

City of London
City Plan 2036

Integrated Impact Assessment
Appendix 7
Policy Stories

City Plan 2036 proposed submission version
March 2020



Appendix 7 Policy Stories

The IIA 'tells the story' of the plan-making process - the IIA report should demonstrate:

How the reasonable alternatives were identified and assessed, why the preferred alternatives have been chosen, and why others were rejected;

What changes to the plan have been made as a result of the IIA;

What comments the statutory consultees and the public have made how these have influenced the policy.

For each policy this section provides a summary of how the policy was developed

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Flourishing Society

Healthy & Inclusive City

Topic	Healthy and Inclusive City -new chapter including mostly existing policies from different chapters.
<p>New policy Expecting development to positively address Well-building Standard, comfortable wind, sunlight and glare levels.</p>	<p>No Issues and Options.</p> <p>This new policy was included in this chapter to reflect the growing concern regarding environmental conditions in the City, particularly in the City Cluster which has seen significant development of very tall buildings in recent years and will need to accommodate large numbers of workers during the life of the Plan. The Development Management section have carried out modelling which can be used to determine safe and comfortable levels of wind, sunlight, solar glare and convergence in heavily built up areas.</p>
<p>Moved from Social and Community Infrastructure Chapter</p>	<p>1) Meet need for social and community infrastructure within the City.</p>
<p>Moved from Social and Community Infrastructure Chapter</p>	<p>2) Meet the need for social and community infrastructure by working in partnership with groups in neighbouring boroughs.</p>
<p>Moved from Transport Chapter</p>	<p>3) Should pedestrian and cyclist movements be prioritised?</p>
<p>Moved from Sustainable Development Chapter</p>	<p>4) Should we identify and encourage specific local measures to improve air quality, water quality, light pollution and contaminated land? If so, what should they include?</p>
<p>Moved from Open Spaces & Recreation Chapter</p>	<p>5) What type of recreational facilities are most needed in the City?</p>
<p>Draft Plan approach</p>	<p>The draft City Plan 2036 seeks to ensure new developments provide a healthy, comfortable and pleasant environment for workers, residents and visitors.</p> <p>The Plan will maximise opportunities for delivering services and facilities for the City’s communities by continuing to work in partnership with neighbouring boroughs to deliver accessible additional educational, health and community services and facilities.</p> <p>Policies encourage the reduction of motorised vehicles through road design and restrictions, and encourage non-motorised modes of transport.</p>

	<p>The Plan seeks to improve local air quality as well as ensuring development does not result in contaminated land or pollution of the water environment.</p> <p>The Plan will maximise recreational facilities in appropriate locations and encourage appropriate provision within major developments.</p>
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach at draft City Plan 2036 stage (Reg 18)
Evidence	<p>There are several documents that deal with how health and inclusiveness can meet the needs of City residents and workers.</p> <p>Four advice notes were produced in 2017 that include guidance on solar glare, sunlight, solar convergence and wind.</p> <p>City of London Solar Glare Planning Advice Note</p> <p>City of London Sunlight Planning Advice Note</p> <p>City of London Solar Convergence Advice Note</p> <p>City of London Wind Effects and Tall Buildings Advice Note</p> <p>The documents below recognise that there are limitations on the Corporation's ability to provide social and community infrastructure due to the small physical area, small residential population and excessively large working population of the City. All the documents below support working with providers in neighbouring boroughs to meet social and community needs. The Corporation of London also jointly funds and manages several academies in neighbouring boroughs to meet the educational needs of City residents.</p> <p>Health</p> <p>City of London Corporation Joint Health and Wellbeing Strategy (2017-20)</p> <p>City and Hackney Clinical Commissioning Group</p> <p>City and Hackney CCG Five Year Plan (2014-19)</p> <p>Childcare</p> <p>City of London Childcare Sufficiency Statement (2014-17)</p> <p>Education</p> <p>City of London Corporation Education Strategy (2016-19)</p>
Consultation	<p>There were 5 responses to issues and options question 17.4, with the majority (3) supporting greater cross boundary working in order to deliver efficient social and community services.</p> <p>10 people commented on the question of whether specific local measures to improve air, water and land quality should be identified and all agreed that local measures should be identified. Suggestions included reducing vehicle numbers, encouraging less polluting vehicles, increasing greenery and water</p>

	<p>run-off measures, enforcing stricter noise regulations and working with developers to include automatic light sensors in buildings.</p> <p>There were 14 people who responded to the question of outdoor open spaces and recreational facilities. The majority of responses were keen to see facilities such as seating, sheltered spaces, tables, good lighting and planting. The Barbican Association suggested that hard landscaping in large developments sited away from residential areas should include pitches for ball games.</p>
IIA	<p>Not all Issues and Options questions were assessed using the Integrated Impact Assessment process. Only the Strategic alternatives have been assessed.</p> <p>The IIA at the Issues and Options stage concluded that working with partners in neighbouring boroughs to meet the need for social and community infrastructure needs would be positive for economic growth as it would free up commercial premises in the City and would provide value for money for service users as cheaper provision would be possible in cheaper premises in neighbouring boroughs.</p> <p>The IIA concluded that local solutions to improve air, water and land quality and minimise noise and light pollution would be the most positive solution for the City, rather than relying on London-wide initiatives.</p>
Changes made as a result of IIA	None.
Regional and national guidance	<p>The NPPF addresses issues which help create a healthy City in several sections.</p> <p>Section 12 (Achieving well-designed places) advises that outdoor space should be designed to ensure environmental conditions are comfortable for users. Consideration should be given to levels of sunlight, wind, and solar glare.</p> <p>Paragraph 70 (Promoting Healthy Communities) promotes the sharing of social and community facilities space to deliver efficient services.</p> <p>Paragraph 180 (Ground conditions and pollution) seeks to prevent new development from adversely affecting soil, air, water or noise pollution.</p> <p>Paragraph 92 (Promoting Healthy and Safe Communities) states that local authorities should provide recreational facilities and services to meet the community's needs.</p> <p>The London Plan seeks to improve the health of people who live and work in London. Policy 3.2 (Improving health and addressing health inequalities) addresses a wide range of issues that can influence health outcomes, including designing spaces to maximise comfortable conditions in outdoor spaces, adequate social, community and recreational facilities and reducing air, water, light and land pollution.</p> <p>Additionally, policy (3.1) seeks the provision of efficient social and community infrastructure and services which work on a local as well as on a sub-regional basis.</p> <p>Accessible London</p>

	<p>Mayor's Accessible London SPG (2014)</p> <p>Play/health/education/cultural facilities Mayor's Social Infrastructure SPG (2015)</p> <p>Transport Mayor's Draft Transport Strategy (2017)</p>
Cross boundary issues	The City of London lacks the available land to provide all necessary social and community infrastructure. Traditionally there has been ongoing cooperation between Tower Hamlets colleagues and relevant Corporation officers to enable sharing of facilities and cross-funding for residents, particularly in the Mansell Street Estate, who have links with services in Tower Hamlets.
Conclusion	<p>The proposed Healthy City policies in the City Plan 2036 encourage cross boundary working between Corporation service providers and providers in neighbouring boroughs to deliver an efficient service. Consultees agreed that this co-operative approach was the most beneficial for the delivery of services. The IIA of the draft CS policy concluded that the proposed approach would have a beneficial impact.</p> <p>Policies are included in the chapter that encourage developments to consider how environmental factors can make outside spaces more pleasant for people to use, considering levels of sunlight and shade, wind, glare and also levels of pollution.</p> <p>The chapter encourages recreational facilities to meet the needs of workers, residents and visitors. Facilities are encouraged on the ground as well as in major developments, in recognition of the limited space on the ground in the City and the large numbers of workers in buildings.</p>
Date & Officer	Lisa Russell 22/08/18.
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes made between Reg 18 and Reg 19	<p>There was significant support and positivity concerning health policies, a reflection of the greater emphasis on health issues generally. Air quality was an issue that was raised, particularly how air quality could be improved in practice. The lack of space for community related health was commented on as well as how health could be considered more comprehensively when planning applications were being assessed.</p> <p>A new paragraph has been added at the end of the supporting text of Strategic Policy S1 which encourages major commercial developments to provide space which 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 on adequate community space being available.</p> <p>As a result of the growing awareness that health outcomes for residents, visitors, workers and students need to be improved, applicants proposing developments over 1,000sqm will be required to carry out a rapid health impact assessment and accordingly assess whether a full Health Impact Assessment is required.</p>

	<p>As a result of the growing recognition of the role air pollution plays in poor health outcomes, the existing policy on air quality was strengthened and updated to comply with changes in the London Plan.</p> <p>The London Plan and NPPF both increased the emphasis the problem of poor air pollution on people’s health, as did the City Corporation’s revised Air Quality Strategy.</p>
Date & Officer	Lisa Russell 05/02/20

Safe & Secure City

Topic	Safe and Secure City
Alternatives considered	1)Should the Plan promote or restrict night-time entertainment uses or look for ways to minimise the impact of night-time venues?
Alternatives considered	2) Should the Plan go further to protect against security threats and tackle anti-social behaviour?
Draft Plan approach	The draft City Plan 2036 commits the City Corporation to work with the City of London Police to ensure the City is secure from crime, disorder and terrorism. Security measures must be incorporated into development schemes, including public realm works.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach at draft City Plan 2036 stage Reg 18
Evidence	<p>The London Plan (2017):</p> <ul style="list-style-type: none"> - Policy 4.2 Offices - Policy 7.3 Designing out Crime - Policy 7.13 Safety, Security and Resilience to Emergency
Consultation responses	There were 16 responses to Issues & Options question 3.10 with over half (10) agreeing there is a need for clear dispersal routes. An equal number (4) of respondents thought that provision should be made for more night-time, and should be restricted. The GLA noted that the City’s excellent transport network provides an opportunity to offer an improved night-time economy. In response to Issues and Options question 3.11, five respondents agreed that natural surveillance, pleasant lighting and complementary adjoining uses would increase levels of safety and security. All of those who responded to Issues and Options question 3.12 (11) agreed that additional measures could be introduced to tackle crime and anti-social behaviour, of which five suggested the design of public spaces and buildings can take account of crime and anti-social behaviour.
IIA	<p>The IIA at issues and options stage concluded that whilst a balanced approach to promoting the night-time economy and protecting residential amenity would be difficult to police. Concentration of anti-social behaviour could arise but where areas of the City have been identified for night-time uses; this would be easier to police. Restricting night-time uses in identified areas could reduce anti-social behaviour and enable more efficient policing in the area.</p> <p>The IIA of the draft CS policy on security & safety found that the proposed approach was largely positive.</p>

Changes made as a result of the IIA	The IIA has made clear that the policies are strong in terms of promoting a safe and secure City supports its primary economic function, however careful consideration is needed to ensure there is access to all and that security measures do not negatively impact on any protected groups.
Regional and national guidance	National Planning Policy Framework (2018) : <ul style="list-style-type: none"> - Paragraph 95 (promoting public safety) - Paragraph 91 (promoting healthy communities) - Paragraph 110 (considering development proposals) - Paragraph 127 (achieving well-designed places) Home Office, CPNI, and NaCTSO: Guidance – protecting crowded places: design and technical issues
Conclusion	The proposed security and safety policy in the City Plan 2036 requires the City Corporation to co-operate with the City Police to ensure the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently. Development in the City should incorporate security measures into the design of schemes taking into account surrounding land uses.
Date & Officer	Therese Finn 08/08/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation</p> <p>There was support for the policy however there were queries around management of the night-time economy, impact of dispersal routes on residential areas and the definition of major development in requirement to conduct risk assessments.</p> <p>Additional evidence: The Safer City Partnership has published a strategic Plan 2019-2021 identifying various outcomes to keep the City safe and a Secure City Programme. Policy has been amended to reflect these outcomes and initiatives.</p> <p>Policy has been amended to enable S106 obligations to be submitted by developers to contribute towards measures to enhance collective security</p> <p>Policy amendment to require engagement with residents and occupiers regarding dispersal routes and noise nuisance.</p>
Date & Officer	Michelle Price 10/02/2020

Housing

Topic	Housing
Alternatives considered	<p><u>Housing numbers</u>:</p> <ol style="list-style-type: none"> 1) Plan to meet London Plan housing targets and not exceed them. 2) Plan to meet the level of need identified in the SHMA (125 units per annum). 3) Plan to significantly exceed London Plan housing target. <p><u>Housing location</u>:</p> <ol style="list-style-type: none"> 1) Restrict new housing to established residential clusters. 2) Permit housing anywhere in the City if site is unsuitable for office use.

