achieve a minimum of three biodiversity units per hectare.</p> <p>20. Trees make the city a more desirable place for businesses to choose to locate.</p> <p>21. Trees enable an attractive public realm, enhance visual amenity and soften the impact of buildings and hard surfaces within a dense urban environment.</p> <p>22. There is a potential conflict of trees impinging on protected viewing corridors and vistas. They may affect the setting of heritage assets, either in a beneficial or an adverse way depending on the site location, the nature of the heritage asset, tree species etc.</p> <p>23. Trees can contribute to improved air quality by trapping pollutants. They can absorb rainwater, reducing the risk of flooding, and act as a filter against noise and light pollution.</p> <p>24. Mitigate against effects of climate change – e.g. providing shade and shelter from sun, rain and wind, ameliorating the urban heat</p>

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																<p>island effect and reducing vulnerability to flooding.</p> <p>25. Trees provide an important habitat within a dense urban environment, supporting biodiversity and enhancing the value of open spaces.</p> <p>26. The design of open spaces will consider how seating, planting, lighting, and routes are designed to ensure that open spaces are free, accessible, welcoming, and inclusive.</p> <p>27. Promotes opportunities such as citizen science and school projects and records collected by local voluntary individuals and groups to a significant contribution in supporting biodiversity and raises the profile of species and habitats within the City (supporting text).</p> <p>28. Improvements to accessibility and pedestrian routes sought.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <ol style="list-style-type: none"> 1) More information should be included in the supporting text to indicate there is an opportunity to include educational promotion/interpretive boards, e.g. food growing. 2) Reference could be made to small areas of soft landscaping, e.g. green walls, green gyms, small scale food growing 3) More information on blue infrastructure should be included 4) Wording relating to multiple benefits could be changed to say environment and economic benefits. Eco Systems services. 5) Reference should be made to the potential for informal play in open spaces and recreational spaces on green roofs <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) Wording has been added to the supporting text to Policy S1 (Healthy and Inclusive City) which indicates that the provision of land or spaces for food growing can help promote a more active lifestyle, improve social cohesion and mental and physical health and well-being. 2) No further change. Reference to the benefits of small areas of soft landscaping had already been included in the supporting text to Policy OS2 (City Greening). 3) Blue infrastructure is already referred to in the supporting text to Policies OS2 (City Greening) and CR2 (Flood Risk). Wording has been added to the Glossary including reference to Biodiverse green roofs. 4) No further change. The original reference to multiple benefits had already been changed in the Draft Plan to specify the types of benefits that arise from green infrastructure. 5) Wording has been added to the supporting text to Policy HIC8 (Sport and recreation) which notes that open spaces and publicly accessible rooftops can provide valuable formal or informal sports and recreational facilities in the densely built City environment. It goes on to indicate how the use of multi-purpose structures in outdoor spaces can facilitate physical activities. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Reference and mitigation recommendations to be provided in relation to heritage assets (e.g. Registered Parks and Gardens), particularly in supporting text of S14: Open Spaces and Green Infrastructure, and OS1: Protection and Provision of Open Spaces <p>Response at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Policy HE1: Managing change to the historic environment requires development to preserve and where possible enhance and better reveal the significance, character and appearance of the City's registered historic parks, gardens and open spaces and their settings and views from and towards these spaces. 																

