

City of London

Appendix 6

IIA Assessments (Proposed Submission Draft City Plan 2036)

Local Plan Review

Environmental Report

City Plan 2036 Proposed Submission Draft

March 2021



Appendix 6 IIA Assessments – Proposed Submission City Plan 2036 policies

Assessments have been carried out on each of the policies in the City Plan 2036. The assessments identified areas where policies could be improved to align with the IIA objectives.

Table 1: IIA Assessment Framework

	Impact of implementing policy	Response to IIA 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
N	Negligible effect	N

↑	One arrow – local impact within the City
↑↑	Two arrows – regional impact within the rest of London
↑↑↑	Three Arrows – national or international impact beyond London

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

Flourishing Society

Healthy & Inclusive City

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
S1	Healthy and inclusive City	↑ (1)	↑ (2)	N	N	N	↑ (3)	↑ (4)	↑ (5, 6)	↑ (4)	↑ (2)	↑ (6)	↑ (7)	↑↑ (6, 8)	↑ (6)	↑↑ (9, 10)

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
HL1	Inclusive buildings and spaces	↑ (1)	↑ (2)	N	↑ (11)	N	N	N	↑ (5)	N	↑ (2, 12)	↑ (6)	↑ (13)	↑↑ (14)	↑↑ (15)	↑↑ (9)
HL2	Air quality	↑ (16)	↑ (2)	N	↑ (17)	N	↑↑ (3)	↑ (18)	↑ (5)	↑ (4)	↑↑ (19)	↑ (6)	N	↑↑ (8, 20)	↑ (6)	↑ (21)

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
HL3	Noise and light pollution	↑ (1)	↑ (2)	N	N	N	↑ (3)	↑ (22)	↑ (2)	↑ (23)	N	↑ (6)	N	↑ (24)	↑ (6)	↑ (9)
HL4	Contaminated land and water quality	N	↑ (2)	N	N	N	↑ (3)	N	↑ (2)	↑ (25)	N	N	N	↑ (25)	N	N

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
HL5	Location and protection of social and community facilities	↑↓ (26)	N	N	↑ (27)	N	N	N	N	N	N	↑ (6)	↑ (7)	N	↑ (28)	↑ (29)
HL6	Public toilets	↑↓ (30)	N	↑ (31)	N	N	N	N	↑ (32)	N	N	N	N	↑ (32)	N	↑ (32)

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
HL7	Sport and recreation	↕ (26)	↑ (33)	↑ (33)	N	N	N	N	↕ (34)	↕ (34)	N	↑ (6)	↑ (6)	↑ (35)	↑ (6)	↑ (9)
HL8	Play areas and facilities	↕ (36)	↑ (33)	↑ (33)	N	N	N	N	↕ (34)	↕ (34)	N	↑ (37)	↑ (37)	↑ (38)	↑ (38)	↑ (33)

Policy Number	Policy	Economic growth	Built environment & public realm	Safe environment & crime reduction	Heritage assets	Waste management	Environmental protection	Climate mitigation & resilience	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
HL9	Health Impact Assessment (HIA)	↕ (39)	↑ (40)	N	N	↑ (41)	N	N	N	↑ (42)	N	N	N	↕ (43)	N	↑ (44)

Comments:

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 quality if air, noise, light, water and soil pollution is reduced.
3. The environment will be improved with less pollution (including from deconstruction waste).
4. Greening open spaces and the public realm to improve air quality will help mitigate the effect of the urban heat island and improve biodiversity.
5. Creating healthier and inclusive spaces with appropriate facilities will improve people's enjoyment of open spaces and public realm for workers, residents and visitors.
6. Residents, students and children will benefit from healthier and inclusive buildings that are flexible to changing health and wellbeing requirements (supporting text), less pollution, open spaces with recreational facilities, and improvements to health, education and nursery / childcare provision
7. Policy promotes the protection and enhancement of social and community facilities
8. A large healthy workforce living all over the south-east will have regional benefits. Policy supports the retention of public healthcare facilities, in addition to further provision of public and private health facilities. St Bart's Hospital will be protected.
9. Healthier and inclusive spaces will encourage greater usage and equality of opportunity.

10. Promotes training and skills to improve access to employment for residents in neighbouring boroughs as well as City residents.
11. It is unclear how this policy will apply to heritage assets including education and interpretation. Mitigation in design policy.
12. Requires accessible streets and spaces for all City users and particularly for those with mobility difficulties
13. More inclusive buildings will encourage wider use of social and community facilities
14. Inclusive buildings and spaces will enable people with mobility difficulties to live independent and healthier lives.
15. More inclusive spaces will encourage educational trips.
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.
17. Improved air quality reduces acid damage on historic buildings.
18. Measures to improve air quality such as low emission vehicles and limits on emissions from building plant support climate change mitigation
19. Better air quality improves pedestrian experience.
20. Improved air quality will support improved health outcomes
21. Public spaces with better air quality will encourage greater usage and mixing of people and is better for pregnant women.
22. Reducing light pollution will help reduce energy consumption.
23. The reduction of light and noise pollution will encourage biodiversity
24. Disturbance from noise, vibration and light pollution 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
26. May compete for land with the business City but improves the range of facilities available to City workers
27. Maintains variety of uses including in historic buildings.
28. Supports retention and development of libraries and educational facilities
29. Social and community facilities such as libraries, community centres and places of worship meet the needs of different communities including those with protected characteristics
30. May impose additional costs on some major developments but improves visitor experience
31. Increased provision of public toilets may reduce fouling of the streets in areas of night-time activity

32. Public conveniences allow people to visit the City, access work, leisure, educational and cultural opportunities thereby encouraging inclusiveness
33. Well-designed play areas and recreational facilities will encourage people to use outdoor space, will increase surveillance, and social inclusion. Accessible play areas increase inclusion.
34. Recreation and play facilities could impact on biodiversity and open spaces, depending on the type of activities and site characteristics.
35. Participation in sport and recreation encourages healthy lifestyles
36. Play areas may impact and cause some disturbance to the business City.
37. Play facilities make housing attractive for families.
38. Opportunities for play improve health and educational experiences.
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.
40. Consideration of health impacts is likely to result in greater emphasis on placemaking and the quality of the public realm
41. Waste will be better managed by highlighting any health impacts of waste management practices.
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.
43. Health outcomes should improve.
44. Buildings will be designed for all ages and disabilities.

Mitigation proposed at Draft Plan stage:

- 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.
- 2) Review policies on sport and recreation to assess if wording is sufficient to avoid sport and recreation facilities reducing greening and biodiversity opportunities.
- 3) Add wording to policy on play to encourage inclusiveness between users of play facilities and local communities.

Response at Proposed Submission stage:

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.

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.

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.

Significant changes between the Draft Plan and Proposed Submission stages:

- Policy HL2 (Air quality) has been strengthened to reflect the City Corporation's new Air Quality Strategy and changes to the London Plan, including seeking large scale developments to adopt an air quality positive approach wherever possible
- As a result of the growing awareness that health outcomes for residents, visitors, workers and students need to be improved, a new policy HL9 (Health Impact Assessment) has been added to embed the consideration of health impacts within the planning process. Applicants proposing developments between 10 and 99 dwellings or between 1,000sqm and 9,999 sqm of commercial floorspace will be required to submit a Healthy City Planning Checklist, while larger-scale developments will require a Rapid or Full Health Impact Assessment (HIA).