	<p><u>Affordable Housing:</u></p> <p>1) Retain current affordable housing targets.</p> <p>2) Increase level of affordable housing required.</p>
Draft Plan approach	The City Plan 2036 seeks to meet the level of housing need identified in the SHMA. New housing will be encouraged to locate in existing residential clusters. Current affordable housing targets as per GLA guidance will be achieved.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text to terminology to ensure consistency with government guidance i.e new models of housing, details of housing activity outside the City and supporting text to support hostel provision for people who are homeless.
	Reason for preferred approach at draft City Plan 2036 stage
Evidence	<p>City of London Local Plan Monitoring Report – Housing (2017)</p> <p>This monitoring report demonstrates that the City’s housing trajectory has been achieved and that there is capacity for sufficient windfall housing to be achieved in future years. The location of housing was also monitored, and the report shows that generally new housing is being given permission to locate in and around existing identified residential concentrations.</p> <p>City of London Strategic Housing Market Assessment (2016)</p> <p>This study was commissioned to demonstrate the need for housing in the City and for specific types of housing, to meet the community’s needs.</p> <p>The 2017 London Strategic Market Housing Assessment</p> <p>The GLA carried out an assessment of housing capacity throughout London and allocated each local authority a housing target to achieve.</p>
Consultation responses	<p>There were 12 responses to the Issues & Options question regarding housing numbers, with the majority wanting the London Plan target to be exceeded, with only 2 respondents believing the targets should not be exceeded.</p> <p>19 people responded to the question about location of housing, with a small majority supporting residential development being permitted anywhere as long as the site is suitable and residential amenity is not compromised. 4 respondents (including the GLA) felt that the residential boundaries should receive greater emphasis. 3 respondents felt the current residential boundaries was adequate. There were 9 respondents to the question on affordable housing provision, with 5 people supporting the proposed increase in affordable housing and the rest feeling that increased affordable housing would be more appropriate outside the City using commuted sums.</p>
IIA	The IIA at issues and options stage concluded that any additional housing in London would contribute to alleviating pressure on existing housing stock, thereby assisting economic growth. However, excessive amounts of housing in the City could restrict the supply of land available for employment uses. Excessive housing could also result in an unsustainable demand for health and

	social services for residents, which could interfere with the efficient operation of the business City.
Changes made as a result of the IIA	None
Regional and national guidance	<p>National Planning Policy Framework (2018): Paragraphs 59-66 of the NPPF encourage the provision of adequate housing in areas, to meet local need, based on housing needs studies and five-year trajectories.</p> <p>Draft London Plan 2018 Policy H1 states that the City of London should develop 146 additional homes over the next 10 years.</p> <p>Affordable Housing and Viability SPG; Homes for Londoners (2017) This SPG encourages the development of affordable housing to meet local need.</p>
Cross boundary issues	The Corporation of London operates a policy of providing affordable residential units in neighbouring boroughs with money raised from cash-in lieu contributions. Housing colleagues work closely with neighbouring boroughs to facilitate this method of providing housing.
Conclusion	<p>The proposed housing policy in the City Plan 2036 requires the City Corporation to provide additional housing (including affordable) located in residential concentrations and where the functioning of the business City would not be compromised, in line with Government policy, other evidence documents, the IIA and public comments.</p> <p>The IIA of the draft CS policy on housing found that the proposed approach was largely positive.</p>
Date & Officer	Lisa Russell 15/08/18
	How we got to the Proposed Submission Plan
Reasons for the changes made between Reg 18 and Reg19	<p>There were not large numbers of comments on housing. The main issue raised was the restriction of where housing is located. There was a fairly even split between respondents, with arguments for allowing housing to be located throughout the City and the opposing view that new housing should be restricted to and near existing residential areas, to maintain residential amenity.</p> <p>To clarify the housing policies the term “over-concentration” has been removed throughout the Plan as cannot be defined. Also, wording was added to Policy H8: Older persons housing and the supporting text to emphasise the importance of enabling older people to be able to remain in their own homes.</p> <p>A commitment to deliver 50% affordable housing on public sector land was added to the housing policy, to conform with the London Plan policy approach.</p>

	The London Plan has strengthened the Mayor's commitment to maximising affordable housing provision in London.
Date & Officer	Lisa Russell 05/02/20

Thriving Economy

Offices

Topic	Offices
Alternatives considered	2) Protect an identified commercial core only
Alternatives considered	2) Continue to protect commercial floorspace throughout the City
Draft Plan approach	The City Plan 2036 does not identify a commercial core area and office floorspace is protected throughout the City of London.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification. The supporting text has been amended to further emphasise the sequential nature to the loss of office floorspace.
	Reason for preferred approach at draft City Plan 2036 stage (Reg 18)
Evidence	London Office Policy Review Office Floorspace Target Paper
Consultation responses	There were 23 responses to the question set out in the Issues and Options. 8 of those who responded supported a commercial core, with the GLA suggesting it should be clearly defined. 4 respondents objected to the commercial core as it would lack the flexibility required and could disrupt the commercial nature of the City. The whole City should be considered a commercial core.
IIA	The IIA found that both approaches held a lot of uncertainty but a blanket protection for commercial space across the City would have positive effects on the economic growth of the City, while an identified commercial core would be less certain.
Changes made as a result of IIA	None
Regional and national guidance	The Draft London Plan The minor amendments to the draft London Plan remove reference to a commercial core and state that residential development is not appropriate in 'defined parts' of the City of London and that office functions should be given greater weight in 'all areas' of the CAZ. National Planning Policy Framework The NPPF says that plans should take a positive approach to residential development in areas that aren't designated for other uses, where this doesn't undermine key economic sectors.
Conclusion	The whole of the City of London is a commercial area, and all sites that are suitable for development are suitable for commercial/office development. Areas more suitable for residential development within the City are identified as residential clusters.
Date & Officer	Michelle Price 05/02/20

	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes made between Reg 18 and Reg 19	<p>Consultation responses</p> <p>There was support for the planned growth in office floorspace and for the provision of flexible floorspaces to support small and medium sized enterprises however many thought further support was required for the provision of new, and protection of existing, low-cost business space.</p> <p>There have been a number of additional evidence documents to inform the office policies including:- COL Insight Paper – Business Location June 2019 Office for National Statistics BRES Data 2018 – Total Employment in the City 522,000 BRES Creative Industries Data 2018 – Employment in the City 41,000</p> <p>Most notably there has been an increasing demand from new types of occupiers and growth in serviced and co-working office market. Whilst there is no evidence that subsidised workspace is needed in the City, developers are encouraged to consider a range of leasing structures as per the London Plan.</p> <p>Policy wording amendment to acknowledge the increasing demand for new occupiers and growth in serviced and co-working office market may increase equality and inclusion.</p> <p>In light of changing economic circumstances which may impact on projected levels of office and employment growth and/or significant under/over delivery of the Plans employment targets, additional text in City Plan 2036 ‘What if things change’ to enable evidence to be updated</p>
Date & Officer	Michelle Price 06/02/20

Retail

Topic	Retailing
Alternatives considered	1) Continue to focus A1 retail uses in existing Principal Shopping Centres and other retail in Retail Links
Alternatives considered	2) Modify the number or role of Principal Shopping Centres (e.g. remove A1 priority in PSCs)
Alternatives considered	3) Consider retail development throughout the City adopting a site by site assessment
Draft Plan approach	Promoting the development of the four Principal Shopping Centres (PSCs) and the linkage between them in the Retail Links. Merging of the Moorgate PSC and Liverpool Street PSC to recognise development in this area of the City. Supporting proposals for the delivery of additional floorspace across the City and requiring major shopping developments to be located within or near PSCs. Seek to encourage retail and promote specialist retail uses and retail markets.

Proposed Submission version approach	<p>The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification. The supporting text has been amended to acknowledge the changing retail demand for leisure and entertainment uses.</p> <p>Reason for preferred approach at draft City Plan 2036 stage (Reg 18)</p>
Evidence	<p>There are several documents that deal with retailing to meet the needs of City residents and workers.</p> <p>Retail Needs Assessment Study (November 2017)</p> <p>This study assessed the existing and future retail provision within the City up to 2036, considering new retail floorspace in both the Principal Shopping Centres (PSCs) and other areas of the City and provide advice on future retail trends. The study suggested merging the current two PSCs of Moorgate and Liverpool Street into one decreasing the overall number of PSCs from five to four.</p> <p>Development Information (May 2019)</p> <p>Updated bi-annually this report gives an overview of development activity in the City. Section 5 covers retail development analysing net floorspace completed, the net pipeline, and spatial distribution of development activity.</p>
Consultation	<p>There were 10 responses to issues and options for both question 7.5 and 7.6. The majority of respondents were supportive of retaining the PSCs however there was suggestions to see a new PSC in the Farringdon area. Four respondents were in favour of prioritising A1 units in PSCs however two respondents did not support this as would prefer to see diversification of business types. In regards, to the Retail Links three respondents would like to see them retained and there was a suggestion of a new link north of the Liverpool Street PSC.</p>
IIA	<p>The IIA at issues and options stage concluded that there would be positives in Alternative 1 and 2 for PSCs and Retail Links. Focussed retail provides a number of opportunities, for collective climate mitigation and resilience measures, suitable open spaces for shoppers and PSCs provide a vibrant social environment. However Alternative 3 to consider retail development throughout the City would weaken the role of PSCs and dispersed retail would impact on transport, housing, servicing, security and policing.</p> <p>The IIA of the draft CS policy on Retailing found that the proposed approach was largely positive however waste management for the specialist retail uses and markets had a significant negative impact, so the wording has been changed to include waste management facilities in the retail supporting text to help businesses reuse/reduce packaging waste.</p>
Regional and national guidance	<p>The NPPF promotes the vitality of town centres through Chapter 7 and recognises that planning policies and decisions should support the role town centres play at the heart of local communities.</p> <p>The London Plan advises planning departments to provide a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services, particularly for town centres and identify future</p>

