

# City Plan 2036

Shaping the Future City



**City of London Local Plan**  
PROPOSED SUBMISSION DRAFT  
March 2021



CLEAN VERSION

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# Foreword



I have pleasure in presenting the City of London Corporation's Proposed Submission Draft Local Plan for consultation. The foundations of our Plan are to create a more vibrant and sustainable future as we look forward to emerging from the Covid-19 Pandemic and following the UK's departure from the European Union. We have further updated the Plan to take account of recent events, whilst ensuring that it remains flexible and adaptable to further change.

Our Plan is a plan for growth, but not growth at any cost. It complements the City Corporation's innovative and groundbreaking Climate Action Strategy, setting out how development will contribute towards delivery of a net zero carbon City of London by 2040. It builds upon our ambitious Transport Strategy, seeking to reduce congestion and deliver improvements in the public realm, road safety and air quality, providing for freight and servicing consolidation and encouraging active transport and public transport. It highlights the need for the City to be a vibrant visitor and cultural destination, and a greener and healthier place in which to live, work and visit.

The draft Plan sets out a positive view of the City's future, with the City remaining an attractive place to do business or visit. We may see working patterns change, and businesses may change the way they use their space, but ultimately, we believe that there will remain a demand for the modern, flexible and adaptable space which the Plan seeks to provide, as there is a focus on quality of space and how it enables business and commerce to thrive.

People are, of course, at the heart of this Plan, whether they are residents, workers or visitors. We want to see healthy development, which means the City remains attractive to world-class talent, enhances opportunity for all and contributes to London's and the UK's continued success.

As we approach the final stages of our Local Plan preparation, I encourage all stakeholders to respond to this consultation. Although the consultation process will be different due to the pandemic, the City Corporation is committed to active public engagement on this new Plan through virtual forms of communication. To realise our ambitions for the City and deliver the increasingly attractive, healthy and inclusive City we all want to see, we need to hear your views.

Alastair Moss

Chair of the Planning & Transportation Committee

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# 1. Introduction

## 1.1. What is the Local Plan?

1.1.1. The Local Plan is a plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. The Local Plan sets out the City Corporation's vision, strategy and objectives for planning the Square Mile, together with policies that guide decisions on planning applications. The Local Plan includes two Policies Maps showing which policies apply to specific locations.

## 1.2. Why is the City preparing a new Local Plan?

1.2.1. The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. It is important that the City's planning framework remains responsive and flexible to address changing circumstances, whilst providing a clear vision for how a future City should look.

1.2.2. Local Plans are required to look ahead over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. However, they must also be reviewed at least every five years to take account of changing circumstances affecting the area, or any relevant changes in national policy.

1.2.3. Since the City's current Local Plan was adopted, the Government has made a number of changes to the planning system through its planning reform agenda, with notable changes being made to permitted development rights and the Use Classes Order during 2020. As a result, a number of policies need updating to ensure they remain up-to-date and responsive to national policy. In addition, the Mayor of London is reviewing the London Plan which provides a strategic planning framework for London for the period up to 2041.

1.2.4. By preparing a new Local Plan covering the period to 2036, the City Corporation will be able to address revised national and London Plan policy, whilst maintaining a positive planning framework to meet the City's long-term needs.

## 1.3. The stages of preparing the Local Plan

1.3.1. The Proposed Submission Local Plan, titled City Plan 2036 (the 'Plan'), is the third stage of preparing a new local plan. The first stage of the process was the Issues and Options stage in 2016, during which consultation took place on the key planning issues facing the City and on the potential options that should be considered to address them. The second stage, the draft Local Plan, was a consultation on a full draft Plan during later 2018 and early 2019.

1.3.2. Since then, the City Corporation has analysed the consultation findings and undertaken further evidence gathering to prepare the final stage, the Proposed Submission Plan.

1.3.3. Following consultation on the Proposed Submission Plan, it will be submitted to the Secretary of State for Housing, Communities and Local Government. The Secretary of State will then appoint an independent planning Inspector to examine the submitted Plan, which is expected to be adopted in 2022.

1.3.4. Figure 1 illustrates the stages in the preparation of City Plan 2036, together with an indicative timescale.

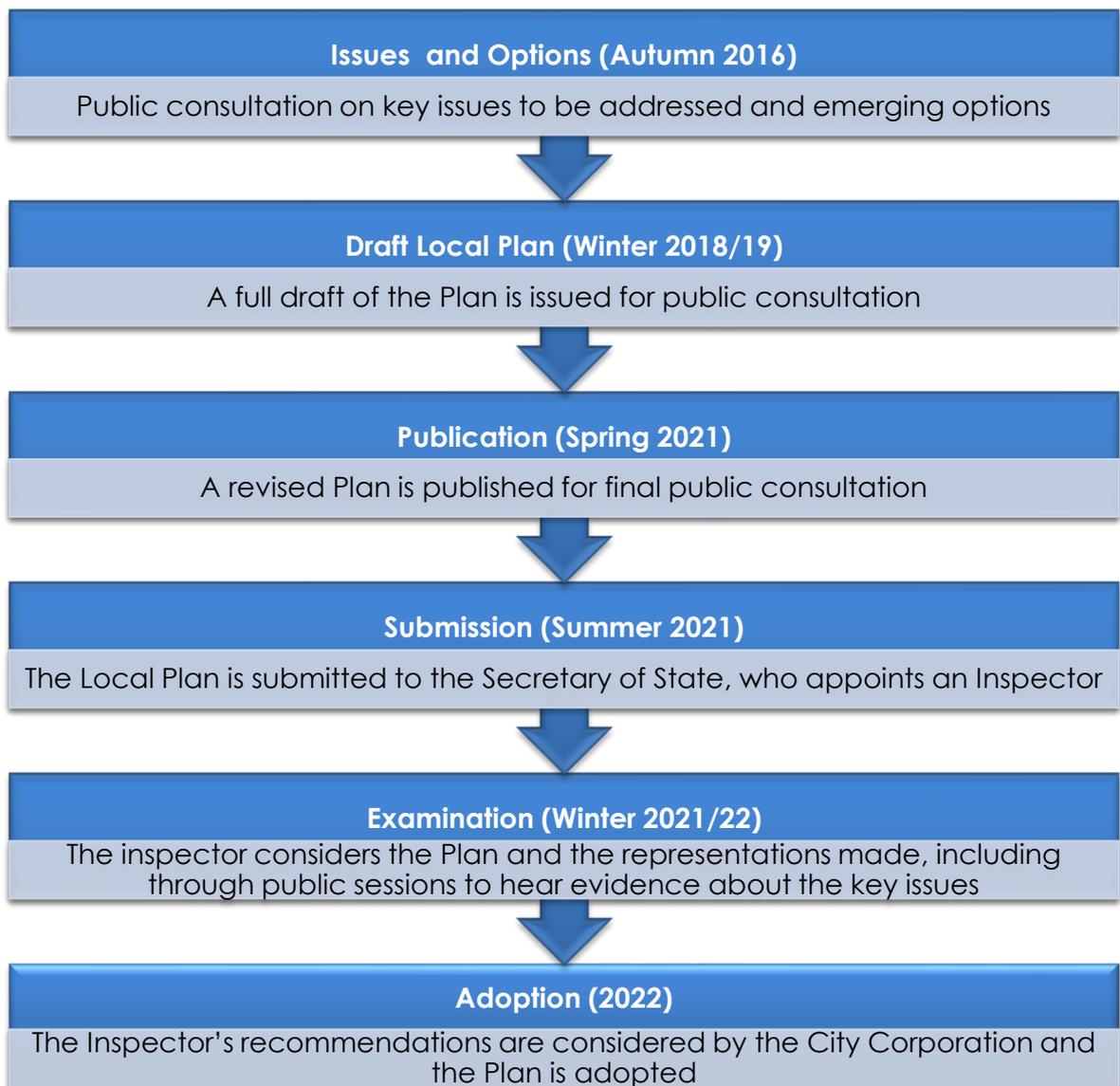


Figure 1: The main stages of preparing the new Local Plan

## **1.4. Policy context**

1.4.1. This Plan is being prepared in an era of significant and rapid change and has been deliberately drafted to provide a flexible policy framework which encourages appropriate development and is responsive and adaptable to change.

1.4.2. In particular, the Plan seeks to provide a flexible, resilient policy framework which responds to three fundamental health and well-being, environmental and economic influences: Covid-19, climate change, and the UK's departure from the European Union.

### **Climate change**

1.4.3. The threat from climate change is one of the most serious threats we face today. It extends beyond environmental challenges and has the potential to affect economic prosperity, social justice and global stability. Wide ranging responses are essential, encompassing individual local actions, local, strategic and national government programmes, business and community scale initiatives and global agreements. Scientific evidence indicates that the climate is already changing, and that action is needed to limit global warming to 1.5 degrees.

1.4.4. The City Corporation has long been a champion of clean air, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal well-being. It has in 2020 adopted a Climate Action Strategy which sets out a pathway to achieving net zero emissions for both the City Corporation's activities and the wider activities of businesses and residents in the City of London. The Strategy and, more importantly, the actions outlined will ensure the Square Mile and City Corporation achieve net zero carbon by 2040 and make a positive contribution to tackling climate change, are resilient to the risks of climate change and seize the opportunities presented by the transition to a low-carbon economy.

### **Covid-19 pandemic**

1.4.5. Much of this Plan was drafted prior to the outbreak of the Covid-19 pandemic, which has had significant health, well-being, environmental and economic impacts locally and globally. As medical treatments are discovered and rolled out, including potential vaccines, the severity of these health impacts is expected to reduce and communities will recover in the medium term. However, the pandemic is also leading to behavioural changes; some are temporary, but some are likely to become established as part of the 'new normal'. The acceleration of existing trends and the creation of new trends both need to be taken into account when planning for the medium and longer term. Therefore, the Plan is looking beyond the current pandemic to a period when a probable vaccine has enabled the City to once more provide a vibrant centre of business creativity and innovation which harnesses the potential of existing and new trends.