Safe & 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	Equality and inclusion
S2	Safe and Secure City	↑↑↑ (1)	↑↓ (2,3)	↑↑↑ (1)	N	N	N	N	↑ (2)	N	↑↓ (2,3)	↑ (4)	N	↑ (4,5)	N	↑↓ (2,6)
SA1	Crowded Places	↑↑↑ (1)	↑↓ (2,3)	↑↑↑ (1,9)	N	N	N	N	↑ (7)	N	↑↓ (2,3)	N	↑ (8)	N	N	↑↓ (2,6)
SA2	Dispersal Routes	N	↑ (9)	↑ (9)	N	N	N	N	N	N	↑ (10)	↑ (4)	↑ (11)	↑ (4,5)	N	↑↓ (2,6)
SA3	Designing in Security	↑↑↑ (1)	↑ (12)	↑↑↑ (1)	↑ (13)	N	N	N	↑ (7)	N	N	N	N	N	N	↑↓ (2,6)

Comments:

1. Provides confidence for international businesses without undue visible presence
2. Security measures may inhibit accessibility
3. Promotes coordinated area-wide measures
4. Improves residential amenity
5. Contributes towards stress reduction
6. Promotes social and economic inclusion
7. The policy does not increase provision nor enhance the quality of open spaces
8. The policy does not encourage a vibrant social environment
9. Prevents overcrowding. Reduces potential for anti-social behaviour
10. Improved road safety
11. Provides for safe social spaces
12. Policy requires security measures to be integrated into design and sympathetic to the public realm
12. Policy requires security measures to be sympathetic to any heritage assets

Mitigation proposed at Draft Plan stage:

Design policies mitigate the potential impacts of security measures on the built environment.

- 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 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.

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	Equality and inclusion
S3	Housing	↑↓ (1, 2,3)	↑ (4, 8)	N	N	N	N	N	N	N	↑↑ (5)	↑ (6)	N	N	N	↑↑ (7)
HS1	Location of new housing	↑ (8)	↑ (8)	↑ (9)	N	N	N	N	N	N	↑ (5)	↑ (10)	↑ (10)	↑ (10)	↑ (10)	↑ (10)

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	Equality and inclusion
HS2	Loss of housing	↑ (11)	↑ (4)	N	N	N	N	N	N	N	N	↑ (12)	N	N	N	N
HS3	Residential environment	↑ (8)	↑ (8)	↑ (9)	N	N	↑ (13)	N	N	N	N	↑ (10)	↑ (14)	↑ (15)	N	N
HS4	Housing quality standards	N	↑ (8)	↑ (9)	N	↑ (16)	N	N	↑ (17)	N	N	↑ (18)	N	↑ (15)	N	N

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	Equality and inclusion
HS5	Short-term residential letting	↑↓ (20, 30)	N	↑ (9, 26)	N	N	↑ (19)	N	N	N	↑ (20)	↑↓ (29)	N	N	N	N
HS6	Student housing and hostels	↑↑↑ (21)	N	↑ (9, 26)	N	N	N	N	N	N	↑↑ (22)	↑ (23)	N	N	↑ (28)	↑ (28)
HS7	The Temples	↑ (24)	↑ (24)	↑ (9)	↑ (24)	N	N	N	N	N	↑ (25)	↑ (25)	N	N	N	N

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	Equality and inclusion
HS8	Older persons housing	N	N	N	N	N	N	N	N	N	N	↑ (27)	N	↑ (27)	N	↑ (31)
HS9	Self and custom housebuilding	N	↑ (32)	N	N	N	N	N	N	N	N	↑ (27)	N	N	N	N

Comments:

1. Policy restricts housing outside residential areas to protect commercial land uses.
2. Level of housing would have Marginal impact on housing shortage and costs for City workers.
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.
4. Enables efficient use of land.
5. Provides some housing in City, City fringe and neighbouring boroughs (supporting text) reducing need to travel.
6. Provides housing over the Plan period and in line with London Plan requirements. Contributes to meeting housing needs by increasing % of affordable housing on public land.
7. Requires proportion of affordable and accessible housing, with increased % of affordable on public land (some of which may be in neighbouring boroughs)

8. Prevents conflicts between residents and businesses by clustering housing, enhancing public realm.
9. Clustering housing enhances passive security.
10. Clustering enhances residential amenity, access to services and decreases isolation.
11. Reduces pressure for additional housing. Prevents single residential units blocking commercial development.
12. Retains housing stock that meets a housing need.
13. Addresses noise pollution.
14. Protects other uses through “agent of change” principle.
15. Protection of residential amenity and high-quality living environment good for mental health.
16. Provides area for waste and recycling bins.
17. Maximising opportunities for communal open 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.
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. Keeps historic buildings and gardens of Temples in active use for legal sector.
25. Provides accommodation for legal sector workers reducing the need for daily commuting.
26. Short-term tenants / residents may cause disturbance and anti-social behaviour
27. Provides suitable housing to meet specific needs
28. Supports educational opportunities
29. May compete for scarce land with permanent housing
30. May compete with offices

31. Meeting the needs of persons with a protected characteristic
32. May not represent an efficient use of land in the City's high-density environment

Mitigation proposed at Draft Plan stage:

- 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.
- 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?
- 3) Residential uses outside clusters and loss of individual units could protect at risk/historic buildings.
- 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.

Response at Proposed Submission stage:

- 1) No change. There is no policy basis for such a course of action.
- 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.
- 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.
- 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 HS8 (Older Persons Housing) 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.

Significant changes between the Draft Plan and Proposed Submission stages:

- A commitment to deliver 50% affordable housing on public sector land was added to Policy S3 (Housing) to conform with the London Plan policy approach.

Thriving Economy

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	Equality and inclusion
S4	Offices	↑↑↑ (1, 12)	↑↓ (2)	N	↑↓ (3)	↑↓ (4,12)	↑↓ (8)	↑↓ (8)	N	N	↑↓ (5)	↑↓ (6, 14)	N	N	↑↑ (9)	↑ (7)
OF1	Office Development	↑↑↑ (1)	↑↓ (2)	N	N	↑↓ (4,12)	↑↓ (8)	↑↓ (8)	N	N	↑ (13)	N	N	N	N	↑ (7)
OF2	Protection of Existing Office Floorspace	↑↑↑ (1)	N	N	↑ (3)	N	N	N	N	N	N	↑↓ (6) (14)	N	N	N	N

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	Equality and inclusion
OF3	Temporary 'Meanwhile' uses	↑ (10)	↑ (10)	↑ (10)	↑ (11)	↑ (11)	↑ (11)	↑ (11)	N	N	↑ (11)	N	↑ (11)	↑ (11)	↑ (11)	↑ (11)

Comments:

1. The City is an internationally important centre for economic activity and office-based employment.
2. Efficient Land Use, but increased pressure on public realm and the City's skyline.
3. Offices within heritage assets will be protected, but increased development puts increased strain on heritage.
4. Increasing the City's office stock will generate increased levels of construction and operational waste.
5. Increased worker density places more strain on public transport but development within the City makes efficient use of existing transport networks
6. Article 4 direction stops permitted development of B1 to housing
7. Policy encourages affordable workspace, where appropriate, reducing economic inequality
8. Promotes sustainable building design but office development will increase energy demands
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 requiring flexible workspace, 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 now allows office floorspace in or near identified residential areas to be lost where this would create additional housing, particularly for Build to Rent or Co-Living accommodation

Mitigation proposed at Draft Plan stage:

- 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.

Response at Proposed Submission stage:

- 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' Uses) 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.