	<p>requirements and locations for new retail development (See Policy 4.7 Retail and town centre development and Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services). The London Plan recognises that the PSCs are CAZ retail clusters.</p> <p>The GLA <u>Town Centres SPG</u> supports the evolution and diversification of town centres and the GLA's <u>High Streets for All</u> is a study of today's high street.</p>
Conclusion	<p>The proposed retail policy in the City Plan 2036 proposes that retail environment will be improved promoting the development of the four Principal Shopping Centres (PSCs) and the linkages between them as set out in draft CS policy and Alternative 1 and Alternative 2. There is a growing demand from developers for mixed commercial uses and changing retail trends have impacted on predominance of A1 shop frontages. The IIA of the draft CS policy concluded that the proposed approach would have a beneficial impact.</p>
Date & Officer	John Harte 10/02/20
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes made between Reg 18 and Reg 19	<p>Consultation responses - There was several comments on retail including:</p> <ul style="list-style-type: none"> • General support from the business community for additional retail floorspace • However, some members of the public questioned why further space is required when nationally the retail market is changing • A recognition of the importance of leisure activities and experiential retail uses within the City and the need to move towards an evening economy and 7-day week trading • Many business respondents considered that there should be more flexibility to enable use of vacant A1 units <p>Policy amendments: Pedestrian permeability, public realm and quality-built environment were stated as important to maintain healthy retail footfall. Policy wording amendment to acknowledge the changing retail demand for leisure and entertainment uses (with active frontages) which can add value to the overall retail mix and the visitor experience. Minor wording changes to clarify floorspace targets and encouraging further A1 development (especially in the PSCs). Additional wording that A1 uses (convenience stores) are located within walking distance to residential areas that serve the needs of residents. Also, that all proposals for change of use in the Retail Links will be required to incorporate active frontages at street level. Finally, additional wording on Markets (Policy R5) which would be permitted where they would not involve the permanent loss of open space or harm the character of that space. Refinement to the Retail Map due to some minor changes to Retail Links.</p>
Date & Officer	John Harte 11/02/2020

Culture, Visitors and Night-time Economy

Topic	Culture, Visitors and Night – time Economy
Alternatives considered	1)Should hotel development be guided to and allowed in particular locations?
Alternatives considered	2)Should a target be set for numbers of new hotel developments.
Alternatives considered	3) Should business accommodation be prioritised over leisure accommodation?
Alternatives considered	4) Should activities be encouraged that attract visitors to the City?
Draft Plan approach	The draft Plan encourages visitor accommodation for both business and leisure visitors and encourages activity on the street. Hotels are encouraged to locate in areas where the business City will not be adversely affected. There is no target set for hotel development. Policy has been added in the Plan which seeks to ensure facilities in open spaces and the public realm cater for the needs of people, including visitors.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarity. Text in policy on inclusive hotel bedrooms has been amended to be consistent with government guidance.
Reason for preferred approach at draft City Plan 2036 stage (Reg 18)	
Evidence	An analysis was carried out in 2017 by the Policy and Performance Team which analysed the predicted hotel development in the City, using data from the GLA. The analysis concluded that the City hotel pipeline would deliver units in line with GLA guidance.
Consultation responses	<p>12 people responded to the question on the location of hotel development. The majority of respondents supported hotel development and felt they should be concentrated near transport hubs, near visitor attractions and where there is adequate space for taxi movements and servicing. The GLA supported hotel development as long as the other functions of the CAZ were not compromised.</p> <p>Five (all) people responded that there should not be a target for hotel bedroom numbers.</p> <p>Eleven people responded to the question of whether business accommodation should be prioritised over visitor accommodation. The majority felt hotel accommodation should cater for both leisure and business visitors.</p> <p>There were 17 people who responded to the question on encouraging activities to attract visitors. The vast majority agreed that activities should be encouraged, such as; public art, seating, pedestrian routes, toilets, and catering facilities.</p>
IIA	The IIA concluded that there would be positives in all the four alternatives, but that options which designated areas spatially where hotels would be

	acceptable would allow protection of offices and greater opportunity to minimise adverse amenity and environmental impacts.
Changes made as a result of IIA	During the IIA process examining how decisions should be made as to locating new hotel development, it became apparent that the existing policy did not mention the protection of historic buildings as a criterion for allowing hotel development. Wording has been added to the hotel policy in the Draft Local Plan which includes the protection of historic buildings as a criterion for allowing hotel development.
Regional and national guidance	The London Plan (Policy 4.5) seeks to support the visitor economy and stimulate its growth, considering the needs of business as well as leisure visitors. Aiming for 40,000 additional hotel bedrooms by 2036. The GLA document Culture and the Night-time Economy SPG (2017) promotes visitors and culture to improve London's economy.
Conclusion	The Local Plan policy on hotels and visitors is in line with the option which seeks to continue to apply a criteria-based approach to new hotels and allow hotel development if it is not harming the business City. Wording was added, as a result of the IIA process, to include protection of historic assets as a reason for allowing hotel development. The options to specifically direct hotel development were debated but it was felt a less specific approach would allow more flexibility and allow hotel development in appropriate areas throughout the City.
Date & Officer	Lisa Russell 29/08/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for the changes made between Reg 18 and reg 19	There were not significant numbers of comments on this topic. There has however been a growing recognition generally within the City Corporation of the importance of culture, due to the launch and development of Culture Mile, centred around the Barbican. Wording was added to Policy C4: Evening and Night-Time Economy to specify that waste must be considered in new proposals for evening and night-time entertainment and related uses. A new requirement for applicants submitting proposals over 1000 sqm to produce a Cultural Strategy has been added to reflect the Mayor's recent emphasis on the importance of cultural activity, as well as the Corporation of London's focus on the Culture Mile. Wording has been added to emphasise that increased cultural activities should not disturb biodiversity in open spaces. Wording has also been added to specify that proposed cultural facilities should be open to the public. The Mayor has increased the policy emphasis in the Plan and issued additional guidance on culture as an economic driver in London and the contribution the night-time economy makes to London's Cultural sector.
Date & Officer	Lisa Russell 05/02/20

Smart Infrastructure & Utilities

Topic	Smart Infrastructure and Utilities
Alternatives considered	1) Prioritise new utilities infrastructure according to strategic demand instigating a more collaborative approach to implementation and funding
Alternatives considered	2) Promote infrastructure improvements associated with each site in line with current planning policy
Draft Plan approach	The preferred approach aims to minimise overall demands on the City's utility infrastructure, promoting engagement with utility providers and prioritising collective infrastructure, route sharing and communal connection points.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach at draft City Plan 2036 stage (Reg 18)
Evidence	Zero Emissions Report AECOM Thames Water Business Plan 2020-2025
Consultation responses	Number of comments: 9 There was support for a more strategic and collaborative approach to infrastructure provision in order to ensure the City's resilience, including from the CPA. The GLA highlighted the importance of taking a long-term view of the needs of various utilities as well as measures to reduce the demands of new development on such infrastructure.
IIA	The IIA assessment at issues and options stage favoured a strategic approach to utility infrastructure
Changes made as a result of IIA	The potential impact of utilities infrastructure on heritage assets has been included in the supporting text.
Regional and national guidance	NPPF – section 10 states that policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. London Plan identifies the need to ensure that suitable infrastructure is in place to support growth.
Conclusion	Utilities and smart infrastructure in the City will continue to be managed to support long-term demand.
Date & Officer	Alanna Coombs 12/12/19
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for the changes made	Consultation responses There was support for engagement with infrastructure providers and increasing digital connections, coupled with requirement to meet

<p>between Reg 18 and Reg 19</p>	<p>sustainability standards and mitigate against loss of signals posed by tall buildings.</p> <p>MHCLG consulted Q3/Q4 2019 on extending Permitted Development rights for mobile infrastructure to support deployment of 5G and extend mobile coverage. City Plan policy has been amended to the support the roll out of 5G which will require additional infrastructure in the public realm and/or on buildings.</p> <p>The London Plan (as amended 2019) seeks to mitigate detrimental impacts to mobile connectivity as a result of development which has also been reflected in the City Plan policy</p> <p>To enable evidence to be updated in light of changing technology additional text in City Plan 2036 'What if things change' has been inserted as spatial strategy.</p>
<p>Date & Officer</p>	<p>Michelle Price 06/02/20</p>

Outstanding Environments

Design

Topic	Design
Alternatives considered	1) Maintain existing design policies from previous Local Plan
Alternatives considered	2) Additions and moderations to design polices
Draft Plan approach	The draft City Plan 2036 makes alterations to the existing design polices and adds a policy regarding sustainability standards.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification i.e emphasising that design solutions to the problem of damage by skateboarders should be robust, sustainable and made from low carbon materials.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	GLA design documents. National guidance on design. Planning conservation area papers and public realm documents.
Consultation responses	There were 14 responses to the design question in the Issues and Options. 5 respondents wanted policy that had a greater impact on the massing of buildings as there is little coherent identity in the City. There was support for making little change to the existing polices also.
IIA	The IIA identified that the Daylight and Sunlight policy will have a negative impact on economic growth. There were no other negative impacts in the IIA.
Changes made as a result of IIA	Daylight and Sunlight policy changed to reflect the urban nature of the City of London.
Regional and national guidance	<p>Draft London Plan</p> <p>The Draft London Plan has a chapter dedicated to Design and states that good design and good planning are intrinsically linked. The Plan gives detail guidance that is to be applied across London which doesn't need to be duplicated in the City Plan 2036.</p> <p>National Planning Policy Framework</p> <p>The NPPF sets out that good design is a key aspect of sustainable design and creates better places. It states that plans should set out clear design visions and expectations.</p>
Conclusion	The design policies remain largely unchanged from the previous local plan. Sustainability standards has been added into the policy in order to increase its visibility and reflect that It achieving high sustainable standards is integral to the design of a building.
Date & Officer	Lewis Claridge 02/02/18

	How we got to the Proposed Submission Plan (Reg 19)
Reason for the changes made between Reg 18 and Reg 19	<p>Consultation responses</p> <p>There were numerous comments, raising questions of the quality of design and pedestrian permeability.</p> <p>The Mayor of London has indicated that guidance on daylight and sunlight standards will be produced to support the London Plan. To enable evidence to be updated in light of changing circumstances additional text in City Plan 2036 'What if things change' has been inserted as spatial strategy.</p> <p>The London Plan seeks to reduce emissions and moving towards zero emissions and zero carbon city by 2050 and policy wording has been altered minorly to reflect.</p> <p>Policy has been amended to include reference to the cultural experience of the city public realm, the need to provide a high quality safe and functional public realm and inclusive design that meets the needs of different users.</p> <p>Policy has been amended to incorporate provision of legible pedestrian connections and new pedestrian routes through buildings where feasible and undertaken a block size analysis to prioritise new routes</p> <p>Policy includes reference to A boards to ensure that pavements are kept clear of obstructions.</p>
Date & Officer	Michelle Price 06/02/20

Topic	Sustainable Design
Alternatives considered	1) Assist developers to achieve zero carbon by strategic planning for energy
Alternatives considered	2) Continue the current practice of site by site energy planning
Draft Plan approach	The proposed approach continues the current practice of site by site energy planning
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach at draft City Plan 2036 stage (Reg 18)
Evidence	Zero Emissions Study AECOM for the City Corporation July 2018 demonstrates that decarbonisation of grid electricity will be more important than local district heat networks in reducing the City's carbon emissions. Therefore a site by site approach which moves towards heat pumps may be as effective as a more strategic approach.
Consultation responses	The majority of respondents (9) supported positive planning to enable a more sustainable, low carbon future City. There was specific support for district heating and smart grid technologies