1.4.6. Throughout its long history the City of London has been a centre for creative innovation and collaboration, bringing business and people together. The Covid-19 pandemic has in the short term shifted much of the City's business online with many City workers using modern technology to work from home, and consequently significant reductions in journeys into the City and footfall within it. Whilst the use of digital technology and remote working will remain important to the success of many City businesses in the future, reliance solely on remote working can have longer term drawbacks as it can limit the scope of the creative innovation, collaboration and informal business relationships that the City thrives upon. Therefore, it is expected that the City will remain an attractive base for a wide range of existing and new businesses, operating more flexibly with a blended approach of in-office and remote working, to meet the changing business environment, space needs and work and lifestyle expectations of their workforce. There is an opportunity to transform City workplaces to offer a rich and fulfilling experience for City workers, with the office becoming a place for socialising, meeting, sharing and collaboration. The return of City workers will bring vitality to provide a boost to businesses that rely on high footfall, including retail, food and beverage and support services to the City's offices, that have been particularly affected by Covid-19.

1.4.7. Although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.

1.4.8. The City Corporation will work closely with national, regional and local government, landowners and investors, businesses and residents to ensure that the City of London remains successful. It is acknowledged that the pandemic will have short and perhaps medium-term financial implications for the City Corporation and for Transport for London, which may impact on, or delay, implementation of some policy aspirations and will need to be closely monitored. Nonetheless, this Plan will provide a framework to give confidence to those who wish to be involved in and to invest in the City and it has been written to be adaptable to new changes and challenges as they present themselves.

### **UK trading relationships**

1.4.9. As a world leading financial and professional services centre, the future prosperity of the City will depend to a large extent on the international and national economic context including future trading relationships. The UK's departure from the European Union is leading to new trading relationships and patterns. The City's reputation for expertise and innovation will be particularly important as it adapts its existing strengths in financial and professional services, and develops new strengths, to suit changing global circumstances.

1.4.10. The Local Plan is influenced by national and London-wide planning policies and guidance, as well as plans and strategies produced by neighbouring boroughs and a range of statutory bodies.

### **National planning policy and guidance**

1.4.11. Local Plans are required to be consistent with national planning policy contained in the National Planning Policy Framework (NPPF). The NPPF sets out the broad policy approach to be taken across a range of planning issues and establishes a presumption in favour of sustainable development. Further detail is provided in the Planning Practice Guidance (PPG), an online resource which is regularly updated to ensure guidance remains current.

1.4.12. The Government's planning reform agenda has resulted in a number of changes to national legislation and guidance. These changes, including those brought forward during 2020 to permitted development rights and the Use Classes Order, have been incorporated into this Plan. The Government has published a Planning White Paper outlining further fundamental changes to the planning system in England which would impact upon the preparation and content of local plans and the operation of development management. These reforms, if enacted, will be considered through a subsequent review of the City of London's Local Plan.

### **The London Plan and other Mayoral strategies**

1.4.13. The Mayor of London has a duty to prepare a spatial development strategy, the London Plan, and to keep it under review. The City's Local Plan, like those produced by the London boroughs, must be in general conformity with the London Plan. The London Plan forms part of the statutory development plan for the City of London, along with the City's Local Plan. The Local Plan has been prepared in alignment with the Mayor's Publication London Plan (December 2020).

1.4.14. The Mayor produces supplementary planning guidance to provide further detail on particular policies in the London Plan. In addition, the Mayor publishes a range of other strategies, including those relating to transport, the environment, economic development, housing and culture. These documents have been taken into account in the preparation of the City's Local Plan.

### **Neighbourhood Plans**

1.4.15. Neighbourhood plans should support the delivery of strategic policies set out in a local plan. Once approved, a neighbourhood plan becomes part of the development plan for the neighbourhood area and is given the same legal status as a local plan. The local planning authority must co-operate with a neighbourhood forum in the preparation of neighbourhood plans, providing assistance as required.

1.4.16. At the time of preparation of City Plan 2036, no neighbourhood forum has been established in the City of London and no neighbourhood plans are in preparation or have been adopted. The City Corporation will co-operate with any

neighbourhood forum in the preparation and adoption of a neighbourhood plan within the City of London administrative area in accordance with statutory requirements.

### **Duty to co-operate**

1.4.17. Local planning authorities are required by legislation to co-operate on planning issues that cross administrative boundaries. The duty requires local planning authorities to engage “constructively, actively and on an ongoing basis” on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure.

1.4.18. The City Corporation already works closely and co-operates with its neighbouring boroughs, the Mayor of London and other partners on strategic and cross boundary planning issues. National planning policy requires strategic policy-making authorities to prepare and maintain statements of common ground to demonstrate effective and ongoing joint working. The City Corporation liaising with the Mayor of London, neighbouring boroughs and other duty to co-operate partners to agree statements of common ground to support the development of City Plan 2036 and the development plans and strategies of partners.



Figure 2: Strategic context: The City of London's location within the Central Activities Zone

### **City Corporation strategies**

1.4.19. The Local Plan can help to facilitate the delivery of other City Corporation strategies where their objectives involve the use or development of land and

provides a mechanism to assist with co-ordinating and balancing the requirements of different strategies.

1.4.20. In particular, the Local Plan is one of the mechanisms through which the City Corporation's Corporate Plan and Climate Action Strategy will be implemented. The Corporate Plan sets out the City Corporation's overarching strategic direction and is structured around the three pillars of society, economy and environment. Although the Corporate Plan has a shorter time horizon than the Local Plan (2018-23), it is a visionary and forward-looking document and City Plan 2036 complements and helps deliver many of its objectives. The Climate Action Strategy set out the City Corporation's pathway to achieve a zero carbon City by 2040.

1.4.21. This Plan has been prepared alongside the City Corporation's first Transport Strategy. Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in City Plan 2036 and the Transport Strategy are aligned.

### **Evidence base**

1.4.22. The policies in City Plan 2036 have been informed by a range of evidence published by the City Corporation and by other organisations, including the Mayor of London in support of the London Plan. In some cases, additional studies have been undertaken to provide relevant and up-to-date evidence to support and justify the proposed policies. The evidence that underpins the draft Plan has been published on the City Corporation's website. This includes an assessment, undertaken in March 2020, of the combined effects of the policies in City Plan 2036 on the overall viability of development in the Square Mile and the viability of delivering the Plan's affordable housing targets.

### **Integrated Impact Assessment**

1.4.23. City Plan 2036 has been informed by an Integrated Impact Assessment (IIA), which combines the following assessment processes into a single document:

- Sustainability Appraisal, including a Strategic Environmental Assessment;
- Equality Analysis;
- Health Impact Assessment.

1.4.24. The IIA is an integral part of the plan making process and has assessed draft policy options in terms of their compatibility with a range of sustainable development objectives; their implications for the promotion of equalities; and their implications for health and wellbeing. IIA is an iterative process and further assessment will be undertaken on changes to the Plan as a result of pre-submission consultation or modifications proposed through the Examination process.

1.4.25. A Habitats Regulations Assessment has also been undertaken to assess whether the new Plan would have any significant effects on sites designated as being of European importance for their biodiversity.

### **Other planning documents**

1.4.26. The Local Plan is supported by a number of other planning and City Corporation documents, including:

- Local Development Scheme – this lists and describes all planning policy documents and the timetable for preparing them.
- Statement of Community Involvement – this sets out the procedures and methods that will be used to consult and engage with the public in the preparation of planning policies, and the determination of planning applications.
- Supplementary Planning Documents (SPDs) – these provide further explanation of Local Plan policies where this is needed.
- The City of London Community Infrastructure Levy (CIL) – CIL is a statutory charge on new development that is used to help fund the provision of infrastructure. A charging schedule specifies the rates that apply according to the land uses proposed.
- The City of London Transport Strategy – this sets out a 25 year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.

### **Implementation and delivery**

1.4.27. Implementation of the Local Plan will require partnership working and co-operation with a range of organisations, including developers, businesses, residents, community and amenity groups, transport and service providers, the Mayor of London and other London boroughs.

1.4.28. A key mechanism for implementing the Local Plan is the consideration of planning applications through the development management process. Policies in this Plan apply to all development, including major new development, extensions to existing buildings, other major refurbishments and minor development, unless otherwise specified in individual policies. The Local Plan should be read as a whole and applications for planning permission will be considered against all relevant policies in the Local Plan, the London Plan, the NPPF and any future neighbourhood plans.

1.4.29. The City Corporation will work closely with developers, occupiers and residents to ensure that City Plan 2036 is implemented and delivers positive improvements across the City. Where necessary, the City Corporation will use its powers of enforcement to ensure compliance with, and effective implementation of, Local Plan objectives and policies. The City Corporation's

Enforcement Plan has been adopted as a Supplementary Planning Document and sets out the principles and procedures that will be followed to ensure development is effectively regulated. Where necessary, enforcement action will be taken. The Enforcement Plan will be kept under review and amended to reflect new provisions arising out of changes to national, London-wide or local policy and/or practice and experience in implementation.

1.4.30. The City Corporation will also use its powers in relation to issues such as management of the highways and public realm to help deliver the vision and policies in City Plan 2036. It will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high-quality development the City needs. An Infrastructure Delivery Plan has been prepared identifying the infrastructure required to deliver the Plan and demonstrating the deliverability of infrastructure during the plan period. It considers the investment plans of a range of infrastructure providers to identify potential gaps in funding, or trigger points which require a step change in levels of infrastructure. If gaps in the funding of infrastructure necessary to implement the Local Plan are identified, the City Corporation will seek alternative funding streams, including the use of CIL and other contributions from development, and will prioritise available funds.

## **1.5. Structure of City Plan 2036**

1.5.1. The structure of City Plan 2036 is based on the three strategic aims of the City Corporation's Corporate Plan, which are to:

- Contribute to a flourishing society;
- Support a thriving economy; and
- Shape outstanding environments.

1.5.2. Individual policy topics are grouped within these broad themes. The first policy under each topic is a Strategic Policy, which addresses the strategic context, the relationship with other plans and strategies, and key planning issues. These policies are followed by Development Management Policies that will be used alongside the Strategic Policies in the consideration of applications for planning permission and related consents.

1.5.3. A fourth theme of Key Areas of Change has been added to provide a framework for the area-specific policies within the Local Plan, and a fifth theme of Implementation has been added to focus on how the Plan will be delivered.