Significant changes between the Draft Plan and Proposed Submission stages:

- Policy OF2 (Protection of Existing Office Floorspace) has been amended to introduce a more flexible approach to the loss of office floorspace to residential use in or near residential areas, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be more complementary to the business City.

Level of office growth alternatives¹

Policy Number	Policy	Economic growth	Built environment and public realm	Safe environment and crime	Heritage assets	Waste management	Environmental protection	Climate mitigation and	Open spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
	Low growth – only plan for what is already in the office pipeline 1.4m m ²	↓↓ (1)	↑ (4)	N	↑↓ (7)	↓↓ (8)	↑ (9)	↑ (9)	N	↑ (9)	↑↓ (11)	N	N	N	N	N
	Medium growth – plan to provide office floorspace to meet current GLA employment projections 2m m ²	↑↑ (2)	↑ (5)	N	↑↓ (7)	↓↓ (8)	↑ (9)	↑ (9)	N	↑ (9)	↑↓ (11)	N	N	N	N	↑ (14)
	High growth – plan to exceed GLA employment projections >2m m ²	↑↑ (3)	↓ (6)	↓ (6)	↑↓ (7)	↓↓ (8)	↑ (9)	↑ (9)	↓ (10)	↑ (9)	↓↓ (12)	↑ (13)	↑ (13)	↑ (13)	↑ (13)	↑ (14)

¹ Alternative scales of office growth were considered by the City Corporation between the Issues and Options and Draft Local Plan stage of plan development and the likely effects of the alternatives considered were documented in the IIA from Draft Plan stage onwards.

Comments:

1. Could provide too little office floorspace with regional implications for employment
2. In line with the GLA's employment projections for London
3. Could result in vacant office floorspace either in the City or elsewhere in London
4. Could reduce pressure on public realm
5. Planned floorspace in line with plans for public realm
6. Could increase pedestrian and vehicle congestion and put pressure on safety and security through over crowding
7. Offices within heritage assets will be protected, but increased development puts increased strain on heritage
8. Increased development will generate increased levels of construction and operational waste
9. Relies on sustainable design of new office floorspace compared with existing including urban greening, but resource impacts from demolition & construction
10. Will put additional pressure on open spaces
11. Increased worker density places more strain on public transport but development within the City makes efficient use of existing transport networks
12. Higher densities could overload transport network
13. Additional office floorspace competes with other uses
14. Improved job opportunities

Mitigation proposed at Draft Plan stage:

None proposed

Response at Proposed Submission stage:

N/A

Retailing

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	Equality and inclusion
S5 Retailing	Retailing	↑ (1)	↑ (2)	↑↓ (3, 4)	↑ (5)	↑ (11)	↑ (6)	↑ (12)	N	N	↑↓ (7)	↑↓ (8)	↑ (9)	N	N	↑ (10)
RE1	Principal Shopping Centres	↑ (1)	↑ (2, 13)	N	↑ (5)	N	N	N	N	N	↑ (14)	N	N	N	N	N

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RE2	Retail Links	↑ (1)	↑ (2)	N	N	N	N	N	N	N	↑ (14)	N	N	N	N	N
RE3	Ground floor retail provision elsewhere in the City	↑ (1, 15)	↑ (2)	N	N	N	N	N	N	N	↑↓ (7)	↑ (16)	N	N	N	N
RE4	Specialist Retail Uses	↑↓ (1, 17)	N	N	↑ (18)	N	N	N	N	N	N	N	↑ (19)	N	N	N

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	Equality and inclusion
RE5	Markets	↑ (1, 20)	↑ (21)	↑↓ (3, 4)	↑ (22)	↓ (21)	↑ (6)	↑ (12)	↑ (23)		↑↓ (24)		↑ (20)	N	N	↑ (10)

Comments:

1. Retail contributes to the City's visitor economy and provides employment
2. Supports retail and town centre uses that provide active frontage supported by complementary uses that increase footfall and vitality to public realm
3. Increases surveillance however potential issues regarding safety.
4. More risk of anti-social behaviour
5. Promotes retail development in the PSCs, some of which include historic markets and other heritage buildings (e.g. Leadenhall Market and Fleet Street).
6. May result in increase of noise, light pollution and nuisance if not appropriately managed.
7. Increased public access and ground floor frontages would improve and activate streets, but retail uses often require frequent deliveries.
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 social, leisure and cultural facilities
10. Increased provision and access to retail units would aid equality and inclusion. Low-skilled jobs.
11. Uncertain as retail produces large quantities of waste e.g. plastic waste, coffee cups and packaging
12. Depends on how shops/market stalls are designed and serviced.
13. Policy and text recognise the character and distinctiveness of the four PSCs
- 14 Focusing retail development in PSCs and along the Retail Links between them may reduce the overall need to travel
15. Protects office operation, residential amenity and PSCs

16. Policy seeks to protect comparison and convenience units that serve residential areas
17. Policy limits opportunity to redevelop for alternative uses through conditions attached to permissions
18. Safeguards uses and premises that are historically significant to the City by attaching conditions to planning permissions
19. Safeguards uses and premises that are culturally significant to the City by attaching conditions to planning permissions
20. Improves vibrancy and variability of retail offer
21. Improves vibrancy of built environment but potential for increased disposable waste from temporary markets
22. May have an impact on the setting of heritage assets, depends on location and management
23. Multiple uses of open space encouraged but markets must not involve the permanent loss of an open space
24. Markets activate streets but require setting up/taking down and may cause temporary obstruction

Mitigation proposed at Draft Plan stage:

- 1) Historic environment. Does the policy provide mitigation for uncertainty regarding heritage assets in Leadenhall Market and Fleet Street?
- 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.
- 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.
- 4) Provide clarity about whether markets would be allowed in open spaces.

Response at Proposed Submission stage:

- 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 and significance of the historic Leadenhall Market, which will be maintained and enhanced as a visitor and retail destination.
- 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.
- 3) No change. These issues are dealt with elsewhere in the sections of the Plan relating to Design and Vehicular Transport and Servicing. 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.

Culture, Visitors and the Night-Time Economy

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	Equality and inclusion
S6	Culture, Visitors and the Night-Time Economy	↑↑ (1)	↑ (2)	↑ (2)	↑ (3)	↕ (4)	↕ (5)	↕ (12)	↑ (2)	↕ (16)	↕ (6)	↕ (7)	↑ (8)	↑ (8)	↑ (8)	↑ (8)
CV1	Protection of Existing Visitor, Arts and Cultural Facilities	↑ (1)	↑ (2)	↑ (2)	↑ (3)	N	N	N	N	N	N	N	↑ (8)	↑ (8)	↑ (8)	↑ (8)
CV2	Provision of Visitor Facilities	↑ (1)	↑ (2)	↑ (2)	N	N	N	N	↑ (2)	↕ (16)	N	N	↑ (8)	↑ (8)	↑ (8)	↑ (8)
CV3	Hotels															

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	Equality and inclusion
		↕ (9)	↑ (2)	↑ (2)	↑ (10)	↕ (4)	↕ (5)	↕ (12)	N	N	↕ (6)	N	N	N	N	N
CV4	Evening and Night-time Economy	↑↑ (1, 13)	↑ (2)	↕ (2, 11)	↑ (3)	↕ (4)	↕ (5)	↕ (12)	↕ (2, 11)	↕ (16)	↕ (6)	↕ (14)	↑ (13)	↕ (14)	N	↕ (15)
CV5	Public Art	N	↑ (17)	↑ (17)	N	N	N	N	N	N	N	N	↑ (8)	↑ (8)	↑ (8)	↑ (17)

Comments:

1. Increased culture and night-time activity and increased visitor numbers will boost the economy. Creative and cultural provision may compete for space with the business City, but overall will make the City a more attractive location and attract businesses and skilled workers.
2. Increased creative and cultural provision will create more vibrant spaces adding interest to the public realm. More people will mean more surveillance.