IIA	The IIA at Issues and Options stage showed more positive impacts from a strategic approach to energy planning
Changes made as a result of IIA	None
Regional and national guidance	The draft London Plan includes targets for carbon emission reduction on a site by site basis.
Conclusion	A strategic approach to energy planning is covered through the Utilities and Smart Infrastructure Policy. The Design Policy concentrates on a site by site assessment of energy, carbon emissions and sustainability.
Date & Officer	Janet Laban 19/09/18

How we got to the Proposed Submission Plan (Reg 19)

Reasons for the changes between Reg 18 and Reg 19	The London Plan seeks to reduce emissions and moving towards zero emissions and zero carbon city and policy wording has been altered minorly to reflect.
Date & Officer	Janet Laban 02/02/20

Transport

Topic	Transport
Alternatives considered	1) Site by site approach to transport and public realm
Alternatives considered	2) Local Plan strategic approach to transport and public realm
Alternatives considered	3) Prioritise public transport
Alternatives considered	4) Prioritise pedestrian and cycle movement
Alternatives considered	5) Manage vehicle movement through restrictions and consolidation centres
Draft Plan approach	The Draft Plan has separate sections on vehicular transport and servicing, and walking, cycling and Healthy Streets. It places an emphasis on delivering the Mayor's Healthy Streets Approach through prioritising walking and cycling and restricting non-essential traffic. It supports improvements to public transport capacity, mainly regarding the rail and underground network, and it proposes to manage freight and servicing on an area-wide basis through the use of physical and virtual consolidation and retiming of deliveries outside peak periods.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarity. Text in policy has been amended to seek provision to be made for the storage of vehicles and equipment for zero emission and last mile delivery vehicles.
	Reason for preferred approach at draft City Plan 2036 (Reg 18)
Evidence	The draft Plan has been prepared alongside the City Corporation's draft Transport Strategy, with both documents due to be published for consultation at the same time. The Transport Strategy itself is underpinned by a range of survey data, including the Traffic in the City report (Feb 2018).
Consultation responses	There were several consultation questions relating to transport issues at the Issues and Options stage:

	<ul style="list-style-type: none"> • There were 16 responses to a question about what actions the City Corporation could take to reduce congestion in the City. A wide range of suggestions were made, including: banning private cars during normal working hours; making all other vehicles zero emission; reviewing delivery times; improving public transport; encouraging walking and cycling; increasing car parking charges; better use of existing car parking for alternative uses; and enforcement of the 20mph speed limit. • 12 responses were received to a question about off-peak deliveries, with the majority of respondents welcoming this idea (including at night-time). There were some concerns expressed about potential impacts on residential amenity and on the flexibility of the commercial sector. • There were 16 responses to a question about whether consolidation centres should be promoted, with a clear majority of respondents (14) agreeing in principle with the need for consolidation. • 16 responses were received to a question about the impact of motor vehicle traffic on air quality, with general support for the promotion of electric vehicles and the need to provide charging points in accessible locations. • There were 13 responses to a question about how more space can be created for pedestrians. A majority of respondents supported restrictions on vehicle movements, generally favouring restrictions at peak times or the narrowing of roadways to provide more space. • 10 respondents commented on cycle parking in new developments, with half calling for increased levels of cycle parking and the other half generally content with the existing standard. • Seven responses were received to a question about motorcycle parking, with the majority feeling that no more space is required and that this should not be seen as a priority.
IIA	<p>At the Issues and Options stage, the site by site approach to transport and the public realm resulted in lots of uncertain impacts, whereas the Local Plan strategic approach was identified as having generally positive impacts, albeit still with some uncertainties.</p> <p>The options for prioritising public transport, prioritising pedestrian and cycle movement, and managing vehicle movement were all identified as having mainly positive impacts. In the case of pedestrian and cycle movements, these were largely local impacts whereas for the others some regional impacts were identified.</p> <p>None of the reasonable alternatives were assessed as having any outright negative impacts, although for some criteria both positive and negative impacts were identified.</p> <p>At the draft Plan stage, the vehicular transport and servicing policies were assessed as having a mix of positive and uncertain impacts, with some criteria scoring both positively and negatively. The main uncertainties related to the potential impacts of consolidation centres within other boroughs and how they might affect overall travel patterns. The policies on walking, cycling and Healthy Streets were generally assessed positively, with a small number of uncertainties or positive/negative impacts.</p>
Changes made as a result of IIA	None. A clear monitoring framework was recommended in relation to assess the impact of consolidation centres. A monitoring framework will be

	<p>incorporated into the next stage of the Local Plan before it is submitted to the Secretary of State. Minor additions to the text were also recommended by the IIA in relation to greening, climate resilience and folding bikes and scooters. The references to greening and climate resilience have not been added because these issues are extensively covered elsewhere in the Plan.</p>
Regional and national guidance	<p><u>National Planning Policy Framework (2018)</u> Paragraphs 102-111 set out policy guidance on transport issues and indicate that the planning system should actively manage patterns of growth in support of objectives to promote sustainable transport.</p> <p><u>London Plan 2016/Draft London Plan 2018</u> The adopted London Plan includes a range of transport policies to support integration of transport and development, connecting London and ensuring better streets. It incorporates car and cycle parking standards. The draft London Plan likewise includes a range of transport policies, aimed at supporting delivery of the Mayor's strategic target of 80% of all trips in London being made by foot, cycle or public transport by 2041.</p> <p><u>Mayor's Transport Strategy 2018</u> The Mayor's Transport Strategy sets out the Mayor of London's policies and proposals to reshape transport in London by transforming the Capital's streets, improving public transport and creating opportunities for new homes and jobs. To achieve this, the Mayor wants to encourage more people to walk, cycle and use public transport, and to promote the Healthy Streets Approach.</p>
Cross boundary issues	<p>By their nature, transport networks cross administrative boundaries and the City's role as a global financial and professional services centre means that it attracts trips across a very wide area. The vast majority of these trips are by sustainable transport modes and new development in the City is car-free except for designated Blue Badge spaces. The main cross-boundary issue is delivery and servicing trips; proposals for freight consolidation are likely to have both positive and negative impacts, but the precise impacts are uncertain because specific sites have not yet been identified.</p>
Conclusion	<p>The proposed policies in the draft Local Plan reflect national and regional guidance, particularly the Mayor's Healthy Streets Approach; are aligned with the City Corporation's draft Transport Strategy; and reflect the views expressed by the majority of respondents at Issues and Options (albeit a limited sample).</p> <p>The IIA undertaken at Issues and Options explored all the key issues for the City, but most of the reasonable alternatives identified at that stage were not mutually exclusive. Indeed, some of them were inter-dependent. For instance, prioritising pedestrian and cycle movements (alternative 4) is arguably only deliverable if vehicles are more actively restricted (alternative 5). The policies in the draft Plan are consistent with reasonable alternatives 2-5, with a particular emphasis on 4 and 5.</p>
Date & Officer	Adrian Roche 02/10/2018
	How we got to the Proposed Submission Plan (Reg 19)

Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses</p> <p>There was support for the policy to minimise road danger and congestion and reduce vehicle emissions. A number of respondents were opposed to reducing vehicles access in the City. Support for reducing servicing and delivery trips however concern as to how consolidation would work in practise. Support for walking and cycling improvements.</p> <p>Additional evidence: COL Transport Strategy 2019 and policy wording has been amended to reflect alignment</p> <p>A number of policy amendments have been made including:-</p> <ul style="list-style-type: none"> • further promotion delivery by foot and/or bicycle • supporting TFL improvements to underground and DLR and step free access, • how the construction logistics plan will manage vehicles in line with the need to Reduce, Re-time and Re-mode. • to ensure servicing areas are equipped with EV charging • support for freight innovation and work to provide a consultation service for the City • requirement to deliver and servicing plans for all major development over 1000sqm
Date & Officer	Michelle Price 10/02/20

Historic Environment

Topic	Historic Environment
Alternatives considered	1) Protect only designated heritage assets and their settings
Alternatives considered	2) Protect designated and non-designated heritage assets and their settings
Draft Plan approach	The draft City Plan 2036 sets out that designated and non-designated heritage assets and their settings should be protected.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes including additional wording <u>on the protection of designated and non-designated heritage assets.</u>
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	Land Use of Listed Buildings in the City of London Evidence showing that listed buildings within the City of London are largely in use as commercial property and make a contribution to the primary business function of the City of London.
Consultation responses	Question 5.6 in the Issue and Options received 12 comments. These were a mixture of support or opposition for protecting non-designated heritage assets. Historic England supported the City's commitment to an Historic Environment SPD. The Conservation Area Advisory Committee commented that non-designated assets can be problematic as they mean different things to different people.
IIA	The IIA carried out at the Issues and Options stage concluded that protecting the setting of non-designated heritage assets would be beneficial for the

	historic environment in the City of London. It could however have a negative impact on the economic viability of the City as overly constraining policies could hamper economic development. It was noted that there were potential negative implications for the public realm also, due to restrictions on development close to non-designated heritage assets.
Changes made as a result of IIA	None
Regional and national guidance	<p>National Planning Policy Framework</p> <p>The NPPF says greater regard should be given to more important heritage assets, and significance can be harmed through development in their settings.</p> <p>Draft London Plan</p> <p>Policy HC1 refers to both designated and non-designated heritage assets contributing to London’s status as a world class city.</p>
Conclusion	The policy approach is to protect designated and non-designated heritage assets as set out in option 2, as this brings City of London policy in line with the London Plan and NPPF.
Date & Officer	Jonathan Blathwayt 02/02/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses – There was several comments on the historic environment including:</p> <ul style="list-style-type: none"> • Support for the policy to positively manage heritage assets, but many felt that the wording should better reflect NPPF guidance and reference designated and non-designated heritage assets <p>Business respondents considered that the public benefit of city growth ought to be considered when considering substantial harm to heritage assets</p> <p>Policy amendments:</p> <p>Policy wording amendment to acknowledge Historic England’s ‘Heritage at Risk Register’ and to encourage proposals to achieve the conservation and appropriate use of buildings and monuments listed. Minor wording changes in recognition of enhanced experience, interpretation and inclusive access of the City’s cultural and heritage assets. Additional wording added to Policy HE1 <u>on the protection of designated and non-designated heritage assets and further information on World Heritage sites (Tower of London)</u> in line with national policy.</p>
Date & Officer	John Harte 11/02/2020

Tall Buildings & Protected Views

Topic	Tall Buildings and Protected Views
Alternatives considered	1) Promote tall buildings in the existing eastern cluster only
Alternatives considered	2) Protect additional views

Alternatives considered	3) Allow tall buildings in appropriate locations outside of strategic viewing corridors and St Paul's Heights elsewhere in the City
Draft Plan approach	The draft plan will allow tall buildings in appropriate locations where they met other environmental, design and other related policies. The draft plan will also formalise the view of St Paul's from Fleet Street.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach in draft City Plan 2036 (Reg18)
Evidence	Tall Buildings Info London Views Management Framework Supplementary Planning Guidance Draft London Plan
Consultation responses	There were 25 comments on this topic, with most in support of the City's approach to clustering tall buildings within the Eastern Cluster. There is support for protecting heritage assets from tall buildings nearby as it can harm their setting.
IIA	The IIA at Issues and Options stage identified that protecting additional views could have a detrimental effect of the economy of the City as it would potentially restrict additional tall buildings and the large amount of office floorspace they can provide in a small area. Allowing further views was seen to have positive impacts on a range of other areas. It was felt a policy that allowed tall buildings in appropriate areas where they didn't have negative impacts on their surrounding environment was the most positive for the economy.
Changes made as a result of IIA	A local view of St Paul's Cathedral from Fleet Street is designated in the policy, the view is deemed to have minimal impact on the economy as it would not remove the potential for tall buildings in most areas of the City. The view would also give significant protection to St Paul's Cathedral a nationally important heritage asset.
Regional and national guidance	Draft London Plan Policy D8 in the draft London Plan sets out the criteria for appropriate locations when permitting tall buildings NPPF Paragraph 122 states that LPAs should make efficient use of land considering surrounding character and setting, infrastructure capacity and the availability of land suitable for development. London Views Management Framework Supplementary Planning Guidance This sets out the protected views across London and the areas that are inappropriate for tall buildings.
Conclusion	The tall buildings and protected views policy will allow tall buildings in appropriate locations as long as they have no significant detrimental impacts on their local environment and are in line with all other policies in the plan. Tall buildings are promoted in the City Cluster as this is the area most suited for their development within the City of London.