1.5.4. The structure of the Plan is shown diagrammatically in Figure 3 and is not intended to represent any form of hierarchy.

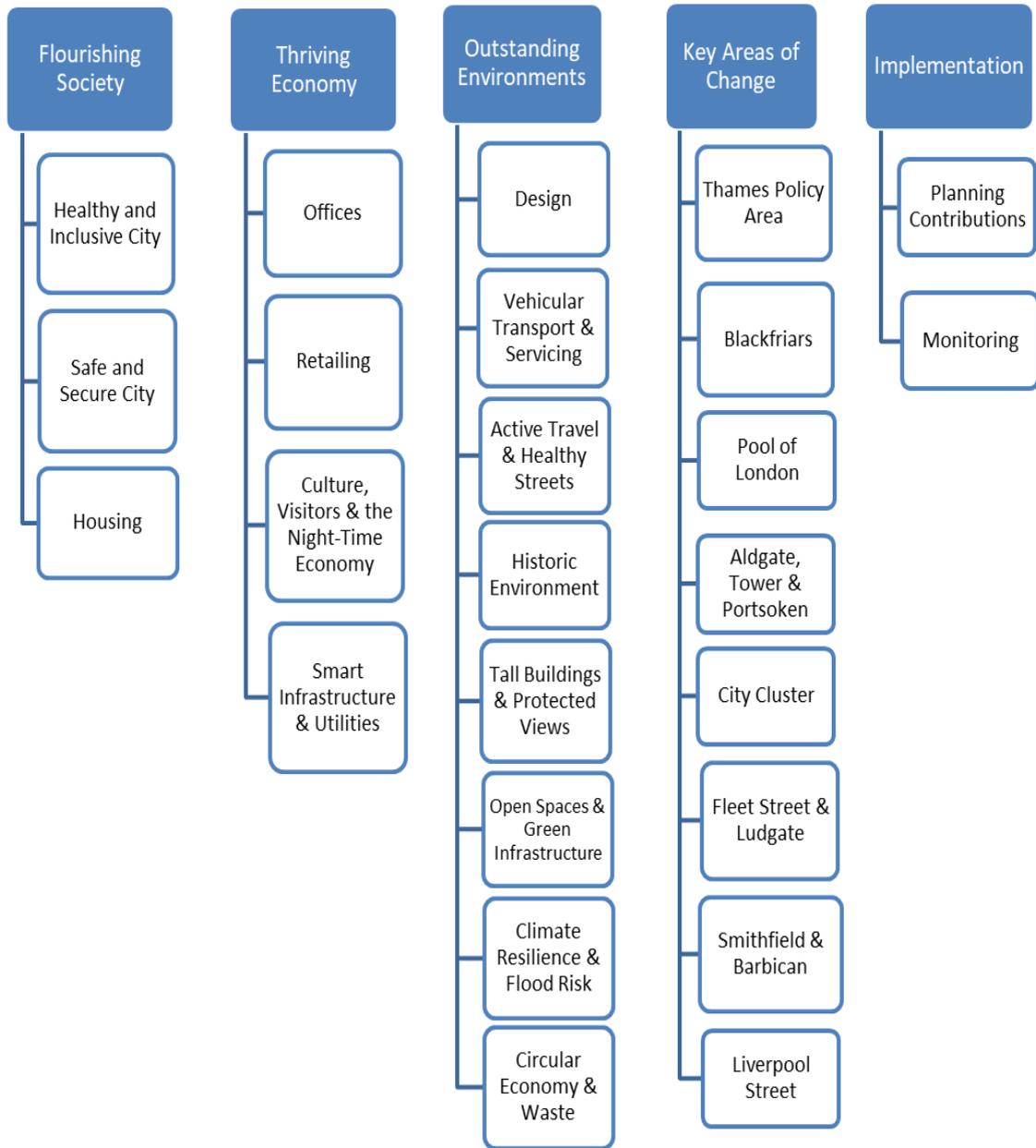


Figure 3: Structure of City Plan 2036

# 2. The City Today

City employment in 2018

**522,000**



44\* hotels in the City and  
6 currently under construction



(30\* conventional,  
13 apart-hotels and one hostel)



**21.5m**

business and leisure  
visitors to the City in 2018

**7,850**



Total residential units

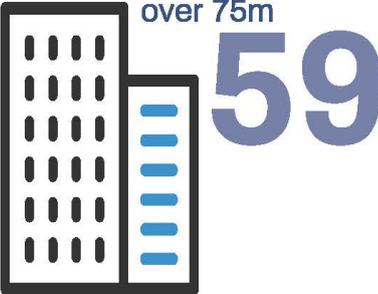
**8,000**



Residential population



Number of tall buildings  
over 75m



**93%** of commuter travel  
to the Square Mile is by  
public transport (**84%**)  
walking (**5%**) or cycling (**4%**)



**12**



tall buildings in the planning pipeline  
over 75 metres tall



**6.7m**

visitors to City  
attractions every year.

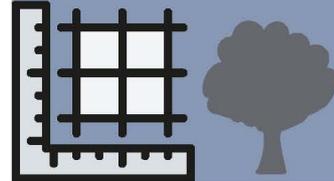
**9.3 million**sq.m

*Total office floorspace*

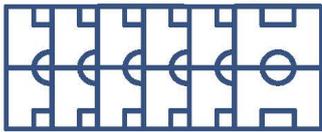
**760,000**sq.m

*Total office floorspace under construction*

**33 Hectares**  
*of open space*



Over 100 green roofs installed in the City



the equivalent of football pitches

**6**

Number of retail units

**2,000**



**75%** - of office permissions submitted since 2014 BREEAM\* rated 'Excellent' or 'Very Good'

**94%** - of all permissions submitted since 2014 BREEAM\* rated 'Excellent' or 'Very Good'  
\*Pre-Construction Assessment

Number of businesses in 2019

**23,890**



**99%** SME's however large firms still provide over **50%** of jobs



**600+**  
*Listed Buildings*



**27**

*Conservation Areas*

# 3. Vision, Strategic Objectives and Spatial Strategy

## 3.1. Contribute to a Flourishing Society

### The Vision....

- 3.1.1. The needs of the City's diverse communities will be met in a sustainable and inclusive way, addressing the health, employment, education, leisure and housing needs of the variety of people who work, live and visit the City and incorporating the principles of Good Growth set out in the London Plan.
- 3.1.2. The City's population will enjoy good health and wellbeing. The health and wellbeing of the City's communities will be integral to the design and delivery of new buildings, open spaces and the wider public realm, helping the City recover from the Covid-19 pandemic, provide inclusive and diverse spaces and address the implications of climate change. Health inequality across the City will be reduced. Workers and residents will have access to a range of health services within the Square Mile and beyond. Partnership working with businesses and organisations both inside and outside the City will effectively tackle the wider causes of poor health by substantially improving the City's air quality, promoting the recreational benefits of a healthy lifestyle, and ensuring inclusive access to good quality open spaces and recreational opportunities.
- 3.1.3. The City will have a network of high quality social and community facilities in accessible locations to foster cohesive and healthy communities. Links with neighbouring boroughs will be strengthened and closer co-operation will provide a stronger sense of community and more efficient services.
- 3.1.4. There will be a mix of housing, located in or near identified residential clusters, providing a high-quality living environment consistent with a city centre location. Housing will not be appropriate where it would conflict with the City's global business role or result in poor residential amenity. Affordable housing will be required on-site within the City. Where off-site contributions are exceptionally allowed, they will be used to deliver new affordable housing within and outside of the City, principally on the City's managed housing estates, contributing to meeting London's wider housing needs.
- 3.1.5. The City will remain a safe place to work, live and visit. Security measures will be designed into new buildings and public spaces, whilst ensuring that the City's streets, walkways and open spaces are welcoming and inclusive. Where necessary, an area-wide approach to delivering collective security will be sought working with the City of London Police as a key partner.
- 3.1.6. Good building design and effective management of night-time entertainment, combined with a broad mix of uses, will reduce the potential for anti-social

behaviour and adverse impacts on residents and will help to maintain residential amenity.

3.1.7. The City Corporation will work with partners to ensure that high quality training and learning facilities are accessible to all and that the City's higher education institutions continue to enjoy an international reputation for excellence. City residents and those in neighbouring boroughs will develop the skills needed to enter careers in the City and benefit from the City's prosperity. The City will offer equality of opportunity, accessibility and involvement so that people from across London's diverse communities will have the chance to benefit from the many opportunities and facilities it offers.

**Strategic Objective:**

3.1.8. To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.

## **3.2. Support a Thriving Economy**

### **The Vision....**

3.2.1. The City will remain the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas and flexible ways of working, particularly in the technology and creative sectors, and delivering inclusive and sustainable growth and prosperity for its communities, London and the UK.

3.2.2. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.

3.2.3. The City will be open to new business, new ideas and innovations and new ways of working and collaborating, building upon the experience and lessons learned through the Covid-19 pandemic. New business floorspace will be flexible and adaptable creating spaces for collaboration and innovation and meeting the demands of different types of business occupiers and their workforces, including incubators, start-ups and other small and medium sized companies. There is an opportunity for the City's cultural offer to be central to its recovery and future resilience. Office space will be complemented by other accessible commercial, cultural and leisure uses adding vibrancy and animation to the City's streets and benefitting the City's diverse communities.

3.2.4. The number of business and tourist visits to the City will significantly increase as the City is recognised for its world-class cultural and creative facilities. Culture Mile will transform the north west of the City into a vibrant and inclusive strategic cultural area of national and international stature.

3.2.5. The City's retail offer will adapt to changing demands, offering a range of meanwhile and complementary services to the City's wider business and cultural offer and contributing to the City's development as an evening and 7-day a week retail, leisure and cultural destination. Retail growth will be focused on the Principal Shopping Centres of Cheapside, Liverpool Street/Moorgate, Leadenhall Market and Fleet Street. Smaller retail, collaboration and cultural uses will be provided across the City, animating ground floor spaces and meeting local worker and resident needs.

3.2.6. The City's continued economic success will be underpinned by world-leading digital connectivity and data services both within buildings and in the public realm. The provision of utilities and infrastructure will anticipate the demands set by the City's growth, funded in part through the Community Infrastructure Levy and planning obligations.