3. May be opportunities to adapt heritage assets for cultural activity, assisting with Maintenance of assets. Cultural plans could include exhibitions and interpretation boards in relation to matters of historic interest.
4. Increases in the cultural and night-time economy sector are likely to create more waste although development may be carbon neutral. Need to minimise waste produced.
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.
6. Increased cultural and night-time activity and visitor numbers will avoid peak hours congestion but will put more pressure on public transport and require servicing/deliveries.
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.
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.
9. Hotels can boost the local economy but also displace potential office development.
10. Boutique hotels could be the only viable use for historic buildings at risk.
11. Increased risk of anti-social behaviour
12. New cultural/visitor developments may use resources more efficiently but will still use resources.
13. Adds to vibrant social environment which attracts workers to the City
14. Disturbance from night-time activities may impact on resident's mental health due to causing disturbance to sleep.
15. Evening and night-time economy includes a wide range of different uses which are likely to have varying impacts on different groups.
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 increased numbers of people, waste, noise etc.
17. Public art enhances the public realm thereby creating pleasant and safe spaces encouraging social cohesion.

Mitigation proposed at Draft Plan stage:

- 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.

Response at Proposed Submission stage:

- 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.

Significant changes between the Draft Plan and Proposed Submission stages:

- A new requirement has been added to Policy S6 (Culture, Visitors and the Night-Time Economy), which requires applicants submitting proposals for major development to produce a Cultural Plan. This reflects the Mayor's emphasis on the importance of cultural activity, as well as the Corporation's focus on Culture Mile and wider cultural activity. While discussing Cultural Plans through the IIA process it was noticed that the policies on culture do not specify that proposed cultural facilities should be open to the public. Wording has been amended to remedy this.

Smart 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	Equality and inclusion
S7	Smart Infrastructure and Utilities	↑↑ (1)	↑ (2,5)	N	↑↓ (2,6)	↑ (3)	↑ (3)	↑ (3)	N	N	↑ (4)	N	N	N	N	N
IN1	Infrastructure provision and connection	↑↑ (1)	↑ (5)	N	↓ (6)	↑ (3)	↑ (3)	↑ (3)	N	N	↑ (4)	N	N	N	N	N
IN2	Infrastructure Capacity	↑↑ (1)	↑ (5)	N	N	N	N	↑↓ (7)	N	N	↑ (4)	N	N	N	N	N

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	Equality and inclusion
IN3	Pipe Subways	↑↑ (1)	↑ (8)	N	↑ (8)	N	↑ (8)	N	↑ (8)	N	↑ (9)	N	N	N	N	N

Comments:

1. The policy will facilitate state-of the-art digital connectivity and utility infrastructure to support the business city enabling the City to grow and compete with other global financial and business centres. In turn, it will provide the business environment to attract and retain global financial, business services and TMT companies.
2. The policy aims to minimise adverse impacts on visual amenity, character and appearance and heritage assets, therefore enhancing the built environment and the public realm.
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
6. New infrastructure may potentially have negative impacts on the City's heritage assets
7. Need to address the issue of over 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

Mitigation Proposed at Draft Plan Stage:

- 1) Include reference to heritage assets to ensure the provision of utilities and other infrastructure does not cause harm to same.

Response at Proposed Submission Stage:

- 1) Policy IN1 (Infrastructure Provision and Connection) has been amended to include reference to the provision of well-designed and located mobile digital infrastructure.

Outstanding Environments

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	Equality and inclusion
S8	Design	↑ (1)	↑ (2)	↑ (7)	↑ (3)	↑ (4)	↑ (4)	↑ (4)	↑ (5)	↑ (5)	↑ (9)	N	N	↑ (8)	N	↑ (6)
DE1	Sustainability Standards	↑↓ (1,10)	N	N	N	↑ (4)	↑ (4)	↑ (4)	N	↑ (4)	↑ (4)	N	N	N	N	N
DE2	New Development	↑ (1)	↑ (2)	N	↑ (3)	↑ (11)	↑ (12)	↑ (11, 13)	N	↑ (13)	N	N	N	N	N	↑ (6)
DE3	Public Realm	↑ (1)	↑ (2)	↑ (14)	↑ (3)	N	↑ (15)	↑ (16)	↑ (17)	↑ (17)	↑↓ (18)	N	↑ (19)	↑ (8)	N	↑ (6)

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	Equality and inclusion
DE4	Pedestrian Permeability	N	↑ (2)	↕ (20)	↑ (21)	N	N	N	N	N	↑ (9)	N	N	↑ (22)	N	↑ (6)
DE5	Terraces and Viewing Galleries	↕ (23)	↑ (2)	N	↑ (24)	N	N	N	↑ (5)	↑ (13)	N	↑ (25)	N	N	N	N
DE6	Shopfronts	N	↑ (2)	N	↑ (3)	N	N	N	N	N	N	N	N	N	N	N

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	Equality and inclusion
DE7	Advertisements	N	↑ (2)	N	N	N	N	N	N	N	N	N	↓ (27)	N	N	N
DE8	Daylight & sunlight	↓ (28)	↑ (29)	N	N	N	↑ (30)	N	↑ (30)	↑ (30)	N	↑ (31)	N	N	N	N
DE9	Lighting	N	↑ (2)	N	↑ (3)	N	↑ (32)	N	N	N	N	N	N	N	N	N

Comments:

1. Good, sustainable design creates a more desirable location for companies,

2. Policy actively looks to enhance the quality of the built environment and public realm.
3. Policy provides protection and seeks to enhance heritage assets
4. Requirement for high BREEAM scores
5. Policy seeks to deliver public space at upper levels of buildings and to optimise greenery/amenity space
6. Policy promotes accessible buildings and public realm
7. Requires security measures as an integral part of design
8. Improved public realm and open spaces provide health benefits
9. Increased permeability around the City
10. Greater BREEAM requirements increases construction costs
11. Requires use of durable materials
12. Policy seeks to avoid unacceptable wind and solar glare impacts
13. Supports urban greening.
14. Safe and functional public realm promoted.
15. Policy requires sensitive co-ordination of lighting
16. Promotes SuDs and rainwater recycling
17. Seeks inclusion of trees and soft landscaping and promotion of biodiversity
18. Supporting text emphasises appearance rather than function of public realm
19. Public realm enhancements encourage cultural activity and social interaction
20. Emphasises pedestrian permeability – servicing and vehicle permeability not addressed
21. Policy requires retention of routes and spaces of historic interest
22. Improved permeability encourages walking and active lifestyles
23. Terraces and viewing galleries add to development costs but can provide a valued amenity for office occupiers
24. Policy aims to retain and enhance historic roof forms

25. Protects residential amenity
26. Avoids projecting adverts which may obstruct movement; but no mention of a-boards.
27. Restrained approach to advertising may impact on the City's vibrancy
28. Stringent daylight/sunlight policies could stop some new developments
29. Ensures adequate daylight & sunlight in line with BRE guidance
30. Policy seeks to protect the daylight/sunlight to open spaces.
31. Protecting daylight/sunlight improves amenity
32. Requires measures to reduce potential for light spillage

Mitigation proposed at Draft Plan Stage:

- 1) Daylight & Sunlight policy needs to be altered to reflect the highly urban area of the City of London

Response at 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.