Climate Resilience

Climate Resilience and Flood Risk

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S15	Climate resilience and flood risk	↑ (1)	↑ (2)	↑ (2, 9)	↕ (7,8)	-	↑ (3)	↑ (5, 10, 13)	↕ (7)	↑ (6)	-	↑ (5)	↑ (5)	↑ (3)	-	1. Climate resilience will be key as other financial centres experience climate extremes. 2. Resilience and flood measures will keep the public realm and built environment safe and comfortable.
CR1	Overheating and urban heat island effect	↑ (1)	↑ (2)	-	-	-	↑ (3, 12)	↑ (5, 11, 12)	↑ (7)	↑ (6)	-	↑ (5)	↑ (5)	↑ (3)	-	3. Limits overheating risk. 4. Flood mitigation measures like Sustainable Drainage Systems will improve water quality and reduce sewer overflow flooding.
CR2	Flood risk	↑ (1)	↑ (2)	↑ (9)	↕ (7,8)	-	↑ (4)	↑ (5)	-	-	-	↑ (5)	↑ (5)	-	-	5. Reduces overheating and provides flood protection for built environment
CR3	Sustainable Drainage Systems (SuDS)	↑ (1)	↑ (2)	-	↑ (8, 14)	-	↑ (4)	↑ (5)	↑ (15)	↑ (6)	-	↑ (5)	↑ (5)	-	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
CR4	Flood protection and flood defences	↑ 1)	↕ (7)	↑ (9)	↕ (7,8)	-	↑ (4)	↑ (5)	-	-	-	↑ (5)	↑ (5)	-	-	including housing and public realm. 6. Urban greenings an things like green roofs and Sustainable Drainage Systems can help improve biodiversity potential. 7. Depends on design of climate resilience and flood defence measures especially on the Thames riverside and Registered Parks and Gardens. 8. Protects heritage assets from flooding. 9. Improves safety from flooding. 10. Contributes towards making the City more resilient and integrating wider climate resilience measures in the City. 11. Promotes minimal reliance on energy intensive

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																<p>cooling systems which will help reduce the carbon footprint associated with energy production.</p> <p>12. Building design will seek to minimise contribution to the heat island effect, helping to combat the overall effects of climate change.</p> <p>13. Safeguards and enhances flood defence structures to maintain protection from sea level rise.</p> <p>14. Sustainable Drainage Systems must take account of the City's archaeological and other heritage assets.</p> <p>15. Sustainable Drainage Systems often comprise open space.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage: 1) Include reference to taking account of other historic assets, not just archaeology, in SuDS policy (CR3).</p> <p>Response at Regulation 19 Proposed Submission stage:</p>																

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																<p>5) No further change. Policy CR3 (SuDS) had already been amended in the Draft Plan to indicate that SuDS designs must take account of the City's archaeological and other heritage assets.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>1) More detail could be provided to the point regarding building design in Policy CR1: Overheating and Urban Heat Island Effect, to show how building design will minimise contribute to the heat island effect.</p> <p>2) Policy CR2: Flood risk could make specific reference to Sustainable Drainage Systems.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>1) Policy CR1 requires building design to minimise any contribution to the urban heat island effect. Added wording to the supporting text explaining how design of buildings could reduce energy demands from cooling infrastructure, making them more resilient to higher temperatures. Measures such as urban greening and design features that provide shade and shelter can have a positive impact on or near the building, minimising the urban heat island effect (see Policy OS2).</p> <p>2) Supporting text in Policy CR2 draws reference to the design and mitigation measures such as sustainable drainage systems to provide protection from flooding for properties beyond the site boundaries.</p>

Circular Economy and Waste

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S16	Circular economy and waste	↑↑ (1)	↑ (3)	↑↑ (5)	-	↑↑ (1, 2)	↑↑ (4, 5)	↑↑ (5, 6)	-	-	↑↑ (5, 6)	-	-	-	-	<p>1. The Corporation will support businesses and residents in moving towards a Zero Waste City. Waste and resources planning provides environment for responsible businesses to thrive.</p> <p>2. Space for waste reduces space for other uses but waste management on site or in the City eliminates need for transfer.</p> <p>3. Positive waste planning keeps public realm and built environment clear of unsightly waste.</p> <p>4. Ensures waste sites are built in suitable locations with appropriate environmental safeguards and carbon considerations.</p>
CE1	Sustainable waste facilities and transport	↑↓ (1,8)	↑↑ (3, 14)	↑↑ (5, 12)	↑ (3, 9)	↑↑ (5, 10)	↑↑ (5)	↑↑ (5, 7, 10)	-	-	↑↑ (5, 12, 16)	↑ (13)	-	↑↓ (5, 7, 17)	-	<p>5. Effective waste planning will reduce road miles for waste with consequential positive impacts on air quality, road safety and health.</p> <p>6. Co-operation with other waste planning authorities supports provision of waste facilities in suitable locations to deal with City's waste.</p> <p>7. Waste apportionment and sustainable river / rail transport</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
CE2	New waste management sites	↑↓ (2)	↑ (3)	↑ (18)	-	↑↑ (2)	↑↓ (4, 11, 19)	↑ (4)	-	-	↑↑ (5)	-	-	↑↓ (15, 19)	-	reduces overall emissions associated with waste transport benefiting health. 8. Short-term cost but long-term benefit as we move to green economy. 9. Potential impact on historic assets of incorporating waste storage within buildings, although policy stipulates that in cases where historical assets may be affected, waste facilities should be situated on-site near the highway (supporting text). 10. Operational waste requirements to contribute to BREEAM requirements for waste credits (supporting text). 11. Could result in noise or air pollution if not sensitively managed. 12. Optimum use of waste vehicle capacity and low emission vehicles will lead to safer streets. 13. Well-designed waste storage improves residential amenity. 14. Sustainable transport improves public realm within and beyond City. 15. Waste management facilities can have negative health impacts on the immediate locality through air