**Strategic Objective:**

3.2.7. To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

### **3.3. Shape Outstanding Environments**

**The Vision....**

3.3.1. The City will be physically well connected and responsive. Sustainable travel patterns and modes of transport will be promoted and public transport capacity increased, principally through the opening of the Elizabeth Line, and the Northern Line/Bank Station Upgrade.

3.3.2. The City's streets will provide an attractive and safe environment for walking and cycling. Pavement widening and reallocation of road space for pedestrian or cycle use, allied with increased planting and greenery, will provide more space for moving around, building on the initiatives put in place during the Covid-19 pandemic. Traffic reduction and improvements to the City's streets and junctions will transform the safety, look and feel of the City's street network.

3.3.3. Partnership working with City businesses and developers will minimise the number of delivery and servicing trips into the City and will reduce congestion through consolidation and by re-timing trips to take place outside of peak hours. The majority of last mile deliveries will be undertaken by zero emission vehicles, and the City's air quality will significantly improve as a greater share of motorised traffic switches to electric or other zero emission modes.

3.3.4. Use of the River Thames by commuters and for freight and servicing will significantly increase as the Thames becomes a major corridor for the movement of people and the transport of materials including construction and deconstruction materials, waste, freight and general goods.

3.3.5. The City will remain a centre of world class architecture with flexible, adaptable and healthy buildings and a high quality of public realm for people to admire and

enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline and provide for the health and wellbeing of workers, adding to the tall building cluster in the east of the City.

- 3.3.6. The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where this is appropriate, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, backdrop and views of St Paul's Cathedral and the Tower of London.
- 3.3.7. Buildings, streets and spaces will be inclusive, interesting, legible and fit for purpose. Computer modelling, simulation and smart technology will be used to ensure that new buildings, and the spaces between buildings, create an environment which attracts businesses and people from across the world.
- 3.3.8. The City's buildings, public realm and transport will be highly sustainable, designed to make efficient use of natural resources, minimise emissions and be resilient to natural and man-made threats. In partnership with public and private sector organisations the City will adopt new technologies to transition to a zero emission City by 2040, in line with the ambitions set out in the City Corporation's Climate Action Strategy.
- 3.3.9. The City will be a much greener place, with additional planting in and around new and existing buildings and the City's streets and spaces, enhancing the environment, contributing to health and wellbeing and mitigating the impacts of pollution. New open and amenity spaces will be created including through the creation of new pedestrian routes, accessible and permeable buildings, and the provision of amenity space at upper or roof levels. Public access to private open space will be encouraged. Biodiversity will be increased by the inclusion of wildlife-friendly features in new and existing open spaces and buildings.
- 3.3.10. The risk of flooding will be minimised by incorporating sustainable drainage into new developments and the public realm, alongside measures to reduce run-off and increase rainwater recycling. The Thames Tideway Tunnel will be completed, greatly reducing storm discharges from the combined sewer system and improving the quality of the water in the River Thames.
- 3.3.11. The City will become a Zero Waste City as developers, businesses and residents adopt Circular Economy principles and reduce the amount of waste they produce whilst keeping resources in use for as long as possible. More flexible building designs will reduce the need for redevelopment of outdated office stock. Walbrook Wharf will continue to provide a facility for transferring materials, including waste, by river barge, thereby reducing lorry traffic in the City and across London.

**Strategic Objective:**

- 3.3.12. To shape the future City, ensuring that it is physically and virtually well connected, sustainable and responsive, resilient to natural and man-made

threats, and delivers outstanding buildings, streets, public spaces, and heritage assets.

### **3.4. Key Areas of Change**

#### **The Vision....**

##### **Blackfriars**

3.4.1. Redevelopment or refurbishment of existing buildings will provide new high-quality office and commercial accommodation with active ground floors within an improved public realm and environment that better reflects the status of the City. Easier access to the riverside walk and a safer and more pleasant environment for all users, including pedestrians and cyclists, will be delivered. A new area of public realm at Blackfriars foreshore, created through the Thames Tideway project, will introduce greenery to the riverside and provide a place for relaxation and recreation.

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

3.4.2. There is an opportunity to increase vibrancy and vitality in this area through greater use of the riverside walk, more leisure, retail and cultural public uses at ground level and the provision of publicly accessible roof terraces and spaces. Servicing of individual buildings will be improved through the introduction of shared servicing bays and access points. The area will be regenerated through the redevelopment or refurbishment of appropriate riverside sites. The public realm and accessibility will be significantly improved, contributing to an improvement in air quality. A higher quality pedestrian route will be created between London Bridge and the Tower of London creating a continuous attractive riverside walkway free of motorised traffic. Easier pedestrian access across Lower Thames Street will encourage more City workers, residents and visitors to enjoy the riverside.

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

3.4.3. Partnership working with the London Borough of Tower Hamlets, businesses and residents will provide a framework for the delivery of improvements. Redevelopment and refurbishment will enhance the appearance and vibrancy of this area, with a mix of offices, residential, retail, community and cultural facilities, catering for residents, workers, students and visitors. The open space at Aldgate Square will be the focal point of a high-quality public realm which provides better facilities for pedestrians and cyclists. Air quality will be improved particularly in proximity to The Aldgate School and the Middlesex Street and Mansell Street residential estates. Pedestrian connections, permeability and wayfinding will be improved, especially through large development sites and between Aldgate and Tower Gateway. Joint working with TfL and other transport operators will deliver improvements in public transport capacity to meet increasing demand. Residents will have improved access to education, health, training and job opportunities relevant to their needs.

## **City Cluster**

3.4.4. Office and employment growth will be successfully accommodated by a cluster of dynamic, attractive, sustainably designed and appropriately scaled tall buildings, providing an iconic view of the City and enhancing its role as a global hub for innovation in finance, professional services, commerce and culture. Complementary retail, leisure, cultural and educational facilities will support the City's primary business function, principally through animating ground floor spaces. Additional greening will be provided within and on buildings and in the public realm and air quality improved. An area wide approach will be taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high-quality public realm and environment that reflects the status of the area. Freight and servicing deliveries will be reduced through off-site consolidation, the re-timing of deliveries outside of peak hours and joint working with occupiers. Pedestrian movement and permeability will be improved with priority given to pedestrians through the reallocation of road space on key routes during daytime. Opportunities for cycling to, from and within the Cluster will be improved alongside measures to improve pedestrian access. Links to public transport nodes and other parts of the City, including to the Elizabeth Line at Liverpool Street Station, will be improved.

## **Fleet Street and Ludgate**

3.4.5. The role of Fleet Street as a centre for the judiciary and related business in the City will be enhanced by the potential development of a new court building and City of London Police Station. Partnership working with TfL will deliver safety improvements to the junction at Ludgate Circus. The role of Ludgate Hill as the primary approach to St Paul's Cathedral will be enhanced. Existing office accommodation will be retained and improved to provide flexible floorspace and spaces to meet changing business needs. Public realm and transportation improvements will deliver a high quality environment which enhances the Principal Shopping Centre, the retail link and the historic lanes, alleyways, churchyards and spaces that lead off the processional route of Fleet Street and Ludgate Hill. Additional greening within the public realm and on buildings, where appropriate, will deliver visual improvements and improvements in air quality. Residential development will be concentrated in lanes in and near identified residential areas and alleyways away from Fleet Street and Ludgate Hill to ensure a higher quality residential environment for residents.

## **Smithfield and Barbican**

3.4.6. The Elizabeth Line will significantly enhance public transport accessibility in this part of the City. The Culture Mile initiative including relocation of the Museum of London to Smithfield and renewal of the existing Barbican Centre will provide outstanding cultural facilities in landmark buildings. Beech Street will be transformed into a more welcoming environment, with significantly improved air quality, and the Beech Street/Long Lane axis will be the focus for a variety of retail units. The wider area will contain a broad mix of uses, including residential, office, retail, hotel, leisure and cultural, while temporary art and cultural installations will further animate the buildings and public realm. The growth of creative enterprise will be

particularly supported in this area. The public realm will be enhanced with a distinctive look and feel, creating attractive streetscapes and vistas. Evening and night-time activities will expand and will be well-managed to protect residential amenity. Consolidation of the City Corporation's wholesale markets onto a single site outside of the City will allow the re-use of Smithfield Meat Market in whole or in part for other uses compatible with its heritage status and the City Corporation's ambitions for Culture Mile. St Bartholomew's Hospital will remain a major centre of health excellence. Additional greening, new open spaces and pedestrian and cycling priority in appropriate locations will reduce the potential for conflict between vehicular access to commercial and residential uses, allowing for more effective management of the increased numbers of pedestrians.

### **Liverpool Street**

3.4.7. The area will be enhanced, taking advantage of improvements in public transport accessibility brought by the opening of the Elizabeth Line, and opportunities presented by the remodelling of Broadgate. Pedestrian routes will be enhanced, and active frontages provided at ground floor level to animate and add vibrancy to the area. Retail uses will be encouraged, and improvements delivered to the public realm around Liverpool Street Station. Additional greening will help to deliver air quality and biodiversity improvements. Office use will continue to be the predominant use but will provide more flexible and collaborative space to meet the needs of potential start-ups and allow for business growth. Collaborative working between businesses in this area, Tech City and creative industries within Culture Mile will create an attractive and vibrant business eco-system.

### **Strategic Objective:**

3.4.8. To ensure that the challenges facing the Key Areas of Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres.

## **3.5. The Spatial Strategy**

3.5.1. To deliver the City Corporation's Vision and Strategic Objectives, a balance needs to be struck between the competing demands for further commercial and office growth, the rapidly growing workforce, the growing cultural and visitor economies and the needs and expectations of the City's permanent residential population. An overarching imperative is to ensure that the City of London transitions to a zero carbon and zero emission City, improving air quality and delivering additional greening to the City's buildings and spaces.

3.5.2. The Local Plan will be implemented alongside the policies and strategy of the London Plan, and particularly the London Plan's principles of Good Growth. The City Plan 2036 Spatial Strategy and the detailed policies that follow set out how the balance between commercial, residential, cultural and environmental

aspirations will be delivered and how the City of London will become a healthy, socially and economically inclusive City for all.