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 greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Equality and inclusion
S9	Vehicular Transport & Servicing	↑↑↓↓ (1, 1a/b)	↑ (2)	↑ (2)	N	↑ (1)	↑ (2)	↑↓ (2,3)	N	N	↑↑ (4, 5)	N	N	↑ (2)	N	N
VT1	The impacts of development on transport	↑ (7)	N	N	N	↑↑ (6)	N	N	N	N	↑ (7)	N	N	N	N	N
VT2	Freight & servicing	↑↑ (1)	↑ (2)	↑ (8)	N	↑↑ (10)	↑↑↓↓ (9, 9a)	↑↑↓↓ (9, 9a)	N	N	↑↑↓↓ (9, 9a)	N	N	↑↑↓↓ (9, 9a)	N	N

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	Equality and inclusion
VT3	Vehicle Parking	↑ (11)	↑↓ (12, 12a)	↑ (13)	N	N	↑ (12)	↑ (12)	N	N	↑↓ (12, 12a)	N	↑ (14)	↑ (12)	N	↑ (15)
VT4	River Transport	N	N	N	N	↑ (17)	↑ (16)	↑ (16)	N	N	↑ (18)	N	N	↑↓ (16)	N	N
VT5	Aviation Landing Facilities	↑↑↓ (21)	↑ (19)	↑ (20)	N	N	↑ (19)	N	N	N	N	N	N	N	N	N

Comments:

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. Climate resilience not mentioned
4. Enables better movement of vehicles including outside the City by reducing vehicle numbers through consolidation
5. Promotes and improves public transport provision
6. Construction logistics plans will address waste movements
7. Transport Assessments ensure that transport issues are addressed for major development
8. Opportunity to inspect vehicles before they come into the City
9. Consolidation centres could affect air quality, transport and movement in other boroughs, increasing emissions in those areas although reducing in the City
- 9a. Some routes will improve but some may experience more traffic
10. Not clear how waste consolidation will work and whether it will result in greater need for waste storage space
11. Enables use of land for productive activities – not just car parking
12. Reduces car use and associated congestion and air quality/ carbon emission impacts with improved health outcomes
- 12a. Reduces availability of short-term parking for dropping off, deliveries and loading
13. Reduces risk of vehicle related safety/ terrorist incidents in the City
14. Could release car parks for cultural events – temporary or meanwhile uses
15. Provides for car parking for Blue Badge Holders
16. Takes traffic off the roads but boats can cause air pollution with high carbon emissions
17. Waste transfer station at Walbrook Wharf included in policy
18. Improves movement of goods and people
19. Protects environment from noise and disturbance associated with helicopters
20. Allows for emergency response helicopters
21. Could deter some businesses but proximity to City Airport and improved links with other London airports provides alternatives

Mitigation proposed at Draft Plan Stage:

- 1) Clear monitoring framework is needed to assess the impact of consolidation centres approach

Response at Proposed Submission Stage:

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.

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	Equality and inclusion
S10	Active Travel and Healthy Streets	↑ (1)	↑↓ (2, 3)	↑ (2)	N	N	↑ (4)	↑ (4)	↑ (5)	N	↑↑↓↓ (6)	N	N	↑ (7)	N	↑ (8)
AT1	Pedestrian Movement	↑ (9)	↑ (2)	↑ (2)	↑ (10)	N	↑ (11)	↑↓ (11, 12)	↑ (5)	N	↑ (7)	N	N	↑ (7)	N	↑ (8)
AT2	Active Travel including Cycling	↑ (9)	↑ (2)	↑ (2)	N	N	↑ (13)	↑ (13)	N	N	↑ (13)	N	N	↑ (13)	N	↑ (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	Equality and inclusion
AT3	Cycle Parking	↑↓ (15, 20)	↑↓ (16, 18)	↑ (17, 19)	N	N	↑ (14)	↑ (14)	N	N	↑ (14)	N	N	↑ (14)	N	N

Comments:

1. Depends on access for servicing
2. Provides safer more attractive pedestrian priority streets
3. Concentrates vehicles and pollution on surrounding streets
4. Air quality, noise and climate resilience all addressed
5. Creates additional traffic free open spaces
6. Improves movement for pedestrians and cycles at the potential expense of vehicle movement e.g. buses
7. Healthier less polluted streets encourage more active travel
8. Walking & cycling provide more equitable means of transport. Policy takes account of disabled people's needs
9. New and enhanced pedestrian and cycle routes improve travel choice for City workers
10. Historic routes safeguarded
11. Timed closures reduce pedestrian's exposure to poor air quality and reduce carbon emissions
12. No mention of climate resilience or greening of streets
13. Facilitating active travel reduces emissions from vehicles
14. Provision of changing facilities and cycle parking encourages active travel

15. Reduces space for offices but attracts City workers
16. Keeps streets clear of parked bikes
17. Provides secure cycle storage – reduced opportunity for theft
18. Cargo bikes making deliveries could cause congestion on pavements
19. Could mention facilities needed for folding bikes and scooters
20. Need monitoring of cycle parking use to check whether space continues to be available for cycle parking

Mitigation proposed at Draft Plan stage:

- 1) Include mention of greening and climate resilience in text.
- 2) Could include reference to folding bikes and scooters in text.

Response at Proposed Submission stage:

- 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.

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	Equality and inclusion
S11	Historic Environment	↑↓ (1,2)	↑↑↑ (3)	N	↑ (4)	N	N	N	↑ (6)	↑ (6)	N	N	↑ (7)	N	↑ (8)	↑ (9)
HE1	Managing change to heritage assets	↑↓ (1,2)	↑↑↑ (3)	N	↑ (4)	N	N	N	↑ (6)	↑ (6)	↑ (10)	N	↑ (7)	N	N	↑ (9)
HE2	Ancient Monuments and archaeology	↑↓ (1,2)	↑↑↑ (3)	N	↑ (4)	N	N	N	N	N	N	N	↑ (7)	N	↑ (8)	N
HE3	Setting of the Tower of London WHS	↑↓ (1,2)	↑↑↑ (3)	N	↑↑↑ (5)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Historic environment is unique selling point for the City
2. Could restrict redevelopment and intensification of business premises, although change to Draft Plan policy may allow greater flexibility to alter non-designated heritage assets
3. Provides attractive place for national and international businesses & visitors
4. Local impact – policy applies within the City. Change to Draft Plan policy may provide less protection for non-designated heritage assets
5. National and international impact –protects outstanding universal value of UNESCO World Heritage Site
6. Includes protection for historic parks and gardens which provide biodiversity opportunities
7. Allows change of use while preserving heritage assets
8. Interpretation and publication encourages education
9. Tension between access and protection of historic significance
10. Protecting and reinstating historic pedestrian routes encourages active travel

Mitigation proposed at Draft Plan stage:

- 1) Include reference in the supporting text to Historic England’s guidance on inclusive access to historic buildings and sites.
- 2) References to interpretation should be included improving the impact on education.

Response at Proposed Submission stage:

- 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.
- 2) Additional wording has been added to Policy S11 (Historic Environment) regarding the enhanced experience and interpretation of the City’s cultural and heritage assets.

Significant changes between the Draft Plan and Proposed Submission stages:

- Further information has been provided on the policy approach to non-designated heritage assets in Policy HE1 (Managing Change to Heritage Assets) to provide a clearer distinction between them and designated heritage assets.