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																<p>quality impacts, noise and odours if not effectively managed.</p> <p>16. Provision of a single waste collection facility in major development will promote decreased traffic congestion, and lower carbon emissions associated with transportation.</p> <p>17. Provision of a single waste collection facility in major development could however, result in overflow and unsanitary conditions such as overflow, and risk of attracting pests.</p> <p>18. Development will be resilient to natural and man-made safety and security challenges.</p> <p>19. Noise-sensitive development within close proximity of Walbrook Wharf will be resisted.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Ensure that designs of waste management facilities, both on or off-site, occupy the minimum necessary footprint, and are sited so that they do not cause noise disturbance to neighbouring uses. Environmental permits may be required to ensure suitable management of waste treatment facilities.</p> <p>2) Include references in the supporting text to impacts on neighbouring occupants</p> <p>Response at Regulation 19 Proposed Submission stage:</p> <p>1) These references were already incorporated into Policy CE1 (Zero Waste City) and CE3 (New Waste Management Sites) and their supporting text in the Draft Plan. Land values in the City mean that waste management facilities are likely to occupy the minimum necessary footprint in any event.</p> <p>2) The supporting text to Policy CE1 (Zero Waste City) has been strengthened to avoid adverse local impacts.</p>																

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<p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>																

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

The Temples and Thames Policy Area

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
TP1	The Temples	-	↑ (2)	-	↑ (2, 3)	-	-	-	↑ (2)	↑ (2)	-	-	↑ (2)	-	↑↑ (1)	<p>1. Policy supports the Inner and Middle Temples as centres for education, training, and facilities for barristers and students.</p> <p>2. Promotes opportunities to enhance the historic character of the Temples through additional greening and open spaces.</p> <p>3. Alterations and additions to buildings in Temple will respect the unique historic and architectural character of the area (supporting text).</p> <p>4. The River Thames is a tourism and recreational asset. Ensures that buildings and spaces on or near the riverside contribute to sustainable economic growth.</p> <p>5. Enhances pedestrian permeability and accessibility and supports the aims of the City of London Riverside Strategy and Riverside Walk Enhancement Strategy.</p> <p>6. Maximises opportunities for public open space along the riverfront and improvements to the public realm.</p> <p>7. Potential increase in people visiting the area could result in an increase in anti-social behaviour.</p>
S17	Thames Policy Area	↑↑ (4, 17)	↑↑ (5, 6)	↑ (7, 10, 15)	↑ (8)	↑↑ (9, 10)	↑↑ (10)	↑ (11)	↑ (6, 12,)	↑↑ (12, 13)	↓ (14, 16)	-	↑ (5)	-	-	

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>8. Policy safeguards heritage assets, which enhance the character of the riverside.</p> <p>9. Retains Walbrook Wharf for waterborne freight traffic, including waste use and freight consolidation. Encourages the use of the Thames for the transport of construction and deconstruction materials and waste.</p> <p>10. Policy safeguards land for the Thames Tideway Tunnel project, which would result in significant improvements to prevent raw sewerage from entering the Thames.</p> <p>11. Thames Tideway Tunnel would capture and divert storm overflows.</p> <p>12. Makes provision for publicly accessible roof terraces, where they do not impact adversely on the amenity of occupiers or nearby residents.</p> <p>13. Policy protects Metropolitan SINC and seeks opportunities to create/enhance riverside habitats. More visitors could disturb some wildlife but a net positive impact.</p> <p>14. Policy aims to retain Blackfriars Pier, and access to Tower Pier, and encourages the reinstatement of Swan Lane Pier and use these facilities for river transport.</p>