3.5.3. Table 1 shows the scale of the projected growth in the main land uses in the City over the period 2016 to 2036. These projections pre-date the Covid-19 pandemic but the fundamental advantages and principles underpinning growth in the City remain and, over the longer term life of this Plan to 2036, growth is expected in line with the projections.

Land Use	2016-2021	2021-2026	2026-2031	2031-2036	Total
Offices	750,000sqm	750,000sqm	250,000sqm	250,000sqm	2,000,000sqm
Retailing	73,500	73,500	24,500	24,500	196,000sqm
Housing	Average 141pa 2016- 2019; 146pa 2019-2036				2,905
Hotels	Average 166pa				2,670 rooms

Table 1: indicative scale and phasing of growth in land uses 2016-2036

3.5.4. The distribution of the development set out in Table 1 reflects the City's primary business function and the expectation that office development will continue to be the main land use and acceptable form of development across the City. Table 2 illustrates the scale of development that could take place in each of the Key Areas of Change and the rest of the City through the implementation of the policies in this Plan and the development pipeline. The figures are not prescriptive and are presented as percentage ranges.

Key Area	Offices	Retailing	Hotels	Housing
Smithfield and Barbican	0 -10%	10 – 20%	10 – 20%	20 – 30%
Fleet Street & Ludgate	10 - 20%	0 – 10%	0 – 10%	0 – 10%
Liverpool Street	10 – 20%	40 – 50%	0	0
Aldgate, Tower & Portsoken	0 – 10%	0 – 10%	10 – 20%	10 – 20%
City Cluster	50 - 60%	10 – 20%	0 – 10%	0
Pool of London	0 – 10%	0 – 10%	0	0
Blackfriars	0 – 10%	0	0	0
Rest of the City	10 – 20%	20 – 30%	30 – 40%	30 – 40%

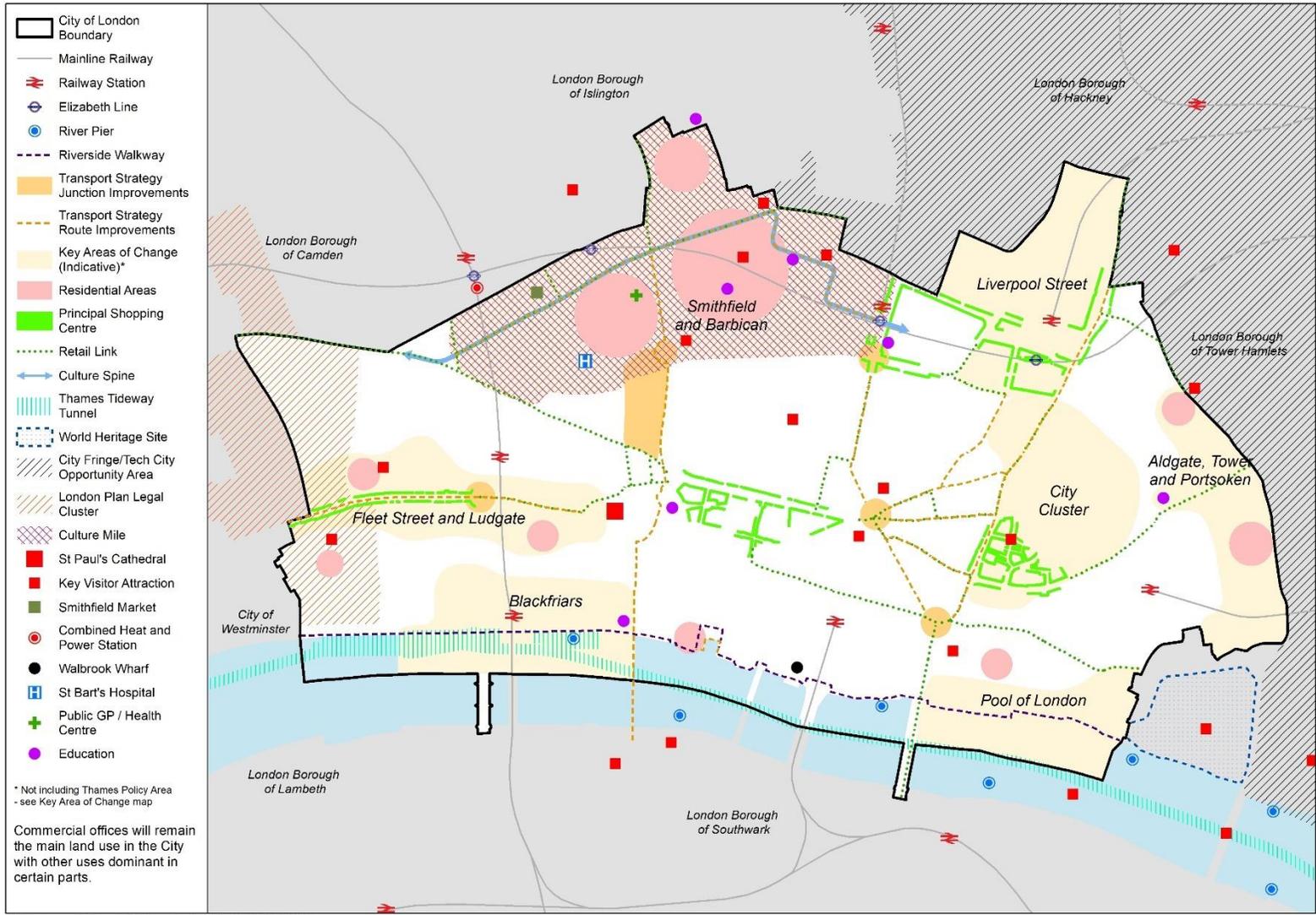
Table 2: Indicative distribution of development (% of floorspace, % hotel bedrooms and % housing units)

## Spatial Strategy

The City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK:

1. Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City by 2040, delivering further urban greening and improving air quality;
2. Delivering sustainable growth following the Covid-19 pandemic, including a minimum of 2 million m<sup>2</sup> net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone;
3. Broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses;
4. Supporting the development of cultural facilities and uses and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative;
5. Delivering at least 2,482 additional homes within the City by 2035/36 to meet housing need and continuing to deliver new housing on City Corporation estates and other appropriate sites outside of the City;
6. Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site;
7. Encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres;
8. Identifying seven Key Areas of Change where significant change is expected in the period to 2036 and providing a policy framework to guide sustainable change in those areas;
9. Balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces;
10. Ensuring that development and infrastructure provision are compatible with the radical transformation of the City's streets set out in the City's Transport Strategy;
11. Promoting greater use of the River Thames, regenerating and enhancing the City's riverside and reducing the risk of flooding.

3.5.5. The spatial strategy is illustrated indicatively on the Key Diagram and in other figures and diagrams used in this Plan.



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Figure 4: Key Diagram

# 4. Contribute to a Flourishing Society

## 4.1. Healthy and Inclusive City

### Context

- 4.1.1. The City of London is a very densely built up area with a large daytime population and limited open space. The City's economic success means there is a high level of construction activity, while the density of development and employment, delivery and servicing requirements and the narrowness of many of the City's streets all contribute to traffic congestion. This can result in poor air quality, noise and light pollution and a shortage of adequate open spaces, play and recreational spaces, impacting on the health of residents, workers and visitors.
- 4.1.2. The NPPF and the London Plan stress the importance of health and wellbeing and the role that the planning system can play in improving this. Planning can support strategies to improve health and cultural wellbeing and promote healthy communities. Planning decisions can have an influence on people's health, particularly through the design and management of new development.
- 4.1.3. The City Corporation is committed to enabling a socially and economically inclusive environment in which nobody is disadvantaged. Everyone should have equal opportunities to access buildings, spaces, job and training opportunities and health, leisure and educational services. An inclusive environment is one that recognises that everyone benefits from improved accessibility including disabled people, older people, families with children, carers, people with temporary medical conditions or impaired mobility and people who do not consider themselves disabled. An inclusive City allows all communities, irrespective of their social and economic position, to equally access the opportunities the City offers. This includes communities in neighbouring boroughs that should feel welcome to share in and contribute towards the City's success.
- 4.1.4. An important element of this commitment is breaking down unnecessary physical barriers and exclusions arising from the poor design of buildings and spaces. The needs of disabled people should be considered at an early stage of the planning process and not considered separately from the needs of others.
- 4.1.5. A wide range of elements contribute to a healthy and inclusive environment. The transport and design policies in this Plan address relevant issues such as: Healthy Streets, active travel and permeability; inclusive transport; mitigating the impacts of pollution through the design of streets and public spaces; and providing adequate shade and shelter. Green infrastructure policies highlight the benefits to health and wellbeing of open spaces and greenery within the urban environment.

### **Strategic Policy S1: Healthy and Inclusive City**

The City Corporation will work with a range of partners to create a healthy and inclusive environment, promote social and economic inclusivity and enable all communities to access a wide range of health, education, recreation and leisure opportunities, by:

1. Implementing the principles of the City of London Corporation Joint Health and Wellbeing Strategy;
2. Ensuring that the construction, design, use and management of buildings and the public realm helps to protect and improve the health of all the City's communities;
3. Requiring Health Impact Assessments of different levels depending on the scale and impact of the proposed development;
4. Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled people, older people and people with young children;
5. Expecting developers and development to:
  - engage with neighbours before and during construction to minimise adverse impacts;
  - promote healthy buildings and the use of relevant standards that measure health and well-being in buildings;
  - improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5;
  - respect the City's quieter places and spaces;
  - limit unnecessary light spillage and 'sky glow'; and
  - address land contamination, ensuring development does not result in contaminated land or pollution of the water environment.
6. Protecting and enhancing existing public health and educational facilities, including St Bartholomew's Hospital and existing City schools, working in partnership with neighbouring boroughs to deliver accessible additional educational and health facilities in appropriate locations;
7. Encouraging the further provision of both public and private health facilities. Conditions may be attached to permissions for public healthcare facilities to ensure their future retention;
8. Promoting opportunities for training and skills development to improve access to employment, particularly for City residents and those in neighbouring boroughs;
9. Supporting facilities for the provision and improvement of social and educational services through the City's libraries;
10. Supporting nursery provision and additional childcare facilities;

11. Protecting and enhancing existing community facilities and providing new facilities where required; and
12. Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities, within major developments and public realm improvements.