Date & Officer	Lewis Claridge 07/09/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation Responses</p> <p>Widespread support for the protection of views however many heritage bodies did not think policy was clear enough to protect the Cathedral and Processional Route. Many respondents had concerns regarding the areas inappropriate for tall buildings, the height definition of tall buildings in comparison to neighbouring boroughs, design of tall buildings particularly in the eastern edge of the City Cluster affecting the Tower of London and requirement for publicly accessible open space.</p> <p>Developers and COL are increasingly using 3D modelling technology as a tool to provide visual assessment of tall building proposals and additional text seeks developers to submit virtual models for assessment.</p> <p>COL introduced Wind Climatic Guidelines in August 2019 to assess microclimate and thermal comfort impacts of tall buildings and further text in policy requests assessment as part of planning proposals.</p> <p>Refinements to the policy and associated maps to further recognise the Tower of London in the east of the city as inappropriate for tall buildings and Fleet Street to recognise the Processional route and silhouette of St Paul's Cathedral.</p> <p>Growth in supply of roof terraces at upper floor levels have given rise to provision of free to enter, publicly accessible areas to provide amenity of occupiers, visitors and the wider public. Refinements to policy wording ensures this provision.</p>
Date & Officer	Michelle Price 06/02/20

Open Space & Green Infrastructure

Topic	Open Space & Green Infrastructure
Alternatives considered	1) Protect all existing open space
Alternatives considered	2) Allow development on some open space
Alternatives considered	3) Require additional open space to be provided with development
Draft Plan approach	The draft City Plan 2036 seeks to promote a greener City through protection of existing open spaces, measures to enhance biodiversity and creating and maintaining a high-quality green infrastructure. Maximise opportunities to for delivering open spaces and green infrastructure for the City's communities and help to mitigate against some effects of climate change, provides benefits for well-being and mental health and improve air quality. The Open Spaces and Recreation policy and the DM policy on biodiversity and urban greening have been merged into one draft CS policy. This policy makes provision of urban greening, so it is integral to the design and layout of the building and public realm and promote the development of the Urban Greening Factor (UGF). This has come about as a result of the policy in the draft London Plan,

	and the evidence study the City of London commissioned to encourage more greenery.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. A new policy on trees has been added, further information on biodiversity net gain and there have been minor wording changes to the text.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	<p>There are several documents that deal with open spaces and green infrastructure to meet the needs of City residents and workers.</p> <p>Urban Greening Factor Study (July 2018) The purpose of the UGF study was to establish the appropriate level for an Urban Greening Factor (UGF) for the Square Mile for inclusion in the City of London Local Plan. It identified the appropriate amount of urban greening and established that a target score of 0.3 for commercial and residential development can realistically and viably be achieved for major developments in the Square Mile. The City is aspiring to achieve an ambitious and radical policy approach to urban greening by further greening of buildings, roof spaces, terraces, and the public realm.</p> <p>City of London Local Plan Monitoring Report Green Roofs (December 2019) The purpose of the green roof report is to monitor the delivery of green roofs in the City of London to assess delivery and inform review of policies relating to green roofs set out in the City of London planning framework. City of London Local Plan Monitoring Report – Open Spaces and Recreation (October 2018) The purpose of this document is to review the delivery of new open space delivered in the context of the City of London Local Plan.</p> <p>City of London Open Spaces Audit (April 2019) The purpose of this two-part document is to provide an audit of open spaces in the City of London to assist with the review of the City of London Local Plan, setting out, for the City of London’s open spaces.</p> <p>The City of London Biodiversity Action Plan 2016-2020 (April 2016) Includes a habitat action plan for built structures, which encourages the incorporation in development of wildlife-friendly features such as green roofs. Information on biodiversity in the City, target species and Sites of Importance for Nature Conservation (SINCs).</p>
Consultation	There were 15 responses to issues and options for question 7.2. The majority of respondents were supportive of greenery to be given priority in open spaces. The reasons respondents gave were that urban greening would include relaxation, mitigating the impacts of pollution and climate change, and assisting biodiversity. Four respondents felt that a mixture of hard and soft landscaping should be provided and one commented that planning policy should not be prescriptive in terms of what should be sought in new open spaces. Six respondents suggested that developers should be required to maintain public open spaces within their site boundaries.

IIA	<p>The IIA at issues and options stage did not include a specific option about Green Infrastructure/City Greening as it has evolved due to policy changes in the draft London Plan and the evidence study commissioned on the Urban Greening Factor (UGF). The IIA did conclude that there would be mostly positives in Alternative 1 and Alternative 3 for protection of all existing open space and additional open space to be provided with developments. Existing open space provides opportunity for air quality improvement, climate mitigation & resilience and biodiversity. It provides pleasant walking routes, and opportunities for social interaction with health benefits. However Alternative 2 on allowing development on some open space had the potential to reduce the attractiveness of the City and may affect historic parks and gardens or settings of historic buildings.</p> <p>The IIA of the draft CS policy on Open Spaces and Green Infrastructure found that the proposed approach was largely positive with some proposed mitigation suggested to improve policy.</p>
Regional and national guidance	<p>The <u>NPPF</u> promotes healthy and safe communities through Chapter 8 and recognises the importance of open space and recreation and green infrastructure provision.</p> <p>The <u>London Plan</u> supports the creation of new open space in London (Chapter 7, Policy 7.18) and the Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure (Chapter 2, Policy 2.18)</p> <p><u>The draft London Plan</u> includes in Chapter 8 (Green Infrastructure and Natural Environment), Policy G1 (Green Infrastructure), Policy G4 (Local green and open space) and Policy G5 (Urban Greening) which includes information on the Urban Greening Factor (UGF).</p>
Conclusion	<p>The proposed Open Space and Green Infrastructure policy in the City Plan 2036 will protect and increase public access to existing open and green space, create, maintain and encourage green infrastructure. It is proposed the use of the Urban Greening Factor (UGF) tool will deliver additional greening in the City.</p>
Date & Officer	John Harte 10/02/20
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses – There was several comments on green infrastructure and open spaces including:</p> <ul style="list-style-type: none"> • Support for additional greening, including the provision of more open space and amenity provision for both workers and residents, and improvements in biodiversity • Concern from developers about the feasibility, deliverability and impact of viability of providing more greening on buildings, as opposed to around buildings • Support for policies which seek to go further and deliver improvements in biodiversity across the City • Requests for specific policy protection for trees and additional tree planting

	<p>Policy amendments: Wording added that additional open space should be recognised at both street level and higher levels through the provision of accessible roof gardens/terraces. Additional wording added to Policy OS2 on the loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances and that green infrastructure should be maintained for the life of the building. Further information provided in Policy OS3 on biodiversity net gain and lighting on schemes should be designed to minimise impacts on biodiversity. A new Policy OS4 on trees to seek to increase the number of trees and their overall canopy area.</p>
Date & Officer	John Harte 11/02/2020

Climate Resilience & Flood Risk

Topic	Climate Resilience and Flood Risk
Alternatives considered	1) What type of climate resilience measures should be incorporated and how should they be secured?
Alternatives considered	2) Should SuDS requirements apply to all development or just Major development?
Alternatives considered	3) Should we require flood resistance and resilience measures for development in the City Flood Risk Area?
Draft Plan approach	<p>Overheating, urban heat island effects and flood risk are identified as the main climate risks to be addressed in development proposals at the planning application stage.</p> <p>SuDS principles must be incorporated into the design of all development, transportation and public realm proposals.</p> <p>All development in the City Flood Risk Area must incorporate flood resistance and resilience measures</p>
Proposed Submission Plan approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. Minor changes have been made to the supporting text for clarification and to align with new Environment Agency guidance.
	Reason for preferred approach at draft City Plan 2036 stage (Reg 18)
Evidence	<p>UK Climate Projections provide evidence of probability of changes in rainfall and temperature over the next century.</p> <p>City of London Strategic Flood Risk Assessment 2017 provides evidence of the flood risks faced in the City and proposes mitigation, resistance and resilience measures to reduce the likelihood and impact of flooding.</p>
Consultation responses	<ul style="list-style-type: none"> • Most respondents were in favour of climate resilience measures including SuDS, green infrastructure, wind mitigation and temperature control measures. Respondents suggested that resilience should extend to cover transport, ICT and public realm some of which could be funded through CIL • Most respondents were in favour of SuDS requirements being applied to all development subject to feasibility and viability considerations. Respondents suggested that the City's SFRA should propose suitable SuDS for the City's high density urban environment.