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																<p>15. Requirement for new development to provide active frontages.</p> <p>16. Walking will be encouraged by protecting and enhancing permanent public access along the riverside walk, and widening of the riverside walk.</p> <p>17. Promotes office-led commercial development, which will contribute towards economic growth.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan Stage:</p> <ol style="list-style-type: none"> 1) Crime is not addressed in the policy but is covered in other Local Plan policies for the whole City. 2) Add heritage assets to Policy. 3) See Flood Risk Policy for further information. 4) Protect existing residential? <p>Response at Regulation 19 Proposed Submission Stage:</p> <ol style="list-style-type: none"> 1) No change. Policies in the Safe and Secure City section of the Plan address crime and security. There are no specific issues on the riverside that require an area-based policy. 2) No further change. Reference to safeguarding heritage assets had already been added in the Draft Plan. 3) Flood risk is covered in Policy S15 (Climate Resilience and Flood Risk). However, wording has been added to the supporting text of Policy S17 (Thames Policy Area) highlighting the fact that the City Corporation is undertaking research into the practical implications of raising the City's flood defences in line with the Thames Estuary 2100 Plan, which addressed flood risk. 4) No change. Policy HS2 (Loss of Housing) sets out the policy approach towards the loss of existing housing and there is no reason to adopt a specific policy in relation to housing along the riverside. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Make reference to specific transport schemes in relation to the supporting text for Policy S17: Thames Policy Area. <p>Response at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) The Plan is considered to contain a sufficient number of references to specific transport schemes. <p>- Improving access to the River Thames by enhancing north-south routes and the widening of the riverside walk.</p>																

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																<ul style="list-style-type: none"> - Encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste. - Retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided.

Blackfriars Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S18	Blackfriars	↑ (1)	↑ (2)	↑ (3, 6, 11)	↑ (4, 12)	↑↑↓↓ (5)	↑↑ (6)	↓ (7)	↑ (2, 9)	↑ (2, 9)	↑ (8, 10)	-	↑ (2, 9)	↑ (9)	-	<p>1. The comprehensive redevelopment of this area to provide new high-quality office and commercial accommodation would support economic growth.</p> <p>2. Policy seeks to enhance pedestrian permeability and accessibility and create a high-quality new public realm with urban greening and publicly accessible roof terraces and spaces.</p> <p>3. Potential increase in people visiting the area could result in an increase in anti-social behaviour.</p> <p>4. Uncertain as effects on the historic environment are dependent on the design of the redevelopment.</p> <p>5. Likely increase in waste due to more activity / construction in area but potential to use nearby waste transfer station and river to transport development waste.</p> <p>6. Policy incorporates implementation of Thames Tideway Tunnel project, which would result in significant improvements to</p>

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																<p>prevent raw sewerage from entering the Thames.</p> <p>7. Thames Tideway Tunnel would capture and divert storm overflows. Policy aims to identify pollution reduction measures at locations along the river but would be hard to alleviate due to current road layout.</p> <p>8. Policy proposes improved accessibility, especially to and along the riverside, including appropriate widening of the Riverside Walk, improvements to Blackfriars Underpass and the provision of new and improved links across Queen Victoria Street and Upper Thames Street.</p> <p>9. Blackfriars Bridge foreshore (Bazalgette Embankment) will include a civic space, green terraces, and a venue for outdoor events, sports, leisure, and recreation, alongside public artwork (supporting text).</p> <p>10. Policy seeks to provide a new entrance to the east side of Blackfriars station for improved pedestrian connectivity to the riverfront.</p> <p>11. Active frontages at ground floor level.</p>

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																12. Seeks to preserve, enhance and celebrate the area's heritage and historic assets, giving careful consideration to protected views.
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <ol style="list-style-type: none"> 1) Crime is not addressed in the policy but is covered in other Local Plan policies for the whole City. 2) See Thames Policy Area and Waste Management policies for further information. <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) No change. Policies in the Safe and Secure City section of the Plan address crime and security. There are no specific issues in Blackfriars that require an area-based policy approach. 2) No change. The management of waste is addressed in the Circular Economy and Waste section of the Plan. Mitigation relating to the use of the river for freight consolidation and the transport of waste is included in Policy S17 (Thames Policy Area). <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>																