#### Reason for the policy

4.1.6. The City Corporation's Joint Health and Wellbeing Strategy considers three distinct populations with different needs and health issues: residents, workers and rough sleepers. Using data from the City and Hackney Joint Strategic Needs Assessment, it identifies five priorities for health and wellbeing in the City:

- Good mental health for all;
- A healthy urban environment;
- Effective health and social care integration;
- All children have the best start in life; and
- Promoting healthy behaviours.

4.1.7. The Local Plan has a particular role in delivering a healthy urban environment, as it can address issues such as poor air quality; relatively high levels of noise; a lack of green space, community space and space to exercise; some overcrowding of the housing stock; and road safety. The Joint Health and Wellbeing Strategy notes there is strong evidence that the environment shapes wider health outcomes and it seeks to "*ensure health and wellbeing issues are embedded into the Local Plan and major planning applications.*"

4.1.8. The City's population differs from other areas in that the daytime population is dominated by workers, with residents forming a small but important community. The number of City employees and residents is forecast to increase during the Plan period, placing additional demands on the provision of health, education and social services to the working and resident populations. City workers may find it difficult to access health services where they live due to their working hours and the provision of additional clinics and pharmacy services in the Square Mile could play an important role in addressing their health needs.

4.1.9. The small permanent residential population in the City means that it is often not economic to deliver effective services for City residents from locations within the City. The City Corporation therefore works jointly with neighbouring boroughs and service providers to ensure that cost effective services can be provided. For example, the City Corporation is working jointly with Islington to deliver the City of London Primary Academy Islington on a site which crosses the City/Islington boundary. The City Corporation will work with the City and Hackney Clinical Commissioning Group and other NHS and community organisations to regularly assess the need for health and social care facilities locally and sub-regionally.

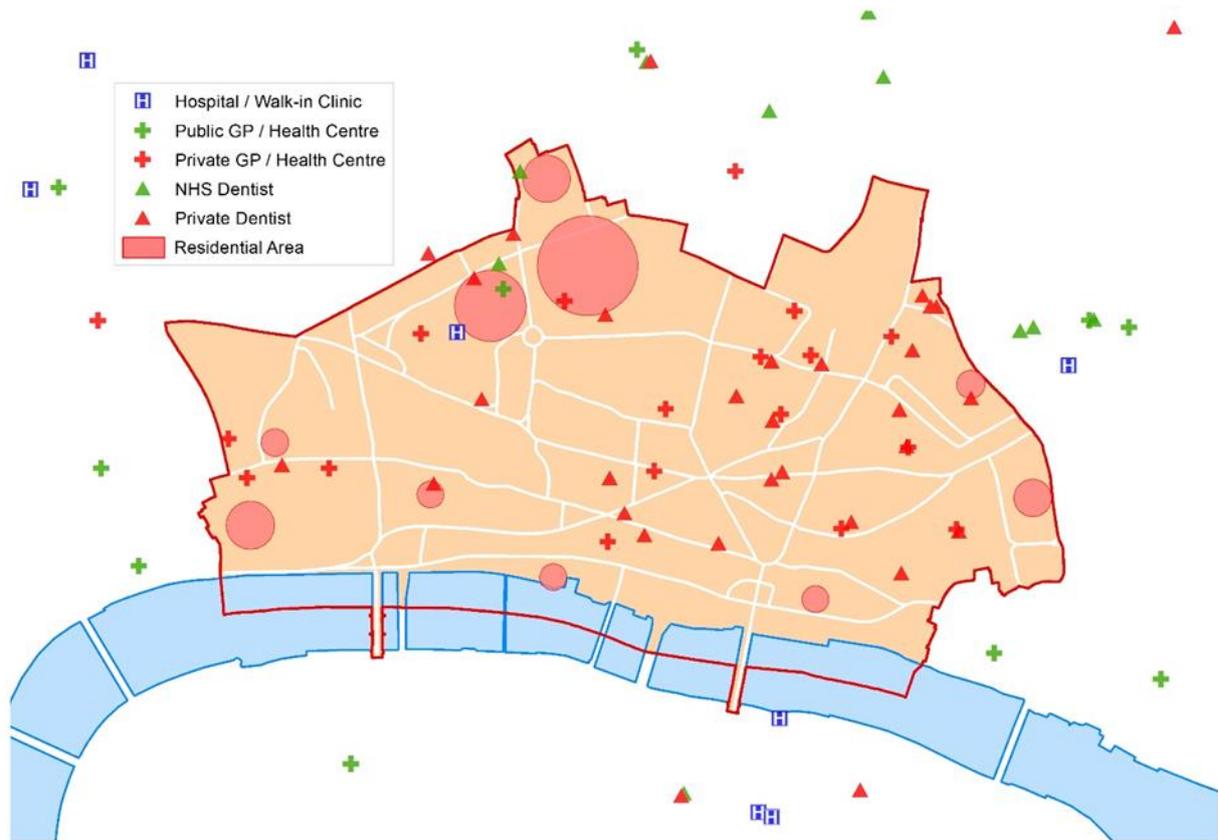


Figure 5: Distribution of health facilities in and adjoining the City

4.1.10. The City is intensively occupied with large numbers of people working in office buildings in close proximity. Many City employees work long hours and access leisure, medical and entertainment opportunities within or close to their place of employment. Research suggests that a poor working environment can have a negative impact on the health of workers, and consequently their productivity. It is therefore important that buildings are designed to promote the health and wellbeing of everyone.

4.1.11. Advances in technology and an awareness of how office environments can impact people’s mental and physical health has highlighted the importance of striving to create a healthy City environment. A sense of community inclusion and belonging is important for both physical and mental health. People who live in cohesive communities with a wide range of employment opportunities, services, infrastructure and low crime are less likely to suffer poor health. The City Corporation established the Business Healthy programme in 2017 to support businesses to promote the health and wellbeing of their employees.

4.1.12. Outdoor spaces and the public realm are under increasing pressure to provide places for relaxation, amenity and flexible working. The location and nature of the City means that perceptions of tranquillity and quieter areas are often based on the relative noise levels of an area compared to its surroundings, rather than absolute noise levels. The City Corporation’s Noise Strategy 2016-2026 supports the creation of tranquil areas in the City and promotes awareness of the importance of protecting and enhancing these locations where possible. Examples of quieter

areas in the City are open spaces, parts of the Riverside Walk, churchyards and housing estates. Research on traffic noise has found that long-term exposure to noise above a certain level can have negative impacts on physical and mental health. It is therefore important to protect the relative tranquillity of some of the City's open spaces to confer benefits to health and wellbeing by providing places of respite from the City's generally high ambient noise levels.

4.1.13. The City is a relatively affluent area and is the third least deprived local authority area in London. However, disparities exist. While the Barbican is amongst the 20% least deprived residential areas in England, Mansell Street and Petticoat Lane areas are amongst the 40% most deprived. The Local Plan can play a part in tackling such disparities, for instance by securing training and skills programmes through planning obligations associated with major development schemes.



Figure 6: Distribution of skills and education facilities in and adjoining the City

## How the policy works

- 4.1.14. To protect and enhance people's physical and mental health, new development should be designed to promote physical activity and well-being, through appropriate arrangements of buildings and uses, access, increased green infrastructure, and the provision of facilities to support walking and cycling. This could include the provision of land or spaces for food growing, which can help promote a more active lifestyle, improve social cohesion and mental and physical health and well-being.
- 4.1.15. To facilitate the delivery of a healthy city, developers should engage with neighbours before and during construction to ensure impacts on the amenity of neighbours can be minimised.
- 4.1.16. Developers are encouraged to use established assessment methodologies to ensure that development contributes towards a healthy city. There are several accreditation systems that attempt to measure the health and well-being elements of building design, construction and operation and how these features impact on health and wellbeing.
- 4.1.17. Major commercial developments should seek to reach outwards into the community by providing services and facilities which can benefit wider health and contribute to ambitions to reduce single use plastics and other waste through the use of public drinking fountains, as well as providing defibrillators and publicly accessible toilets, for example through membership of the Community Toilet Scheme. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.
- 4.1.18. Major commercial developments are also encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and well-being of the City's communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations.
- 4.1.19. Changes to the Use Classes Order introduced in September 2020 have included certain health and medical services such as clinics, health centres, creches, day nurseries and day centres within the new Use Class E. This means that such uses could be converted to a range of other Class E commercial, business and service uses without planning permission. Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.

## **Policy HL1: Inclusive buildings and spaces**

Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design, ensuring that the City of London is:

1. inclusive and safe for all, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
2. convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
3. responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### Reason for the policy

4.1.20. The built environment needs to be safe, accessible and convenient to improve the quality of life for all City users and particularly for disabled and elderly people and those with other mobility difficulties. Despite progress in building a more accessible City, some people still experience considerable barriers to living independent and dignified lives as a result of the way the built environment is designed, built and managed. The outcome of embracing inclusive design should be a City where people want to live, work and visit and which feels open and welcoming to people from different backgrounds.

### How the policy works

4.1.21. Developers will be required to submit Design and Access Statements which demonstrate a commitment to inclusive design and engagement with relevant user groups, including health and social care providers. Such engagement should take place at the detailed design stage prior to submission of an application to ensure maximum effectiveness and inclusive design within the building and in the surrounding public realm. Design and Access Statements must include details both on how best practice standards have been complied with and how inclusion will be maintained and managed throughout the lifetime of the building.

## **Policy HL2: Air quality**

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment;
2. Development that would result in a worsening of the City's nitrogen dioxide or PM<sub>10</sub> and PM<sub>2.5</sub> pollution levels will be strongly resisted;
3. All developments must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>);

4. Developers will be expected to install non-combustion energy technology where available;
5. A detailed Air Quality Impact Assessment will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation;
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments;
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants.