	<ul style="list-style-type: none"> All respondents were in favour of flood resistance and resilience measures being incorporated into development in the City Flood Risk Area.
IIA	<p>The IIA identified mainly positive impacts however it was unclear whether all heritage assets would be considered in the design of SuDS and flood defence infrastructure.</p> <p>The wording has been changed to include archaeological and other heritage assets as considerations in the design of SuDS and flood defences.</p>
Regional and national guidance	<p>NPPF Section 10 <i>Meeting the challenge of climate change, flooding and coastal change</i></p> <p>Planning Practice Guidance <i>Flood Risk and Coastal Change</i></p> <p>London Plan Policy 5.12 <i>Flood Risk Management</i> and 5.13 <i>Sustainable Drainage</i></p>
Conclusion	<p>The Climate Resilience and Flood Risk policy is in line with national and regional policy. The forward- looking approach to flood resistance and resilience, overheating and SuDS set out in this policy should ensure that the City remains resilient even in the face of climate change. The IIA has resulted in alterations to ensure that this is not to the detriment of the City's heritage assets.</p>
Date & Officer	Janet Laban 06/04/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses included a significant level of support for these policies. New guidance from the Environment Agency indicated that sleeping accommodation is not acceptable in the tidal Thames breach area.</p> <p>There were no significant changes between the draft City Plan 2036 and Proposed Publication version. Minor changes included clarification of the position with regard to sleeping accommodation in the tidal Thames breach area to align with the latest Environment Agency Guidance on this topic.</p>

Circular Economy & Waste

Topic	Circular Economy & Waste
Alternatives considered	1)Develop local facilities for waste management
Alternatives considered	2)Continue to rely on waste facilities elsewhere
Draft Plan approach	The draft City Plan 2036 commits the City Corporation as WPA to actively co-operate with WPAs elsewhere to plan for suitable facilities for the City's waste. In relying on facilities elsewhere the DM policy Sustainable Waste Transport requires the use of the river Thames and other waterways, rail and other low emission transport modes.
Proposed submission version approach	The preferred approach in the draft City Plan 2036 has largely been brought forward into the proposed submission version. Reference to the use of rails and waterways for transport of waste and materials has been included and further clarifications of circular economy requirements and their importance in reducing embodied carbon have been made.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	City of London Corporation Waste Arisings and Waste Management Capacity Study review 2016

	<p>This study confirms that there is no viable waste management capacity within the City therefore all waste generated in the City must be transferred elsewhere for treatment. Walbrook Wharf is the City’s only safeguarded waste site and functions as a transfer station with no viable capacity for waste treatment.</p> <p>City of London Local Plan Monitoring Report Waste March 2018</p> <p>Annual monitoring demonstrates fluctuations in the quantities of waste generated in the City largely dependent on the level of redevelopment and commercial activity. The City’s waste is transferred to sites elsewhere in London and to other waste planning authority areas beyond London.</p> <p>Safeguarded Wharves Review 2018</p> <p>This review includes Walbrook Wharf in the list of safeguarded wharves</p>
Consultation responses	<p>There were 10 responses to Issues & Options question 6.12 all of which acknowledged that the City should continue to co-operate through the London Waste Planning Forum, the GLA, the South East London Waste Planning Group, other boroughs and authorities elsewhere that receive waste from the City. In order to reduce waste movements respondents agreed that policy should encourage small scale, innovative facilities for commercial waste and innovative approaches to the management of construction waste</p> <p>In response to Issues and Options question 6.13 twelve of the fourteen respondents thought that Walbrook Wharf should continue to be safeguarded, noting its benefits for low emission waste transport. Two respondents were uncertain whether Walbrook Wharf should continue to be safeguarded. Respondents suggested that circular economy principles should be applied and that waste management within developments should be encouraged.</p>
IIA	<p>The IIA at issues and options stage concluded that waste facilities elsewhere are likely to increase in cost as waste planning authorities reduce capacity for imported waste but use of City land for waste would be uneconomic use of valuable land with detrimental impacts on public realm. Transport of waste adds to traffic volumes, air pollution and carbon emissions with impacts on health. Larger more cost-effective facilities elsewhere could be better managed to protect the environment than many smaller facilities.</p> <p>The IIA of the draft CS policy on circular economy & waste and DM policy on sustainable waste transport, found that the proposed approach would have mainly positive impacts.</p>
Changes made as a result of the IIA	<p>The IIA at issues and options stage and draft plan stage reinforced the need for continued co-operation with other waste planning authorities and sustainable waste transport which are promoted through the proposed policy.</p>
Regional and national guidance	<p>Article 28 of the Waste Framework Directive 2008 as interpreted through the Waste Management Plan for England 2013 gives each Waste Planning Authorities a statutory duty to prepare a Waste Local Plan</p> <p>This is endorsed by National Planning Policy for Waste 2014</p> <p>The London Environment Strategy and the draft London Plan both promote circular economy principles.</p>
Conclusion	<p>The proposed waste policy in the City Plan 2036 commits the City to continued co-operation with other Waste Planning Authorities in line with the recommendations of the Waste Arisings and Waste Management Capacity</p>

	Study Review 2016. Consultees agreed that safeguarding of Walbrook Wharf as a waste site is important to reduce the impacts of waste transport.
Date & Officer	Janet Laban 15/06/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	Consultation responses were largely supportive of these policies. Reference to the use of rail and waterways was suggested, rather than just the river Thames for movement of waste materials. This has been included in policy CEW2 There were no significant changes to this policy at proposed submission stage. Some further explanation and clarifications were included in the supporting text regarding circular economy and embodied carbon.
Date & Officer	Janet Laban 21/02/2020

Topic	Circular Economy & Waste – Zero Waste City
Alternatives considered I&O Question 6.11	Option 1) Business as usual – promote waste hierarchy. This option represents a continuation of the approach in the adopted Local Plan 2015
Alternatives considered	Option 2) Promote circular economy principles, zero waste plans and on-site management of waste for large developments This option promotes a more ambitious approach in line with emerging legislation and guidance
Draft Plan approach	Draft Policy DM Zero Waste City promotes circular economy, waste hierarchy and on-site waste facilities, moving towards a Zero Waste City
Proposed submission version approach	The draft City Plan 2036 preferred approach has been brought forward into the proposed submission version. The importance of this approach in reducing embodied carbon has now been highlighted in policy CEW1. Requirements for Circular Economy Statements have been made clear in the supporting text
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	City of London Corporation Waste Arisings and Waste Management Capacity Study review 2016 London Waste & Recycling Board publication “ Towards a Circular Economy ”
Consultation responses	There were 13 responses to issues and options question 6.11 all of which supported the principles of waste reduction, circular economy and on-site waste management for large developments. Four respondents thought that the waste hierarchy should be promoted alongside the other approaches to waste reduction. One respondent felt that the Local Plan approach should not be too prescriptive. Although Zero Waste plans were supported by 4 respondents further evidence is needed to ensure the feasibility and viability of such plans for individual sites. Therefore an aspiration for a Zero Waste City has been included without a requirement for zero waste plans.
IIA	The IIA found that implementation of this policy would result in mainly positive outcomes. However, it highlighted the uncertainty over potential pollution and impacts on neighbours associated with on-site waste management. These issues have been addressed in the supporting text to the

	draft policy which requires consideration of options subject to environmental permitting, and impacts on neighbouring occupants.
Changes made as a result of IIA	The supporting text to the draft policy has been amended to highlight the potential impacts on neighbouring occupants and need for environmental permitting where on site waste management is implemented.
Regional and national and EU Legislation and guidance	Article 28 of the Waste Framework Directive 2008 as interpreted through the Waste Management Plan for England 2013 gives each Waste Planning Authorities a statutory duty to prepare a Waste Local Plan This is endorsed by National Planning Policy for Waste 2014 The London Environment Strategy and the draft London Plan both promote circular economy principles.
Conclusion	International, national, and regional legislation and guidance promote waste reduction including through circular economy and waste hierarchy mechanisms. The ambitious approach to waste and the circular economy set out in the draft policy DM Zero Waste City is supported by consultation responses. The City of London Waste Arisings and Capacity Study review 2016 sets out the arguments for this policy and mechanisms for its implementation. The IIA has resulted in additions to the supporting text to ensure that on-site waste management respects environmental permitting regulations and is not detrimental to neighbouring occupants.
Date & Officer	Janet Laban 21/02/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes made between reg 18 and Reg 19	Consultation responses were largely supportive of this policy. The benefits of a circular economy approach for embodied carbon are becoming clear (see LETI Climate Emergency Design guidance). This is now reflected in policy CEW. Clarity over when a Circular Economy Statement will be required is now included in the supporting text referring to the GLA guidance which is due to be issued when the new London Plan is adopted. .
Date & Officer	Janet Laban 21/02/2020

Key Areas of Change

Thames Policy Area

Topic	Thames Policy Area
Alternatives considered	1) Should we seek greater use of the River Thames for transport?
Alternatives considered	2) Should the Local Plan actively promote the use of the Thames for future servicing of buildings?
Draft Plan approach	<p>The Draft Plan has not changed significantly although it is now recognised that two Key Areas of Change at Blackfriars in the west and Pool of London in the east now fall within this area. They are places where regeneration is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. So, policies relating to these areas follow the overarching policy for the Thames Policy Area.</p> <p>The policy recognises the Thames Policy Area is an iconic feature of London and serves several important functions such as including a pedestrian Riverside Walk and is a corridor for freight and pedestrian transport. One key area is supporting and safeguarding land for the construction of the Thames Tideway Tunnel at Blackfriars. In addition, retaining Walbrook Wharf Waste Transfer Station, encouraging the reinstatement of Swan Lane Pier, refusing development on or over the river and resisting the permanent mooring of vessels.</p>
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes including additional wording
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	<p>There are two documents which refers to the Thames Policy Area to meet the needs of City residents and workers:</p> <ul style="list-style-type: none"> • The Thames Strategy SPD guides the development of the Thames Riverside in line with policy • The Riverside Walk Enhancement Strategy
Consultation responses	There were 13 responses to issues and options for question 4.14. All of the respondents including TfL and PLA supported in principle greater use of the river for transport purposes. The PLA were supportive for the potential use of the river for deliveries and servicing and the GLA would like to see more use of the river to transport construction and demolition waste. Nine respondents specifically supported bringing unused piers back into operation such as the reinstatement of Swan Lane Pier and Custom House Pier.
IIA	<p>The IIA assessed at issues and options stage included a specific option on both River Transport (Question 4.14) and development on or over the river.</p> <p>The IIA assessed the Key City Places as a whole in terms of whether the concept of them should continue, whether they should be renamed as Areas of Change and should the focus be on areas where significant change is expected?</p>

	<p>The IIA did conclude that the areas as a whole would not be undergoing much change during the period of the revised Local Plan. Therefore, the potential to influence economic growth or the public realm would be limited. It was recognised that by identifying new areas of change that this should lead to improvements in transport, biodiversity and open spaces. Since that time two Key Area of Change have been identified along the Riverside at Blackfriars and the Pool of London.</p> <p>The IIA of the draft CS policy on the Thames Policy Area found that the proposed approach was largely positive with some proposed mitigation suggested to improve policy.</p>
Regional and national guidance	<ul style="list-style-type: none"> • The London Plan, which sets out strategic policies for the River Thames (Policy 7.29) and requires the designation of a Thames Policy Area • The Thames Estuary 2100 Plan produced by the Environment Agency, which addresses flood risk and water quality issues • The Thames Vision produced by the Port of London Authority, which sets a framework for greater use of the River Thames between now and 2035 including targets for increased passenger and freight movements • The UK Marine Policy Statement is the framework for preparing Marine Plans and taking decisions affecting the marine environment. • The emerging South East Marine Plan produced by the Marine Management Organisation, which will provide a wider strategic context
Conclusion	The proposed Thames Policy Area in the City Plan 2036 recognises the importance of this iconic location and how this area is due to change significantly through the two Key City Areas at Blackfriars and the Pool of London.
Date & Officer	John Harte 11/02/20
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses - There was several comments on the Thames Policy Area including:</p> <ul style="list-style-type: none"> • Support for continuing to identify this area, but several respondents suggested there needed to be greater co-operation with adjoining boroughs and agreement on a precise boundary for the area • Support for continued office-led development, but also cultural activity and residential in appropriate locations. <p>Policy amendments: A individual map of the Thames Policy Area has been added to provide context. Additional text to the plan has been added for the Thames Policy Area including improving access to the River Thames by enhancing north-south routes and the creation of a continuous riverside walk. Inclusion on wording of the provision of publicly accessible roof terraces, where they do not impact adversely on protected views, the amenity of occupiers or nearby residents. Additional text ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for</p>

	Nature Conservation and seeking opportunities to create or enhance riverside habitats.
Date & Officer	John Harte 12/02/2020