Pool of London Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S19	Pool of London	↑ (1)	↑ (2, 11)	↓ (2, 3)	↑↑↑ (4)	↑↑↓ (5)	↓ (6)	↓ (6)	↑ (11)	↑ (2)	↑ (7, 8)	↓ (9)	↑ (10)	↑ (10, 11)	-	<p>1. The substantial redevelopment of this area to provide new high-quality office and commercial accommodation would support economic growth.</p> <p>2. Policy seeks to enhance pedestrian permeability and accessibility and create a high-quality new public realm with active frontages and urban greening.</p> <p>3. Potential increase in people visiting the area could result in an increase in anti-social behaviour.</p> <p>4. Preserving and enhancing the area's historic environment, including protected views, and optimising the use of heritage assets and the spaces around them in ways that help to better reveal their heritage.</p> <p>5. Likely increase in waste due to more activity / construction in area but potential to use nearby waste transfer station and river to transport development waste.</p> <p>6. Policy aims to identify pollution reduction measures</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>at locations along the river but would be hard to alleviate due to current road layout.</p> <p>7. Improved transport connections and pedestrian links are planned to enhance connectivity, especially across Lower Thames Street and along the Riverside Walk, including increased permeability to the north of the Riverside Walk.</p> <p>8. Redevelopment and refurbishment offer the opportunity to improve servicing arrangements.</p> <p>9. Retail and night-time uses may impact on existing residential amenity.</p> <p>10. Policy encourages the provision of recreation, cultural events, arts and play in public spaces along the riverside.</p> <p>11. Policy seeks to make the riverfront more vibrant and accessible, with increased quantity and quality of public open space along the riverfront.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Crime is not addressed in the policy but is covered in other Local Plan policies for the whole City.</p> <p>2) See Thames Policy Area and Waste Management policies for further information</p>																

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
<p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) No change. Policies in the Safe and Secure City section of the Plan address crime and security. There are no specific issues in the Pool of London that require an area-based policy approach. 2) No change. The management of waste is addressed in the Circular Economy and Waste section of the Plan. Mitigation relating to the use of the river for freight consolidation and the transport of waste is included in Policy S17 (Thames Policy Area). <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Make reference to measures to minimise flood risk in Pool of London. <p>Response at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Supporting text highlights that minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. 																

Aldgate, Tower and Portsoken Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S20	Aldgate, Tower and Portsoken	↑ (1, 6, 11, 12)	↑ (4)	↓ (2)	↑↑↑ (8)	↓ (3)	↓ (2)	↓ (2)	↑ (4)	↑ (4)	↑↓ (5, 9)	↑ (1, 7)	↑ (7)	↑ (1, 7, 9)	↑ (10)	<p>1. Policy promotes a greater mix of development, including commercial, educational, and hotels alongside existing residential development, whilst also supporting residential development in appropriate locations.</p> <p>2. Depends on design and implementation.</p> <p>3. Increased development and visitor numbers will generate increased levels of construction / operational waste.</p> <p>4. Enhanced public realm and accessible open spaces will include opportunities for urban greening.</p> <p>5. Increased worker density and visitors places more strain on public transport and streets but development within Aldgate and Tower makes efficient use of existing transport networks.</p> <p>6. Improved training and education may benefit local businesses.</p> <p>7. Supports health, cultural and community use development to assist in the area's renewal, which help support residents' needs.</p> <p>8. Indicates that public realm works and development proposals in the area should seek to enhance the immediate surroundings of the Tower of London World Heritage Site (supporting text).</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>9. Policy seeks to improve to transport connections and pedestrian connectivity, particularly in relation to the Mansell Street Estate, and the closed Aldgate Gyratory.</p> <p>10. Seeks to maximise training, education and employment opportunities for residents.</p> <p>11. Policy will facilitate the regeneration of the Mansell Street Estate and adjacent sites, making the area more attractive to all.</p> <p>12. Enhancing Petticoat Lane Market and encouraging cultural events.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>9) These issues are not addressed in the policy but are addressed in Local Plan policies for the whole City (crime reduction, heritage assets, waste management, environmental protection, climate mitigation and resilience, open spaces and biodiversity).</p> <p>Response at Regulation 19 Proposed Submission stage:</p> <p>9) No change. These issues are addressed in a range of policies elsewhere in the Plan and are not specific to the Aldgate and Tower area.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>N/A</p>																