#### Reason for the policy

- 4.1.22. Due to its location at the heart of London and the density of development, the City of London has high levels of air pollution. Poor air quality can harm human health, particularly for young people while their lungs are developing, and increase the incidence of cardiovascular and lung disease. The City, in common with all central London, has been declared an Air Quality Management Area, due to national health-based objectives for the pollutants nitrogen dioxide (NO<sub>2</sub>) and small particles (PM<sub>10</sub>) not being met.
- 4.1.23. The City Corporation is working with a wide range of organisations to address this problem and levels of NO<sub>2</sub> are falling, although the health-based limits are still not met everywhere in the Square Mile. The City Corporation's Air Quality Strategy aims to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation (WHO) Guidelines for NO<sub>2</sub> by the beginning of 2025. Limits set in European Directives for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) are generally met in the City, except adjacent to the busiest roadsides in unfavourable weather conditions. However, the WHO has identified health impacts even at very low concentrations. The Air Quality Strategy aims to support the Mayor of London to meet the tighter WHO Guidelines for PM<sub>10</sub> and PM<sub>2.5</sub> by 2030.
- 4.1.24. The City Corporation's Transport Strategy contains proposals to reduce air pollution associated with road traffic in the Square Mile, including the introduction of local Zero Emission Zones covering Barbican and Golden Lane and the City Cluster by 2022. An interim two-way Zero Emission Street at Beech Street will be implemented in 2020. While the main source of pollutants in the City has

historically been road transport, following implementation of the Mayor's Ultra Low Emission Zone in 2019 it is forecast that a greater share of remaining air pollutants will be generated by buildings. It is predicted that by 2020 buildings will account for over half of NO<sub>2</sub> emissions arising in the City. Tackling poor air quality requires a broad range of actions, including reducing traffic congestion and supporting low emissions vehicles, reducing emissions associated with combustion-based heating and cooling systems, and limiting emissions linked with demolition and construction. The addition of green space and planting on and around buildings and within the public realm can help to trap particulate pollution.

#### How the policy works

- 4.1.25. The City Corporation's Air Quality Strategy provides detailed information on the air quality issues facing the City and actions being pursued by the City Corporation and a range of partners to improve air quality. The Air Quality SPD sets out specific guidance for developers on the City Corporation's requirements for reducing air pollution from developments within the Square Mile. The City Corporation's Code of Practice for Deconstruction and Construction Sites and the Mayor's Control of Dust and Emissions during Construction and Demolition SPG provide guidance on procedures to be adopted to minimise the impacts of demolition and construction activities on air quality.
- 4.1.26. Developers will be required to manage the impact of their proposals on air quality, which should as a minimum be air quality neutral. Large-scale developments that are subject to Environmental Impact Assessment procedures should, in particular, propose methods of delivering an air quality positive approach which results in improvements to the City's air quality. The Mayor of London intends to produce guidance to inform the preparation of statements for developments taking an air quality positive approach.

#### **Policy HL3: Noise and light pollution**

1. Developers must consider the noise and lighting impacts of their development.
2. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.
3. A noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces.
4. Any potential noise or light pollution conflicts between existing activities and new development should be minimised. New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.

5. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development.
6. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
7. Opportunities will be sought to incorporate improvements to the acoustic environment and existing lighting schemes within major development.

#### Reason for the policy

- 4.1.27. The City has a complex, densely developed and intensively used built environment in which space is at a premium and where multiple activities occur in very close proximity. Therefore, the effective management of noise and light pollution impacts applies to both development that introduces new sources of noise and light pollution and development that is sensitive to noise and light pollution.
- 4.1.28. Careful planning and design are required to ensure proper consideration of key issues where lighting has an impact such as movement, safety, security as well as the reduction of energy use and light pollution. Light pollution is a particular problem where large commercial buildings have lights on during the night, which can impact residential amenity.
- 4.1.29. The main noise and vibration sources related to new developments in the City are:
- Construction and demolition work and associated activities, such as piling, heavy goods vehicle movements and street works;
  - Building services plant and equipment, such as ventilation fans, air-conditioning and emergency generators;
  - Leisure facilities and licensed premises, involving noise from people and amplified music; and
  - Servicing activities such as deliveries, window cleaning and building maintenance.
- 4.1.30. Noise and light sensitive uses and developments in the City include residential developments (including hotels and serviced apartments), health facilities, schools and childcare provision and certain open spaces.
- 4.1.31. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing to enable consistency of advice and decision making. Policy CV4: Evening and Night-Time Economy sets out the planning policy approach to evening and night-time entertainment uses in the Square Mile.

### How the policy works

- 4.1.32. The City of London Noise Strategy 2016-2026 sets out the strategic approach to noise in the City and the City Corporation's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise and vibration impacts of development. The use of planning conditions or obligations will be considered where this could successfully moderate adverse effects, for example, by limiting hours of operation.
- 4.1.33. When bringing forward major development proposals, developers are encouraged to consider whether there may be opportunities to enhance the existing acoustic environment, for instance by incorporating water features that can aid relaxation and help to mask traffic noise. More information about this can be found in the City Corporation's Noise Strategy.
- 4.1.34. For noise sensitive developments, confirmation will be sought of appropriate acoustic standards at the design stage. The City Corporation will apply the 'agent of change' principle, meaning that the responsibility for mitigating the impact of noise will fall on the new development.
- 4.1.35. The City Corporation has adopted a Lighting Strategy, which includes a range of proposals to improve the quality of lighting across the City with specific recommendations for different character areas. The Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises, and from signage. The redevelopment or refurbishment of buildings may present opportunities to reduce the impacts of existing insensitive lighting schemes. Lighting proposals should take account of impacts on biodiversity and should be designed to ensure an appropriate habitat to improve biodiversity in the City. Particular attention should be paid to the impact of lighting on the City's bat population.

### **Policy HL4: Contaminated land and water quality**

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

### Reason for the policy

- 4.1.36. When a site is developed, and ground conditions change there is potential for contaminants to be mobilised, increasing the risk of harm. Site investigation should establish whether the proposed use is compatible with the land condition. The term "non-human receptors" encompasses buildings and other property, or ecological systems and habitats, which may be harmed as a result of contaminated land or water.

## How the policy works

4.1.37. Pre-application discussions will be used to identify the particular issues related to environmental protection that are relevant to each development site. The City Corporation has published a Contaminated Land Strategy and a Contaminated Land Inspection Strategy, which provide details of the issues likely to be encountered in different parts of the City and should be used for reference by developers.

### **Policy HL5: Location and protection of social and community facilities**

1. Existing social and community facilities will be protected in situ unless:
  - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another social or community use on the site.
2. The development of new social and community facilities should provide flexible, multi-use spaces suitable for a range of different uses and will be permitted:
  - where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
  - in locations which are convenient to the communities they serve;
  - in or near identified residential areas, providing their amenity is safeguarded; and
  - as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
3. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

## Reason for the policy

4.1.38. Social and community facilities contribute to successful communities by providing venues for a wide range of activities and services. As such they make a significant contribution to people's mental, spiritual and physical well-being, sense of community, learning and education. Library and educational facilities and those that support the City's business and cultural roles are particularly important. A definition of social and community facilities, with reference to the Use Classes Order, is provided in the glossary.

## How the policy works

- 4.1.39. Existing social and community facilities will be protected in situ, unless it can be demonstrated to the City Corporation's satisfaction that there is no demand from social and community users for the facilities or that their loss is part of a published asset management plan, in the case of non-commercial enterprises, or that necessary services can be delivered from alternative premises without a reduction in service provision. The presumption is that current facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to another social and community use in the first instance.
- 4.1.40. Where existing social and community facilities are to be relocated, the replacement facilities should be within the City. However, for services that serve a wider catchment area, relocation outside the City, but within a reasonable distance, may be acceptable. There may be advantages in locating organisations together within multi-functional community buildings to maximise the efficient use of resources. For example, the Artizan Street Library hosts community meeting rooms, play groups and exercise classes as well as traditional library facilities. Places of worship have the potential to accommodate a range of activities on their premises which can help improve community cohesion. Relocated facilities must be available to communities at a cost/rent equivalent to that charged prior to redevelopment. New facilities provided should similarly provide space at a cost/rent that is affordable to the communities being served.
- 4.1.41. Where rationalisation of services would result in either the reduction or relocation of social and community floorspace, the replacement floorspace must be of a comparable size or provide a better quality of service to target communities.

### **Policy HL6: Public toilets**

The City Corporation will promote a widespread distribution of publicly accessible toilets which meet public demand by:

- requiring the provision of a range of directly accessible public toilet facilities in major retail, leisure and transport developments, particularly near visitor attractions, public open spaces and existing major transport interchanges. Provision should be made for disabled people and their carers (changing places toilets). Publicly accessible toilets should be available during normal opening hours, or 24 hours a day in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing publicly accessible toilets as a result of redevelopment, and requiring the provision of replacement facilities, unless adequate provision is available nearby; and
- requiring the renewal of existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

## Reason for the policy

4.1.42. Inclusive and accessible toilet provision is essential to meet the needs of all communities. Publicly accessible toilets are a particularly important facility for a number of groups, such as the elderly, those with disabilities, people with babies and young children, pregnant women and others with chronic illnesses. They are also important to meet the needs of tourists and visitors to the City. It is important when designing toilet provision to include cubicles for people with ambulant mobility impairments which can also be suitable for some older people and people who require additional space.

4.1.43. Areas of the City with concentrations of night-time entertainment require adequate publicly accessible toilet provision to prevent fouling on the streets.

## How the policy works

4.1.44. The City Corporation will require the provision of publicly accessible toilets in major retail, leisure, transport and commercial developments, secured through legal agreements, or through encouraging membership of the Community Toilet Scheme. The Community Toilet Scheme allows the public to use toilet facilities in participating businesses, albeit that hours are often restricted.

4.1.45. Publicly accessible toilets should be clearly signposted to ensure they are easily found. The City Corporation has produced a free toilet finder app suitable for use on mobile phones. Facilities should be maintained by the owner as part of the overall maintenance of any development.

4.1.46. 'Changing places' toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, rather than as a replacement. Where publicly accessible toilets are provided, consideration should be given to the provision of self-contained gender-neutral toilets.

## **Policy HL7: Sport and recreation**

1. Existing public sport and recreational facilities will be protected in situ, unless:

- replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or
- necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- it has been demonstrated through active marketing, at reasonable terms for sport and recreational use, that there is no demand for the existing facility or alternative sport and recreation facilities which could be met on the site.