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	Equality and inclusion
S12	Tall Buildings	↑↑↓ (1, 2)	↑ (3,4)	↑ (5)	↑↑↑ (6,7)	N	↑ (8)	N	↑ (9)	N	N	N	N	N	N	↑ (10)
S13	Protected Views	↓↓ (1, 2)	↑ (3,4)	N	↑↑↑ (6,7)	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Constraints on development of tall buildings could reduce the City's economic growth potential. Policy S12 encourages tall buildings on appropriate sites while setting out areas which are inappropriate for new tall buildings, including areas covered by protected views.

2. Additional constraints on development of tall buildings could reduce economic growth but the backdrop to the Tower was already protected by LVMF views so the impact is likely to be limited
3. Managing the location of tall buildings improves the quality and appearance of the built environment.
4. A clearer approach to areas that are inappropriate for tall buildings will improve the effectiveness of this policy but the changes from the Draft Plan policy only affect a small area of the City
5. Policy applies the CAA's maximum height limit of tall buildings for the safety of international flights.
6. Protection of views and conservation areas helps to protect heritage assets, including views of iconic historic buildings
7. National and international impact –protects outstanding universal value of UNESCO World Heritage Site
8. Policy seeks to protect the public realm from environmental impacts and ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence.
9. Policy looks to protect existing open spaces while providing new spaces inside and at the top of buildings
10. Making buildings freely accessible improves the inclusivity of the City.

Mitigation proposed at Draft Plan stage: None

Response at Proposed Submission stage: N/A

Significant changes between the Draft Plan and Proposed Submission stages:

- Refinements to the policies on tall buildings and protected views, including recognition in Policy S12 (Tall Buildings) and in illustrative diagrams that the protected silhouette of the Tower of London on the eastern fringe of the City is an area inappropriate for tall buildings

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	Equality and inclusion
S14	Open Spaces and Green Infrastructure	↑ (1)	↑ (2)	↕ (2, 11)	↕ (3, 12)	N	↑ (4)	↑ (5)	↑ (6)	↑ (6)	↑ (7)	N	↑ (8)	↑ (9)	N	↑ (10)
OS1	Protection and provision of open spaces	↑ (1)	↑ (2)	↕ (2, 11)	↑ (13)	N	N	↕ (14)	↑ (6)	↕ (14)	↑ (7)	N	↑ (8)	↑ (9)	N	↑ (10)

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	Equality and inclusion
OS2	City Greening	↕ (1, 15)	↑ (2)	N	↕ (16)	N	↑ (4)	↑ (5)	↑ (6)	↑ (6)	N	N	N	↑ (9)	N	N
OS3	Biodiversity	↕ (1, 17)	↑ (2)	N	↕ (3, 8)	N	↑ (4)	↑ (5)	↑ (6)	↑ (6)	N	N	N	N	N	N

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	Equality and inclusion
OS4	Trees	↑ (18)	↑ (19)	N	↑↓ (20)	N	↑ (21)	↑ (22)	↑ (23)	↑ (23)	N	N	N	↑ (9)	N	N

Comments:

1. Economic benefits from GI, improves productivity of workers and makes the city a more desirable place for businesses.
 2. GI and open space enable an attractive public realm with passive surveillance in a dense urban environment.
 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.
 4. Widespread environmental benefits, e.g. air quality, urban heat island, rainwater run-off and biodiversity enhancement.
- Promotes climate resilient planting/climate mitigation insulation
5. Promotes climate resilient planting/climate mitigation insulation
 6. Protects and enhances open space and biodiversity
 7. GI and open space will promote active transport through walking and cycling and help reduce the harmful emissions from transport.
 8. Improved opportunities for leisure
 9. Evidence demonstrates a positive correlation between GI/open space, good mental and physical health. Promotes well-being and opportunities for leisure

10. Public access to open spaces provides equal opportunity for all to experience positive impacts on physical health and mental wellbeing
11. Increased opportunity for anti-social behaviour
12. Protection of open spaces but not specifically Historic Parks and Gardens
13. Protects historic interest, e.g. churchyards
14. Includes civic open spaces which may not be green
15. May add to development and maintenance costs
16. Uncertain what impact greening would have on character of historic buildings.
17. Potential conflict of SINCs impacting on economic and business growth of areas of City e.g. if extended to green roofs
18. Trees make the city a more desirable place for businesses to choose to locate.
19. Trees enable an attractive public realm, enhance visual amenity and soften the impact of buildings and hard surfaces within a dense urban environment.
20. 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.
21. 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.
22. Mitigate against effects of climate change – e.g. providing shade and shelter from sun, rain and wind, ameliorating the urban heat island effect and reducing vulnerability to flooding.
23. Trees provide an important habitat within a dense urban environment, supporting biodiversity and enhancing the value of open spaces.

Mitigation proposed at Draft Plan stage:

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

Response at Proposed Submission stage:

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.

Significant changes between the Draft Plan and Proposed Submission stages:

- Policy OS4 (Trees) is a new policy which has been added to increase the number of trees and their overall canopy cover.

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	Equality and inclusion
S15	Climate Resilience and Flood Risk	↑ (1)	↑ (2)	N	↕ (7,8)	N	↑ (3,4)	↑ (5)	↕ (7)	↑ (6)	N	↑ (5)	↑ (5)	↑ (3)	N	N
CR1	Overheating and Urban Heat Island Effect	↑ (1)	↑ (2)	N	N	N	↑ (3)	↑ (5)	↑ (7)	↑ (6)	N	↑ (5)	↑ (5)	↑ (3)	N	N
CR2	Flood Risk	↑ (1)	↑ (2)	↑ (9)	↕ (7,8)	N	↑ (3,4)	↑ (5)	N	N	N	↑ (5)	↑ (5)	N	N	N
CR3	Sustainable Drainage Systems	↑ (1)	↑ (2)	N	↕ (7,8)	N	↑ (3,4)	↑ (5)	↕ (7)	↑ (6)	N	↑ (5)	↑ (5)	N	N	N

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	Equality and inclusion
CR4	Flood Protection and Flood Defences	↑ (1)	↑↓ (7)	↑ (9)	↑↓ (7,8)	N	↑ (3,4)	↑ (5)	N	N	N	↑ (5)	↑ (5)	N	N	N

Comments:

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
3. Limiting overheating risk – good for air quality
4. SuDs flood protection improves water quality – reduces sewer overflow flooding
5. Reduces overheating and provides flood protection for built environment including housing and public realm
6. Green roofs and SuDS improve biodiversity potential
7. Depends on design of climate resilience and flood defence measures especially on the Thames riverside and historic parks and gardens (Temples)
8. Protects heritage assets from flooding
9. Improves safety from flooding

Mitigation proposed at Draft Plan stage:

1. Include reference to taking account of other historic assets, not just archaeology, in SuDS policy (CR3).

Response at Proposed Submission stage:

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.