City Cluster Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S21	City Cluster	↑↑↑ (1)	↑ (2, 9, 11)	↑ (3)	↑ (4, 11, 12)	↑ (5)	↑↓ (6)	↑↓ (7)	↑ (2, 9)	-	↑↓ (8)	-	↑ (9, 11)	↑ (10)	↑ (10)	<p>1. Policy supports development of significant employment floorspace, as well as the construction of new tall buildings. This area is the financial heart of the City and many firms have an international workforce.</p> <p>2. Requirement for high quality design but intensification of development will put increased stress upon the public realm and open spaces.</p> <p>3. Policy places an emphasis on area-wide security measures and estate management to ensure the safety of workers and visitors.</p> <p>4. Policy seeks to place tall buildings on appropriate sites, ensuring that they positively contribute to the City's skyline, preserve heritage assets and their setting, but there could be some impacts given the scale of development.</p> <p>5. Significant level of development activity will generate increased construction and operational waste. Supporting text does state that this concentration of activity will require specialised approaches to freight and servicing, including the use of consolidation.</p> <p>6. Tall buildings can have impacts on the local environment. Policy seeks to manage some of these environmental impacts, namely the microclimate. The</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>City Corporation has published microclimate guidelines.</p> <p>7. Promotes sustainable buildings but office development will increase energy demands.</p> <p>8. Increased density leads to greater pressures on roads and pavements. Policy seeks to mitigate this through prioritising pedestrian movement and connectivity, through re-allocation of road space during the daytime and creating new pedestrian routes through – and improving the accessibility of – Leadenhall Market.</p> <p>9. Promotes vibrant cultural activities and amenities, integrating open spaces, roof gardens, and leisure destinations to enhance the urban experience in the City.</p> <p>10. Improving access to health and education facilities is promoted.</p> <p>11. Encourages culture, retail, food and beverage, and complementary uses through extending Leadenhall Market into a seven day-week destination, although this may have an impact on the amenity of residents. The historic character of the area will be preserved and enhanced.</p> <p>12. Aims to safeguard heritage assets and conservation areas, specifically focusing on Bevis Marks Synagogue and Leadenhall Market, to guarantee the preservation and enhancement of their historical character and appearance.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
<p>Mitigation proposed at Regulation 18 Draft Plan stage: No recommendations.</p> <p>Response at Regulation 19 Proposed Submission stage: N/A</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage 1) Policy could go further in terms of requiring high environmental standards and sustainable building design and construction.</p> <p>Response at Regulation 19 Revised Proposed Submission stage 1) Policy recognises the need to increasing provision of attractive world class buildings that are sustainable.</p>																

Fleet Street and Ludgate Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S22	Fleet Street and Ludgate	↑ (1, 6, 10, 11)	↑ (3, 4)	↑↑ (2, 3, 13)	↑↑↑ (4,5)	-	-	-	↑ (7)	↑ (7)	↑↑↓ (8)	↑ (9, 12)	-	-	↑ (6)	<p>1. Development of new court facilities will strengthen the legal cluster in the area and improved retailing would benefit workers and visitors.</p> <p>2. The delivery of new court buildings and police facilities at Salisbury Square will provide a facility to tackle cybercrime, fraud, and economic crime in London.</p> <p>3. Seeks to improve the capacity, accessibility and safety of the public realm.</p> <p>4. Protects and enhances character and appearance of the historic processional route.</p> <p>5. Seeks to protect and enhance the historic view of St Paul's from Fleet Street and to ensure development does not impact on the Conservation Area and heritage assets.</p> <p>6. Seeks to provide an enhanced cultural offer in the area, informed by its rich history and connection to the legal, publishing, and newspaper industries, which will attract tourism, which in turn can boost the local economy.</p> <p>7. Encourages additional greening on streets and open spaces and the greening of buildings.</p> <p>8. Junction improvements will address transport issues, particularly at Ludgate Circus. Policy promotes more spaces for seating in the area,</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>and improvements to pavements, which will ease pedestrian flows, but this could impact on vehicular movement including buses.</p> <p>9. Extension of retail activity into the evening and weekends would improve services for residents in this area but may have an impact on their amenity.</p> <p>10. Encourages office-led redevelopments, including for creative, start-up and SME businesses, which will enhance the area's heritage and culture, and benefit workers and visitors.</p> <p>11. Policy allows tall building development on appropriate sites within the defined tall building area identified on the Policies Map. This will encourage office development in appropriate locations, facilitating sustainable economic development.</p> <p>12. Seeks to reinforce residential clusters ensuring a high-quality of residential amenity.</p> <p>13. Seeks to improve safety in the courts and alleyways that lead off Fleet Street and Ludgate Hill and churchyards that are located in the area, by implementing enhanced lighting and activation measures.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage: No recommendations.</p> <p>Response at Regulation 19 Proposed Submission stage:</p>																