Blackfriars

Topic	Blackfriars
Alternatives considered	1) Should the Blackfriars Key Area of Change be created as a part of a broader Thames and the Riverside Key City Place?
Alternatives considered	2) Should the existing Thames and the Riverside Key City Place be divided into two areas one in the west at Blackfriars and one in the east at the Pool of London?
Draft Plan approach	The decision was made to create two new Key Areas of Change at Blackfriars and the Pool of London to replace the Thames and the Riverside Key City Place. These are both places where regeneration is desirable and where there is potential for significant redevelopment and enhancement of existing buildings during the Plan period. The Blackfriars area contains some post-war development which is underused and does not contribute to the context or setting of its location. The Blackfriars area is likely to change with the implementation of the Thames Tideway Tunnel creating a high quality new public open space at Blackfriars Bridge Foreshore. Policies relating to the River Thames follow the overarching policy of the Thames Policy Area.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes including additional wording.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	Thames Tideway Reports? See the Thames Policy Area Story.
Consultation responses	Question 4.1 in the issues and options included greater use of the River Thames for transport by retaining and enhancing river transport infrastructure at Blackfriars Pier. See the Thames Policy Area Story for general information.
IIA	See the Thames Policy Area Story for further information. The IIA of the draft CS policy on the Blackfriars Key Area of Change found that the proposed approach was largely positive with some proposed mitigation suggested to improve policy.
Regional and national guidance	See the Thames Policy Area Story for further information.
Conclusion	The proposed Blackfriars Key Areas of Change in the City Plan 2036 recognises the importance of this iconic location along the River Thames and how this area is due to change through the redevelopment of buildings and the creation of the new open space at Blackfriars Foreshore.
Date & Officer	John Harte 11/02/20
	How we got to the Proposed Submission Plan (Reg 19)

Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses - There was only three comments largely in support of the City's ambitions for this area of the City.</p> <p>Policy amendments: Additional text has been added improving access to the River Thames by enhancing north-south routes and the creation of a continuous riverside walk. Further text to ensure the retention or renewal of existing cultural, arts and play facilities, where appropriate.</p>
Date & Officer	John Harte 12/02/20

Pool of London

Topic	Pool of London
Alternatives considered	1) Should the Pool of London Key Area of Change be created as a part of a broader Thames and the Riverside Key City Place?
Alternatives considered	2) Should the existing Thames and the Riverside Key City Place be divided into two areas one in the west at Blackfriars and one in the east at the Pool of London?
Draft Plan approach	<p>The decision was made to create two new Key Areas of Change at Blackfriars and the Pool of London to replace the Thames and the Riverside Key City Place. These are both places where regeneration is desirable and where there is potential for significant redevelopment and enhancement of existing buildings during the Plan period. The Pool of London area contains a number of buildings which are likely to be vacated in the short term, providing an opportunity for redevelopment, enhancement of heritage assets and/or refurbishment and public realm improvements especially enhancing the Riverside Walk to create a continuous riverside park and walkway. Policies relating to the River Thames follow the overarching policy of the Thames Policy Area.</p>
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. Additional text to the plan has been added preserving and enhancing the area's significant heritage assets as well as potential views.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	See the Thames Policy Area Story for general information.
Consultation engagement	<p>Question 4.1 in the issues and options included greater use of the River Thames for transport and promote the use of the river for future servicing of buildings in the City. See the Thames Policy Area Story for general information.</p> <p>As part of the Local Plan Review process a Pool of London Workshop was held on Friday 20th April 2018. At the workshop City planners set out the aims and context for the workshop on the Pool of London and several key stakeholders presented their broad ideas.</p>
IIA	See the Thames Policy Area Story for further information.

	The IIA of the draft CS policy on the Pool of London Key Area of Change found that the proposed approach was largely positive with some proposed mitigation suggested to improve policy.
Regional and national guidance	See the Thames Policy Area Story for further information.
Conclusion	The proposed Pool of London Key Areas of Change in the City Plan 2036 recognises the importance of this iconic location along the River Thames and how this area is due to change through the redevelopment of buildings and enhancing the Riverside Walk.
Date & Officer	John Harte 11/02/20
	How we got to the Proposed Submission Plan
Reasons for changes between Reg 18 and Reg 19	<p>Consultation responses - There was several comments on the Pool of London Area of Change including:</p> <ul style="list-style-type: none"> • Support for the overall ambition and strategy for this part of the City. • Individual land and building owners made representations regarding the potential future uses of particular sites. <p>Policy amendments: Additional text to the plan has been added preserving and enhancing the area's significant heritage assets and historic significance as well as potential views that traverse the area. Improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street. Development proposals and public realm works within the Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site.</p>
Date & Officer	John Harte 12/02/20

Aldgate and Tower

Topic	Aldgate and Tower
Alternatives considered	1) Should the Aldgate Key City Place remain as it is?
Alternatives considered	2) Should the Aldgate KCP be extended to become an East of the City area including the area around Tower Hill and/or Middlesex Street?
Draft Plan approach	The Draft Plan has amended the Aldgate KCP to include the Tower area. This extension was felt to be necessary due to the development happening in terms of increased visitor activity, environmental improvements and the need to improve pedestrian linkages and flows.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarity.
	Reason for preferred approach in draft City Plan 2036 (Reg 19)
Evidence	The Aldgate and Tower Strategy outlines the key aims for the area in terms of public realm and environmental improvements.

	Discussions with colleagues from internal Corporation departments conveyed the desire to extend the Aldgate area down to the Tower to assist with acquiring funding as well as dealing with the changes which will be happening.
Consultation responses	There were 14 responses with the majority agreeing that the Aldgate area should be extended.
IIA	The IIA assessed the Key Areas of Change as a whole, in terms of whether the concept of Key City Places should be continued into the next Plan, whether we should only focus on areas where significant change is expected and whether they should be renamed as Areas of Change. It was considered that the areas would not be undergoing much change during the period of the revised Local Plan and therefore the potential to influence economic growth or the public realm would be limited. The IIA recognised that the existing policies across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces.
Changes made as a result of IIA	None.
Regional and national guidance	The London Plan (Table A1.1) encourages the development potential of the Opportunity Area in the vicinity of Aldgate. The London Plan (Policy 6.1) recognises the need for pedestrian and cycling movement improvements in the Aldgate area.
Cross boundary Issues	The Aldgate and Tower KAOC is adjacent to the Aldgate area within Tower Hamlets. There are several groups which bring together officers from the Corporation and Tower Hamlets to progress community and public realm initiatives and involving various work areas e.g planning policy, environmental enhancement and community services.
Conclusion	The Aldgate KCP was proven to be useful in terms of enabling funding and structure for implementing environmental projects. The extension to the Tower area will allow the same benefits.
Date & Officer	Lisa Russell 13/09/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	There were not significant numbers of comments on the Aldgate and Tower area. There was recognition by respondents that the area still needs more greenery and public realm improvements. Wording has been added to the introductory section to emphasise the broad range of cultural and religious diversity that exists in the Aldgate and Tower KAOC. The Tower of London World Heritage Site has been given more prominence. Recognition has been given to the importance of vacant land in the area and how temporary uses could be developed to improve air quality and amenity, such as temporary green spaces.

	The London Plan, NPPF and environmental health colleagues all emphasise the general recognition of the importance of good air quality and the role increased greenery can play.
Date & Officer	Lisa Russell 05/02/2020

City Cluster

Topic	City Cluster KAOC
Alternatives considered	1)Retain the City Cluster as a KAOC
Alternatives considered	2)Remove the City Cluster as a KAOC
Draft Plan approach	The City Plan 2036 maintains the City Cluster as Key Area of Change.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification. Additional text was added about possible BID status for the cluster.
	Reason for preferred approach in draft City Plan 2036 (Reg 18)
Evidence	Eastern Cluster Area strategy
Consultation responses	<p>The consultation asked several questions about the Eastern City Cluster Key Area, focused on whether it is appropriate to intensify uses in that area and what improvements are needed. Responses over further intensification were split 50/50. The GLA identified the area as one with good transport links and relatively free from constraints when compared to other parts of the City. There are long term concerns from HRP relating to tall buildings placed in the views of the Tower of London.</p> <p>Pedestrian improvements were highlighted in the comments as a vital infrastructure need, as well as improved cycle parking and open spaces.</p>
IIA	At Issues and Options stage, the option to introduce new Key City Places was seen as a positive measure in several objectives. Although much would depend on where the areas are and their purpose. It was considered that the areas would not be undergoing much change during the period of the revised Local Plan and therefore the potential to influence economic growth or the public realm would be limited. The IIA recognised that the existing policies across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces.
Changes made as a result of IIA	None
Regional and national guidance	The Draft London Plan identifies the CAZ and Isle of Dogs (North) as needing to provide 3.5m square meters of B1 office space; the City Cluster will be an important area to deliver this required space.

Conclusion	The City Cluster is a key area for delivering office floorspace requirements and will be subject to large amounts of development and intensification. To manage these changes identifying this area in the Local Plan is critical.
Date & Officer	Lewis Claridge 02/09/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation Responses</p> <p>Questions were raised how further intensification will be managed, particularly on streets from increased footfall, whether the area should be expanded to allow for further tall buildings and clearly delineated.</p> <p>Policy has been amended to refer to the City of London Corporation microclimate and thermal comfort planning advice notes</p> <p>Policy refers to linkages between Liverpool Street Key Area of Change and the City Cluster to acknowledge the increased pedestrian movement</p> <p>Policy refers to the City Cluster Vision as evidence which sets out public realm proposals</p>
Date & Officer	Michelle Price 06/02/20

Fleet Street

Topic	Fleet Street KAO
Alternatives considered	1) Introduce Fleet Street as a KAO
Alternatives considered	2) Don't introduce a KAO on Fleet Street
Draft Plan approach	The City Plan 2036 introduces Fleet Street as Key Area of Change.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for preferred approach
Evidence	Ministry of Justice and HM Courts and Tribunals Service Press Release The press release confirms the intention to develop a new court on Fleet Street.
Consultation responses	The consultation asked whether any new areas require particular focus, Fleet Street was not singled out specifically although there was support for an area in the west of the City.
IIA	At Issues and Options stage, the option to introduce new Key City Places was seen as a positive measure in several objectives. Although much would depend on where the areas are and their purpose. It was considered that the areas would not be undergoing much change during the period of the revised Local Plan and therefore the potential to influence economic growth or the public realm would be limited. The IIA recognised that the existing policies

	across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces.
Changes made as a result of IIA	New areas were explored, and Fleet Street was identified.
Regional and national guidance	The Draft London Plan Figure 2.16 Caz Diagram identifies the Fleet Street area as a legal cluster.
Conclusion	Fleet Street has been introduced as a KAOC due to the potential major changes that could arise through redevelopment related to the new court building. Even if this development doesn't progress there will be major changes along Fleet Street as current occupiers of buildings relocate. There is great need for public realm improvements along Fleet Street to improve the pedestrian experience and provide open space for workers and visitors.
Date & Officer	Michelle Price new KAOC.
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>Consultation</p> <p>There was support with comments suggesting a need for an improvement to this important processional route, with improved public realm and pedestrian access, improvements in the quality of the retail and office offer.</p> <p>Amendments</p> <p>The Fleet St area has been extended to include Ludgate Hill to recognise the historic processional route and St Paul's Cathedral.</p>
Date & Officer	Michelle Price 10/02/20

Smithfield & Barbican

Topic	Smithfield and Barbican KAOC
Alternatives considered	1) Retain the existing North of the City Key City Place as a single Key City Place.
Alternatives considered	2) Amend the existing North of the City Key City Place to focus on two separate areas i.e. the Culture Hub area in the North-West and the Liverpool Street/Broadgate Area in the North-East.
Alternatives considered	3) What are the issues that need to be considered as the Culture Hub develops? How can competing needs of land uses in Smithfield be balanced with the developing Culture Hub e.g large numbers of pedestrians and vehicles associated with the market and hospital.
Draft Plan Approach	The decision was made to review the existing North of the City Key City Place. The main driver was the Corporation of London's decision to create a cultural area focussed on the Barbican and Smithfield area which would align with the relocation of the Museum of London from its present location near the Barbican Estate to Smithfield Market and the creation of a new Centre for Music on the current museum site.