Circular Economy & 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	Equality and inclusion
S16	Circular Economy and Waste	↑↑ (1)	↑↑ (3)	↑↑ (5)	N	↑↑ (1,2)	↑↑ (4,5)	↑↑ (4,6)	N	N	↑↑ (5, 6)	N	N	↑↑ (5, 7)	N	N
CE1	Zero Waste City	↑↓ (1,2, 8)	↑ (3)	N	↑↓ (3, 9)	↑↑ (10)	↑↓ (5,11)	↑ (10)	N	N	↑↑ (5)	↑ (13)	N	N	N	N
CE2	Sustainable Waste Transport	↑↑ (1)	↑↑ (14)	↑↑ (5, 12)	N	↑↑ (5)	↑↑ (5)	↑↑ (5,7)	N	N	↑↑ (5, 12)	N	N	↑↑ (5, 7)	N	N

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	Equality and inclusion
CE3	New Waste Management Sites	↑↓ (2)	↑ (3)	N	N	↑↑ (2)	↑↓ (4, 11)	↑ (4)	N	N	↑↑ (5)	N	N	↑ (15)	N	N

Comments:

1. Waste and resources planning provides environment for responsible businesses to thrive
2. Space for waste reduces space for other uses but waste management on site or in the City eliminates need for transfer
3. Positive waste planning keeps public realm and built environment clear of unsightly waste
4. Ensures waste sites are built in suitable locations with appropriate environmental safeguards and carbon considerations
5. Effective waste planning will reduce road miles for waste with consequential positive impacts on air quality, road safety and health
6. Co-operation with other waste planning authorities supports provision of waste facilities in suitable locations to deal with City's waste.
7. Waste apportionment and river / rail transport 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
10. Adoption of Circular Economy principles will reduce the long term need for waste management facilities
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 quality impacts, noise and odours if not effectively managed

Mitigation proposed at Draft Plan stage:

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.
2. Include references in the supporting text to impacts on neighbouring occupants

Response at Proposed Submission stage

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.
2. The supporting text to Policy CE1 (Zero Waste City) has been strengthened to avoid adverse local impacts.

Key Areas of Change

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	Equality and inclusion
S17	Thames Policy Area (The unique character of the City's riverside, and its uses for transport and recreation, will be enhanced)	↑↑ (1)	↑↑ (2)	↓ (3)	↑ (4)	↑↑ (5)	↑↑ (6)	↑ (7)	↑ (8)	↑↑ (8, 9)	↓ (10)	N	↑ (2, 8)	N	N	N

Comments:

1. The River Thames is a tourism and recreational asset. Ensures that buildings and spaces on or near the riverside contribute to sustainable economic growth
2. Enhances pedestrian permeability and accessibility and supports the aims of the Riverside Walk Enhancement Strategy
3. Potential increase in people visiting the area could result in an increase in anti-social behaviour.
4. Policy safeguards heritage assets, which enhance the character of the riverside
5. 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.
6. Policy safeguards land for the Thames Tideway Tunnel project, which would result in significant improvements to prevent raw sewerage from entering the Thames.
7. Thames Tideway Tunnel would capture and divert storm overflows.

8. Blackfriars Bridge foreshore will include a civic space, green terraces, and a venue for outdoor events and public artwork. Protects public access and river views along the riverside walk

9. Policy protects Metropolitan SINC and seeks opportunities to create/enhance riverside habitats. More visitors could disturb some wildlife but a net positive impact.

10. Policy aims to retain Blackfriars Pier, and access to Tower Pier, and encourages the reinstatement of Swan Lane Pier. Improved vehicle and pedestrian flows are planned to improve the area, but no specific schemes set out.

Mitigation proposed at Draft Plan stage:

- 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?

Response at Proposed Submission stage:

- 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.

Blackfriars

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	Equality and inclusion
S18	Blackfriars (The character and amenities of the Blackfriars Key Area of Change will be enhanced)	↑ (1)	↑ (2)	↕ (3)	↑ (4)	↑↑↓↓ (5)	↑↑ (6)	↕ (7)	↑ (2, 9)	↑ (2, 9)	↑ (8)	N	↑ (2, 9)	N	N	N

Comments:

1. The substantial redevelopment of this area to provide new high-quality office and commercial accommodation would support economic growth.
2. Policy seeks to enhance pedestrian permeability and accessibility and create a high-quality new public realm with urban greening.
3. Potential increase in people visiting the area could result in an increase in anti-social behaviour
4. Heritage assets in the area would be enhanced by proposals.
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
6. Policy safeguards land for the Thames Tideway Tunnel project, which would result in significant improvements to prevent raw sewerage from entering the Thames
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.
8. Policy proposes improved accessibility, especially to and along the riverside and across Upper Thames Street
9. Blackfriars Bridge foreshore will include a civic space, green terraces, and a venue for outdoor events and public artwork.

Mitigation proposed at Draft Plan stage:

- 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.

Response at Proposed Submission stage:

- 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).

Pool of London

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	Equality and inclusion
S19	Pool of London (The Key Area of Change will be renewed through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements)	↑ (1)	↑ (2)	↓ (3)	↑↑↑ (4)	↑↑↓ (5)	↓ (6)	↓ (6)	↑ (2)	↑ (2)	↑ (7, 8)	↓ (9)	↑ (10)	N	N	N

Comments:

1. The substantial redevelopment of this area to provide new high-quality office and commercial accommodation would support economic growth.
2. Policy seeks to enhance pedestrian permeability and accessibility and create a high-quality new public realm with active frontages and urban greening.
3. Potential increase in people visiting the area could result in an increase in anti-social behaviour.
4. Heritage assets in this area would be enhanced by proposals. Indicates that development and public realm works in the area should seek to enhance the immediate surroundings of the Tower of London WHS.
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
6. Policy aims to identify pollution reduction measures at locations along the river but would be hard to alleviate due to current road layout

7. Improved transport connections and pedestrian links are planned to enhance connectivity, especially across Lower Thames Street and along the Riverside Walk
8. Redevelopment and refurbishment offer the opportunity to revisit existing servicing arrangements
9. Retail and night-time uses may impact on existing residential amenity
10. Policy encourages the provision of cultural events, arts and play in public spaces along the riverside.

Mitigation proposed at Draft Plan stage:

- 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

Response at Proposed Submission stage:

- 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).

Aldgate, Tower and Portsoken

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	Equality and inclusion
S20	Aldgate and Tower Key Area of Change (Promoting office-led commercial development whilst meeting the needs of residents and visitors and improving transport and public realm)	↑ (1,7)	↑ (2)	↕ (3)	↑↑↑ (9)	↓ (4)	↕ (3)	↕ (3)	↑ (5)	↑ (5)	↕ (6)	↑ (1, 8)	↑ (8)	↑ (8)	↑ (8)	↑ (8)

Comments:

1. Policy promotes office-led commercial development alongside existing residential development, whilst also supporting residential development in appropriate locations
2. Office/economic development makes efficient use of land and improves public realm through CIL payments and benefits from visitors.
3. Depends on design and implementation
4. Increased development and visitor numbers will generate increased levels of construction / operational waste
5. Enhanced public realm and open spaces will include opportunities for urban greening
6. Increased worker density and visitors places more strain on public transport and streets but development within Aldgate & Tower makes efficient use of existing transport networks
7. Improved training and education may benefit local businesses.

8. Will support residents' needs.

9 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

Mitigation proposed at Draft Plan stage:

1) 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).

Response at Proposed Submission stage:

1) 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.

City Cluster

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	Equality and inclusion
S21	City Cluster (The Key Area of Change will accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements)	↑↑↑ (1)	↑ (2)	↑ (3)	↑ (4)	↓ (5)	↑↓ (6)	↑↓ (7)	↑ (2)	N	↑↓ (8)	N	↑ (9)	↑ (10)	↑ (10)	N

Comments:

1. Policy supports development of significant employment floorspace. This area is the financial heart of the City and many firms have an international workforce.
2. Requirement for high quality design but intensification of development will put increased stress upon public realm and open spaces
3. Policy places an emphasis on area-wide security measures
4. Policy seeks to place tall buildings on appropriate sites and to preserve heritage assets, but could be some impacts given scale of development
5. Significant level of development activity will generate increased construction and operational waste
6. Tall buildings can have impacts on local environment through wind, sunlight etc. Policy seeks to manage these cumulative environmental impacts. The City Corporation has published microclimate guidelines.