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
N/A	<p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>															

Smithfield and Barbican Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S23	Smithfield and Barbican	↑↑ (1, 2, 13)	↑ (3, 13)	↕ (4)	↑↑ (5)	↕ (6)	↑ (7, 8)	↑ (7, 21)	↑ (8)	↑ (8)	↑ (9)	↑↓ (10, 20)	↑↑↑ (11, 12, 13)	-	-	<p>1. Promotes culture-led mixed-use development, which will attract visitors to the area with beneficial effects on the economy.</p> <p>2. Supports the provision of additional hotels in appropriate locations, where they are complementary to the City's business role.</p>
S24	Smithfield	↑↑ (18)	↑ (3, 19)	-	↑ (5, 15)	↕ (6)	-	-	-	-	↑ (9)	↕ (10, 17)	↑↑↑ (18)	↑↑ (16)	↑↑ (16)	<p>3. Seeks to enhance the character of the area through sensitive change and public realm improvements.</p> <p>4. Culture-led mixed-use development would attract more visitors, and therefore will improve surveillance but could result in more antisocial behaviour.</p> <p>5. Heritage assets would be enhanced through protection and sensitive re-use.</p> <p>6. Increased number of visitors and activity likely to generate more</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>waste, although depends on management and street cleaning arrangements.</p> <p>7. Supports improvements to air quality by encouraging more active transport modes, which will help reduce associated emissions.</p> <p>8. Increased green infrastructure is proposed in the public realm and on buildings.</p> <p>9. Policy supports traffic management measures and improvements to pedestrian and cycle routes. Pedestrian permeability will be improved through Smithfield Market, Golden Lane and Barbican, in addition to/from the Elizabeth Line.</p> <p>10. Potential for conflict between residential amenity and the late evening, seven-day a week character of the area.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>11. This area is recognised in London Plan as a strategic cultural area and seeks to further develop the cultural offer.</p> <p>12. Provides opportunities for social interaction.</p> <p>13. Policy encourages provision of premises suitable for start-ups, digital and creative industries, and cultural entities, including temporary use of vacant premises.</p> <p>14. Requires noise mitigation and other measures to protect amenity.</p> <p>15. The three wholesale markets will co-locate in a new location to release the existing Smithfield Market for alternative use. Policy requires a world class design solution with a mix of uses appropriate to its sensitive heritage character.</p> <p>16. Supports the continued presence of</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>St Barts and recognises its importance as a renowned teaching hospital and centre for excellence.</p> <p>17. Policy supports and enables residential development in appropriate locations, and also resits residential development adjacent to Smithfield Market (current site) or the future Museum of London to minimise adverse impacts on residential amenity.</p> <p>18. Supports the establishment of Smithfield as a leisure destination, and promotes a retail and leisure economy that contributes to the changing uses of the area.</p> <p>19. Promotes the creation of new and enhanced public realm across Smithfield to accommodate cultural activity.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>20. Supports and enables residential development in appropriate locations.</p> <p>21. Supports continued connections to the Citigen district heating and cooling network.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <p>1) Crime is not addressed in the policy, but possible increased crime is addressed in Local Plan policies for the whole City</p> <p>2) Waste management is not addressed in the policy, but waste management is addressed in Local Plan policies for the whole City</p> <p>3) The protection of residents' facilities is dealt with in depth in the Local Plan</p> <p>Response at Regulation 19 Proposed Submission stage</p> <p>1) No change. Policies in the Safe and Secure City section of the Plan address crime and security. There is no specific requirement for an area-based policy approach to crime and security in Smithfield and Barbican.</p> <p>2) No change. The management of waste is addressed in the Circular Economy and Waste section of the Plan. There is no specific requirement for an area-based policy approach to waste management in Smithfield and Barbican.</p> <p>3) No change. While residents' facilities are covered in other sections of the Plan (primarily Housing and Healthy and Inclusive City), Policy SB1 (Culture Mile Impacts) is intended to address the impacts of Culture Mile, including potential impacts on residential amenity.</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <p>N/A</p> <p>Response at Regulation 19 Revised Proposed Submission stage</p> <p>No recommendations.</p>																