	The KCP area was reduced, and the Broadgate/ Liverpool Street area removed as it was considered that most development in that area would be completed soon.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarity.
	Reason for preferred approach in draft City Plan 2036(Reg 18)
Evidence	<p>The Feasibility Study on the benefits of relocating the Museum of London as present site doesn't maximise visitor numbers due to poor location.</p> <p>Committee reports outlining the benefits for the City of London's economy and reputation of enabling the development of the Culture Mile area.</p> <p>The Culture Mile Look and Feel Strategy explains the Corporation's vision for the Culture Mile Area.</p> <p>The Smithfield and Barbican Area Strategy explains the historic and cultural importance of the area and what improvements could be made to enhance the area.</p>
Consultation responses	<p>There were 12 responses, with 8 agreeing that the North of the City area should be divided into the two suggested areas. Four respondents suggested that the area west of Moorgate should be part of a Cultural Hub KCP, while the area east of Moorgate is dominated by offices and is no different from the main fabric of the City.</p> <p>15 respondents commented on the developing Culture Hub. There was no overall view; there were lots of suggestions for potential improvements which would enable the Culture Hub to develop e.g improved wayfinding and signage, widening of pavements, providing visitor accommodation, separating pedestrians and vehicles and protecting the amenity of residents living near the Culture Hub.</p>
IIA	The IIA assessed the Key Areas of Change as a whole, in terms of whether the concept of Key City Places should be continued into the next Plan, whether we should only focus on areas where significant change is expected and whether they should be renamed as Areas of Change. It was considered that the areas would not be undergoing much change during the period of the revised Local Plan and therefore the potential to influence economic growth or the public realm would be limited. The IIA recognised that the existing policies across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces.
Changes made as a result of IIA	None.
Regional and national guidance	The London Plan (Policy 4.6) supports the development and enhancement of the culture and arts sector in London.

	The GLA document Culture and the Night-time Economy SPG (2017) promotes visitors and culture to improve London's economy.
Cross boundary issues	Discussions have been had with colleagues at Islington Council to discuss the possible impacts of the Culture Mile initiative on Islington. It was agreed that Corporation Policy would not encourage hotel development in Islington to cater for demand for hotel space from increased visitors. Islington have a strict policy which seeks to minimise hotel development.
Conclusion	In conclusion, the North of the City KCP has been adapted to take into account changing Corporation initiatives (the Culture Mile) and the office development market.
Date & Officer	Lisa Russell 11/09/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>There was significant interest in this topic as there are major projects occurring and significant change during the life of the Plan. Corporation policy relating to this KAOC has experienced significant change since September 2018 due to the proposals to move the Museum of London to Smithfield as well as the development of the Culture Mile centred around the Barbican. These changes have been reflected in changes to the policy in the City Plan 2036 as follows;</p> <ul style="list-style-type: none"> ● Detail explaining plans for relocating the meat market and what type of uses would be acceptable for redundant meat market buildings; ● Support for a Masterplan for potential uses of the meat market buildings which will become redundant when the market is relocated outside the City area. ● Clarification regarding potential impacts of the Culture Mile such as noise and traffic movements as well as how creative enterprises will benefit the KAOC. <p>The London Plan and the Mayor's supporting documents emphasise the importance of culture in London. The City Corporation has produced documents which explain and detail the Culture Mile concept and implementation.</p>
Date & Officer	Lisa Russell 05/02/2020

Liverpool Street

Topic	Liverpool Street – Moorgate Key Area of Change
Alternatives considered	1) Should Liverpool Street – Moorgate be retained as a part of a broader North of the City Key City Place.
Alternatives considered	2) Should the existing North of the City Key City Place be divided in two to reflect the significant changes associated with the Elizabeth Line and redevelopment at Broadgate and the expected changes and opportunities provided by the Culture Mile and the flourishing tech start-up provision in the north-east of the City?
Draft Plan Approach	The decision was made to review the existing North of the City Key City Place and give dedicated attention to a cultural area (focussed on the Barbican and Smithfield area) and to the Liverpool Street-Moorgate areas. This would enable a focus of attention on the challenges and opportunities presented for both areas.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
Reason for preferred approach in draft City Plan 2036 (Reg 18)	
Evidence	The expected impact of the opening of the Elizabeth Line, particularly in terms of pedestrian movement. The impact the development at Broadgate on the nature of the area (particularly as a leisure and retail destination) and the consequent demand for office space, other land use and pedestrian movement. The opportunities presented by the increased permeability of a redeveloped Broadgate particularly in terms of ease of access to Shoreditch/ Tech City and the cumulative leisure offer when combined with Spitalfields. The opportunities presented by increased footfall and the increasing popularity of street markets.
Consultation responses	There were 12 responses, with 8 agreeing that the North of the City area should be divided into the two suggested areas. Four respondents suggested that the area west of Moorgate should be part of a Cultural Hub KCP, while the area east of Moorgate is dominated by offices and is no different from the main fabric of the City.
IIA	The IIA assessed the Key Areas of Change as a whole, in terms of whether the concept of Key City Places should be continued into the next Plan, whether we should only focus on areas where significant change is expected and whether they should be renamed as Areas of Change. It was considered that the areas would not be undergoing much change during the period of the revised Local Plan and therefore the potential to influence economic growth or the public realm would be limited. The IIA recognised that the existing policies across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces.
Changes made as a result of IIA	Clarity will be sought on how waste associated with new developments would be managed and the impact of other policies on waste (including circular economy and the Plastic Free City campaign).

Regional and national guidance	<p>The <u>London Plan</u> (Policy 4.6) supports the development and enhancement of the culture and arts sector in London. The draft London Plan 2017 supports the development of London’s culture and creative industries.</p> <p>The GLA document <u>Culture and the Night-time Economy SPG</u> (2017) promotes visitors and culture to improve London’s economy.</p> <p>The <u>Smarter London Together</u> strategy aims to transform London into the smartest city in the world strengthening the city’s tech capability.</p> <p>The UK Government’s <u>Industrial Strategy</u> encourages the UK to be the world’s most innovative economy and a world leader in tech – at the forefront of AI and the creative industries.</p>
Conclusion	In conclusion, the North of the City KCP has been adapted to take into account the significant development in the Liverpool Street-Moorgate areas already underway, the increased permeability of the area and the challenges and opportunities presented by the opening of the Elizabeth Line.
Date & Officer	Alanna Coombes 28/09/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	There has been significant interest in redeveloping this area, including the Broadgate Estate. And changes due to Crossrail development. There is considerable potential for the public realm to be improved.
Officer & Date	Alanna Coombes 12/12/19

Implementation

Planning contributions

Topic	Planning Contributions
Issues and options Alternatives considered	<ol style="list-style-type: none"> 1) No locally specific guidance on use of s106 planning obligations and Community Infrastructure Levy. Relying on national and London Plan guidance 2) Develop locally specific guidance on how s106 and CIL will be used in the City and how viability appraisals will be managed, which addresses the specific circumstances of the City
Draft Plan approach	The Draft Plan sets out how the City Corporation will apply national planning policy and guidance and London Plan policy and guidance on the use of s106 planning obligations and the Community Infrastructure Levy to ensure appropriate site-specific mitigation of development and contributions towards necessary infrastructure. The approach identifies how the City Corporation will consider viability information and requires that this should be publicly available.
Proposed submission version approach	The approach set out in the draft City Plan 2036 has been carried forward to the proposed submission version. There have been minor wording changes in supporting text for clarification.
	Reason for the preferred approach in the draft City Plan 2036 (Reg 18)
Evidence	No specific evidence, but the Draft Plan interprets statutory requirements for s106 planning obligations and the Community Infrastructure Levy and applies provisions to the City of London.
Consultation responses	<p>There was no specific question in the Issues and Options regarding planning contributions (s106 planning obligations and community infrastructure levy) or viability appraisals. Comments were received in relation to other Plan requirements which consider the use of planning obligations and viability considerations.</p> <p>1 respondent raised the need for flexibility in relation to office policies and viability matters to deal with future uncertainty.</p> <p>1 respondent raised viability in relation to requirements for extending Sustainable Drainage provisions.</p> <p>6 respondents commented on planning obligation requirements for affordable housing, with 4 supporting an approach to the use of commuted sums to deliver affordable housing and 2 supporting the provision of affordable housing on-site.</p>
IIA	Planning Contributions was not assessed as a separate policy under the IIA for Issues and Options.
Changes made as a result of IIA	None

Regional and national guidance	<p>National Planning Policy Framework (2018): Paragraphs 54-57 set out the statutory requirements and 3 tests for the use of Planning Obligations and provide guidance on the use of viability assessments.</p> <p>National Planning Practice Guidance: Provides detailed planning guidance on viability considerations (July 2018), planning obligations (May 2016) and the Community Infrastructure Levy (March 2018).</p> <p>Draft London Plan 2018: Policy T9 Funding transport infrastructure through planning – provides guidance on how the Mayor will use the Mayoral Community Infrastructure Levy and Planning Obligations to deliver Crossrail and other strategic transport infrastructure. Policy DF1 Delivery of the plan and planning obligations – provides guidance on the testing of viability appraisals.</p> <p>Homes for Londoners: Affordable Housing and Viability SPG (2017): Detailed guidance on how the Mayor will assess viability appraisals and the process for undertaking appraisals and ensuring they are publicly available.</p>
Conclusion	The proposed Planning Contributions policy in City Plan 2036 provides the framework for use of s106 planning obligations and Community Infrastructure Levy to mitigate the impact of development and ensure provision of necessary infrastructure, affordable housing, training and skills provision and carbon offsetting to ensure delivery of other policies in the Plan. The IIA of the draft CS policy found that the proposed approach was largely positive.
Date & Officer	Peter Shadbolt 31/08/18
	How we got to the Proposed Submission Plan (Reg 19)
Reasons for changes between Reg 18 and Reg 19	<p>9 comments were received on draft policies S27 and PC1.</p> <p>Comments sought clarification and updating to reflect new legislation and Mayoral policy change. Various changes have been made to provide clarification of policy and supporting text without materially affecting the aims of the policies.</p> <p>Revised Community Infrastructure Levy Regulations and revised National Planning Practice Guidance came into effect in September 2019. References to the Regulation 123 List have been deleted and reference to the Infrastructure Funding Statement added.</p> <p>Mayoral CIL2 came into effect in April 2019. Changes to the policies and supporting text have been made to ensure that they align with the new Mayoral CIL charge.</p>