7. Promotes sustainable building design but office development will increase energy demands
8. Increased density leads to greater pressures on roads and pavements. Policy seeks to mitigate this through prioritising pedestrian movement.
9. Seeks to enhance vibrancy and cultural activities, e.g. Sculpture in the City
10. Improving access to health and education facilities is promoted.

Mitigation proposed at Draft Plan stage: None

Response at Proposed Submission stage: N/A

Fleet Street and Ludgate

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	Equality and inclusion
S22	Fleet Street and Ludgate (The character and function of the Key Area of Change as a centre for judicial and related business, a key processional route and a Principal Shopping Centre will be promoted)	↑ (1)	↑ (2, 3)	↑ (2)	↑↑↑ (3,4)	N	N	N	↑ (5)	↑ (5)	↑↑↓ (6)	↑ (7)	N	N	N	N

Comments:

1. Development of new court facilities will strengthen the legal cluster in the area and improved retailing would benefit workers and visitors.
2. Seeks to improve the capacity, accessibility and safety of the public realm
3. Protects and enhances character and appearance of the historic processional route.
4. 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.
5. Encourages additional greening on streets and open spaces and the greening of buildings.

6. Junction improvements will address transport issues, particularly at Ludgate Circus. Policy promotes improvements to pavements, which will ease pedestrian flows, but this could impact on vehicular movement including buses.

7. 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

Mitigation proposed at Draft Plan stage: None

Response at Proposed Submission stage: N/A

Significant changes between the Draft Plan and Proposed Submission stages:

- The Fleet Street Key Area of Change has been extended to include Ludgate Hill and renamed the 'Fleet Street and Ludgate' Key Area of Change

Smithfield and Barbican²

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	Equality and inclusion
S23	Smithfield and Barbican KAOC (Improve the Smithfield and Barbican area)	↑↑ (1)	↑ (2)	↕ (3)	↑↑ (4)	↕ (5)	↑ (6)	↑ (6)	↑ (7)	↑ (7)	↑ (8)	↕ (9, 20)	↑↑↑ (10, 11)	N	↑ (12)	N

² Incorporates Strategic Policy S24 (Culture Mile Implementation), Policy SB1 (Culture Mile Impacts) and Strategic Policy S25 (Smithfield).

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	Equality and inclusion
S24	Culture Mile Implementation (Promote and protect Culture Mile as the City's main cultural centre and world-class cultural destination).	↑↑ (1, 13)	↑ (2)	↕ (3)	↑ (4)	↕ (5)	N	N	N	N	↑ (8, 14)	↕ (9)	↑↑↑ (10,11)	N	↑ (12,15)	↑ (15)
SB1	Culture Mile Impacts (Protect the amenity of residents, workers and occupiers and conserve and enhance the character of Designated/non-designated heritage assets)	N	N	N	↑↑ (16)	N	N	N	N	N	↑ (8)	↑ (17)	N	N	N	N
S25	Smithfield (Protect and enhance the distinctive mixed-use and historic character).	↑↑ (1)	↑ (2)	↕ (3)	↑↑ (4, 18)	↕ (5)	N	N	N	N	↑ (8)	↕ (9)	↑↑↑ (10,11)	↑↑ (19)	N	N

Comments:

1. Potential loss of some current uses but development of key sites will boost growth and investment, particularly in the visitor economy.

2. Seeks to enhance the character of the area through sensitive change and public realm improvements
3. Culture Mile would attract more visitors, which will improve surveillance but could result in more antisocial behaviour.
4. Heritage assets would be enhanced through protection and sensitive re-use.
5. Increased number of visitors and activity likely to generate more waste, although depends on management and street cleaning arrangements.
6. Supports improvements to air quality, including Zero Emission Zone and Zero Emission Street (Beech St)
7. Increased green infrastructure is proposed in the public realm and on buildings
8. Policy supports traffic management measures and improvements to pedestrian and cycle routes.
9. Potential for conflict between residential amenity and cultural vibrancy/night-time economy
10. This area is recognised in London Plan as a strategic cultural area and Culture Mile seeks to further develop the cultural offer.
11. Provides opportunities for social interaction
12. Educational activities are part of the Culture Mile proposals.
13. Policy encourages provision of premises suitable for specific sectors (e.g. digital and creative industries)
14. Identifies the Culture Spine as a key route and the need for appropriate transport infrastructure
15. Policy promotes joint working with Islington to benefit local communities, including education, skills and employment opportunities
16. Seeks to conserve and enhance heritage assets, including through suitable lighting schemes
17. Requires noise mitigation and other measures to protect amenity
18. 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.
19. Supports the continued presence of St Barts and recognises its importance as a renowned teaching hospital and centre for excellence
20. Policy supports and enables residential development in appropriate locations.

Mitigation proposed at Draft Plan stage:

- 1) Crime is not addressed in the policy, but possible increased crime is addressed in Local Plan policies for the whole City
- 2) Waste management is not addressed in the policy, but waste management is addressed in Local Plan policies for the whole City

3) The protection of residents' facilities is dealt with in depth in the Local Plan

Response at Proposed Submission stage

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.

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.

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.

Liverpool Street

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	Equality and inclusion
S26	Liverpool Street (The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by good public transport accessibility, the opening of the Elizabeth Line and restoration of Finsbury Circus and the redevelopment and refurbishment of Broadgate)	↑ (1)	↑ (2)	↑↓ (3)	↕ (4)	↓ (5)	N	N	↑ (6)	↑ (6)	↑↑ (7)	N	↑↑ (8)	↑ (7)	N	N

Comments:

1. Increased development and the encouragement of flexible/ collaborative workspace will enable increased economic growth, retail sales and a further development of the creative eco-system.
2. Policy supports the increased permeability of the area, improved public realm and enhancements to street markets.

3. Policy seeks to increase the capacity on pavements, which will improve the safety of pedestrians. However, the increase in leisure activity could increase antisocial behaviour.
4. Depends on implementation
5. Increased development will generate increased levels of construction / operational waste
6. Environmental enhancements provide opportunities for new green open spaces and urban greening.
7. New and enhanced walking routes will improve pedestrian movement and health opportunities. Area will benefit from opening of Elizabeth Line and policy seeks improvements to Liverpool Street Station.
8. Promotes the area as a gateway to Culture Mile and collaboration with creative industries in Culture Mile.

Mitigation proposed at Draft Plan stage:

- 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.

Response at Proposed Submission stage:

- 1) Other Plan policies such as CV4 (Evening and Night-Time Economy) and SA2 (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.

Implementation

Planning Contributions and viability assessments

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	Equality and inclusion
S27	Planning Contributions	↑↑↑ (1)	↑ (2)	↑ (3)	N	N	N	N	↑ (4)	N	N	↑↑ (5)	↑↑ (6)	N	N	↑↑ (7)	↑↑ (6,7)
PC1	Viability Assessments	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

Comments:

1. Enables provision of infrastructure to support the global business centre.
2. Provides funding to deliver public realm improvement
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. Policy PC1 is a process policy which sets out technical requirements for viability appraisals to support implementation of Policy S27.

Mitigation proposed at Draft Plan stage: 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.

Response at Proposed Submission stage: N/A