Liverpool Street Key Area of Change

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S25	Liverpool Street	↑ (1)	↑ (2,9,10)	↑↓ (3,9)	↑ (4)	↓ (5)	-	-	↑ (6)	↑ (6)	↑↑ (7,10)	-	-	↑ (7)	-	<p>1. Increased development that provides opportunities for collaboration between businesses in this area, Tech City, the creative sector and educational institutions, and the encouragement of flexible workspace will enable increased economic growth, retail sales and further development of the business and creative eco-systems.</p> <p>2. Policy supports the increased permeability of the area and an improved public realm.</p> <p>3. Policy seeks to increase the capacity of pavements, which will improve the safety of pedestrians. However, the increase in leisure activity could increase antisocial behaviour.</p> <p>4. Depends on implementation.</p> <p>5. Increased development will generate increased levels of construction / operational waste.</p> <p>6. Environmental enhancements provide opportunities for new green open spaces, urban greening, and biodiversity improvements.</p> <p>7. New and enhanced walking routes will improve pedestrian movement and health opportunities. Area will benefit from the Elizabeth Line and policy seeks improvements to Liverpool Street Station.</p>

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
																<p>8. Promotes the area as a gateway to the City through with improved wayfinding and signposting. This will provide a welcoming visitor experience.</p> <p>9. The provision of active frontages at ground level will contribute to an attractive public realm, as well as provide passive surveillance.</p> <p>10. Promotes an enhanced user experience around the bus station through provision of seating, legible wayfinding and ease of access.</p>
<p>Mitigation proposed at Regulation 18 Draft Plan stage:</p> <ol style="list-style-type: none"> 1) Work with licensing and City Police to mitigate potential problems of an enhanced retail/ leisure offer into the evenings and weekends. 2) Reduction of single use plastics and greater awareness of the circular economy could mitigate some of the waste issues. The new waste contract would need to take account of the changes. <p>Response at Regulation 19 Proposed Submission stage:</p> <ol style="list-style-type: none"> 1) Other Plan policies such as CV4 (Evening and Night-Time Economy) and IN2 (Dispersal Routes) address these issues. Wording has been added to the supporting text to Policy IN2 (Infrastructure Capacity) highlighting the importance of early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, to help ensure that measures contained in Management Statements at the planning stage are appropriate to local circumstances. 2) Other Plan policies in the Circular Economy and Waste section address these issues. A requirement has been added for Circular Economy Statements to be submitted for all Major and EIA development. <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Add reference or mention of how construction / operational waste will be mitigated. <p>Response at Regulation 19 Revised Proposed Submission stage</p> <ol style="list-style-type: none"> 1) Covered in relevant policies in the Plan. 																

Implementation

Planning Contributions

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
S27	Planning contributions	↑↑↑ (1)	↑ (2)	↑ (3)	-	-	-	↑ (4)	-	-	↑↑ (5, 8, 9)	↑↑ (6)	↑ (2)	-	↑↑ (7)	<ol style="list-style-type: none"> 1. Enables provision of infrastructure to support the global business centre. 2. Provides funding to deliver public realm improvement and cultural provision. 3. Provides funding to deliver security upgrades. 4. Provides mechanism for carbon offsetting contributions. 5. Provides for collection of Mayoral CIL and s106 to part fund Crossrail and Crossrail 2. 6. Provides contributions for affordable housing from housing and commercial development including delivery of affordable housing outside the City. 7. Requires contributions towards skills, job brokerage, training and for local procurement to support residents and businesses including outside the City. 8. Provides funding for highways enhancement, including commuted sums for maintenance. 9. Provision of infrastructure to support implementation of the City's Transport Strategy.
PC1	Viability assessments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Mitigation proposed at Regulation 18 Draft Plan stage:

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation and resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Comments
		<p>No specific mitigation. Office, Housing, Design and Health and Inclusive City policies provide detail on thresholds for planning obligations requirements and how obligations will be used to support Plan delivery.</p> <p>Response at Regulation 19 Proposed Submission stage: N/A</p> <p>Mitigation proposed at Regulation 19 Revised Proposed Submission stage No recommendations.</p> <p>Response at Regulation 19 Revised Proposed Submission stage N/A</p>														