2. The provision of new sport and recreation facilities, particularly publicly accessible facilities, will be encouraged:

- where they provide flexible space to accommodate a range of different uses/users and are accessible to all;

- in locations which are convenient to the communities they serve, including open spaces;
- near existing residential areas;
- as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses; and
- where they will not cause undue disturbance to neighbouring occupiers.

3. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

### Reason for the policy

4.1.47. There has been an increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities within office developments and some hotels. The rapid growth in the working population, as well as the increasing recognition of the importance of healthy lifestyles, means there is a continued demand for these facilities.

### How the policy works

4.1.48. The City Corporation will protect existing public sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current public facilities and uses should be retained where a continuing need exists. If this is not feasible, preference will be given to a similar type of sport and recreational use in the first instance.

4.1.49. The loss of private facilities such as gyms through redevelopment or change of use will be permitted where the replacement uses meet other objectives in this Plan. Following changes to the Use Classes Order introduced in September 2020, existing gyms and other indoor recreational uses could be converted to a range of alternative Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.

4.1.50. Open spaces and publicly accessible rooftops can provide valuable formal or informal sports and recreational facilities in the densely built City environment. An imaginative approach to multi-purpose structures in outdoor spaces can allow seating and other street furniture to be designed to also facilitate physical activities that promote health and fitness, such as stretching, sit ups and markers for walking and running distances. Outdoor exercise is beneficial but those exercising need to be mindful of the safety of others and the busy city centre context.

## **Policy HL8: Play areas and facilities**

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas where a need has been identified, by:
  - protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
  - requiring external play space and facilities as part of major new residential developments;
  - where the creation of new play facilities is not possible, requiring developers to work with the City Corporation to deliver enhanced provision nearby, or provide financial contributions to enable the provision of facilities elsewhere; and
  - promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas.
2. Play areas and facilities must be inclusive and not be located in areas of poor air quality due to the negative health impacts on young children.

### Reason for the policy

4.1.51. Play is essential for the healthy development of children and takes place in both formal and informal spaces. Formal play spaces include areas specifically designed and designated for play.

### How the policy works

4.1.52. The high rate of development in the City and the creation of new, and improvement of existing, public realm creates opportunities for informal play spaces in the City, which are not designated solely for that purpose but contain features that can be used for imaginative play. These spaces would also benefit the increasing numbers of children who visit the City.

4.1.53. Public realm improvements and the creation of new open spaces should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. Where the opportunity arises, the City Corporation will enable appropriate sensory play areas in the City for children, young people and adults with special educational needs and disabilities.

## **Policy HL9: Health Impact Assessment (HIA)**

The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts by:

1. requiring all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist; and
2. requiring a Rapid or Full HIA to be submitted for larger-scale development proposals.

The scope of any HIA should be agreed with the City Corporation and be informed by City Corporation guidance on HIA. The assessment should be undertaken as early as possible in the development process so that potential health gains can be maximised, and any negative impacts can be mitigated.

### Reason for the policy

4.1.54. The City of London is a densely built up central urban location. The scale of development, the busy and congested streets and pavements, limited open space and large numbers of workers can impact on people's physical and mental health.

4.1.55. Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets.

4.1.56. HIAs provide a systematic framework to identify the potential impacts of a development proposal on the health and wellbeing of the population and highlight any health inequalities that may arise. The Covid-19 pandemic has highlighted the important role that health impact assessments can play in enabling developers to understand and plan for potential risks to health and wellbeing.

4.1.57. HIAs can highlight mitigation measures that may be appropriate to enable developments to maximise the health of communities.

### How the policy works

4.1.58. Developers will be expected to identify potential impacts on health resulting from all major developments in the City. To assist this process, the City Corporation will publish guidance based on the NHS London Healthy Urban Development Unit's (HUDUs) HIA methodology but adapted to address City specific issues.

4.1.59. In line with the Mayor of London's Social Infrastructure SPG, the level of HIA required will depend upon the scale and impact of the development.

## **Desktop assessment**

- 4.1.60. This draws on existing knowledge and evidence, often using published checklists which provide a broad overview of potential health impacts. The City Corporation will prepare a Healthy City Planning checklist for this purpose, which will incorporate relevant elements of TfL's Healthy Streets Check to ensure that land-use and transport impacts on health are considered in a coordinated way.
- 4.1.61. The Healthy City Planning checklist should be submitted with planning applications for developments of between 10 and 99 dwellings or between 1,000m<sup>2</sup> – 9,999m<sup>2</sup> of commercial floorspace. It will also be required for developments considered to have particular health impacts, including those involving sensitive uses such as education, health, leisure or community facilities, publicly accessible open space, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent.

## **Rapid HIA**

- 4.1.62. This would require a more focused investigation of health impacts which would normally recommend mitigation and/or enhancement measures. The City Corporation will adapt the London HUDU Rapid HIA Tool to reflect the City's circumstances and will expect this to be used for developments of 10,000m<sup>2</sup> or greater commercial floorspace or 100 or more residential units.

## **Full HIA**

- 4.1.63. This involves comprehensive analysis of all potential health and wellbeing impacts, which may include quantitative and qualitative information, data from health needs assessments, reviews of the evidence base and community engagement. A full HIA will be required on those developments that are subject to an Environmental Impact Assessment and could be included within the Environmental Statement to avoid duplication.
- 4.1.64. HIAs must look at the issue of health comprehensively, and not focus solely on access to health services. Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

## 4.2. Safe and Secure City

### Context

4.2.1. The City is a safe place to live, work and visit, with low rates of crime. The continuing security and safety of the City is key to its success, whether as a base for a company, a place to live or somewhere to spend leisure time. As a world leading financial and professional services centre, addressing potential risks from fraud, terrorism and cyber crime is of critical importance.

4.2.2. The City of London has its own police force, which enables it to focus on the City's specific circumstances while playing a leading national role in combatting economic and cyber crime. The City of London Police publish a three-year Policing Plan, updated annually, which sets out priorities that address both its national and local obligations. Current priorities are:

- Counter terrorism;
- Cyber crime;
- Fraud;
- Vulnerable people;
- Roads policing;
- Public order;
- Violent and acquisitive crime;
- Antisocial behaviour.

4.2.3. The Safer City Partnership brings together representatives from both statutory and non-statutory agencies that contribute to the work of keeping the City safe. The Partnership's vision is for the City of London to be a safe place to live, learn, work, and visit. The Partnership meets regularly and publishes a Strategic Plan, which identifies the following outcomes for 2019-2022:

- Vulnerable people and communities are protected and safeguarded;
- People are safe from violent crime and violence against the person;
- People and businesses are protected from theft and fraud/acquisitive crime;
- Anti-Social Behaviour is tackled and responded to effectively;
- People are safe and feel safe in the Night-Time Economy.

4.2.4. The Secure City programme is a joint initiative between the City Corporation and City of London Police, intended to deliver significant improvements to the safety of residents, workers and visitors. Drawing on the success of historic approaches to security and the latest examples of best practice from cities across the world, the programme will future-proof security arrangements to meet emerging challenges such as protecting new crowded spaces. The programme will integrate with other

initiatives including Smart City technology and Culture Mile and will align with this Plan and the City Corporation's Transport Strategy.

4.2.5. The City is home to the Central Criminal Court at the Old Bailey, the Rolls Building court complex, the Mayor's and City of London Court, the City of London Magistrate's Court and The Inner and Middle Temples Inns of Court, together with a number of legal firms.

### **Strategic Policy S2: Safe and Secure City**

The City Corporation will work with the City of London Police and the London Fire Brigade to ensure that the City is secure from crime, disorder and terrorism, and is able to accommodate large numbers of people safely and efficiently by:

1. Minimising the potential for crime and anti-social behaviour by ensuring that development proposals design out crime and encouraging a mix of uses and natural surveillance of streets and spaces;
2. Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole;
3. Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;
4. Ensuring that development proposals take account of the need for resilience so that residential and business communities are better prepared for, and better able to recover from, emergencies (including the promotion of business continuity measures);
5. Requiring development proposals to meet the highest standards of fire safety. Major development proposals must prepare and submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building.

#### Reason for the policy

4.2.6. Safety and security are important to the continuing role of the City of London as a world leading financial and professional services centre, and as an attractive place to live and visit. Ensuring a safe and secure City requires close co-operation between the City Corporation, the City of London Police and the London Fire Brigade, and between these agencies, the Metropolitan Police, the British Transport Police, the Government and Judiciary and the Mayor of London. Close working with developers and occupiers is also essential.

#### How the policy works

4.2.7. Security and fire safety features should be considered at the outset of the design process to be most effective and avoid the need for retrofitting later during the

development process or following completion. Early engagement with the City Corporation, the City of London Police and the London Fire Brigade is particularly important, including through the pre-application process.

4.2.8. The design of a scheme should create safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or social cohesion. Designs should take into account the most up-to-date information and advice regarding security needs in the area, working with local advisors to reduce vulnerability and increase resilience. Where appropriate, developers will be required to contribute towards the funding of measures designed to enhance security.

4.2.9. All development proposals must achieve the highest standards of fire safety and developers must liaise at an early stage in the design process with the City Corporation's District Surveyor and the London Fire Brigade on fire safety considerations, incorporating London Plan fire safety requirements. Major development proposals must be accompanied by a Fire Statement which sets out how the development will address fire safety in the design, construction and operation of the building.

### **Policy SA1: Crowded Places**

All major developments are required to address the issue of crowded places and counter-terrorism by:

- Conducting a full risk assessment;
- Undertaking early consultation with the City of London Police on risk mitigation measures;
- Restricting or rationalising motor vehicle access where required; and
- Ensuring that public realm and pedestrian permeability is not adversely impacted, and that the design of the development considers the application of Hostile Vehicle Mitigation measures at an early stage.

#### Reason for the policy

4.2.10. Places that are attractive, open and easily accessible can often become crowded. Such places are a potential target for crime and terrorism and offer the prospect of serious disruption or worse.

4.2.11. Crowded places include mainline and underground stations, shopping centres, bars and clubs which are all easily accessible. The high density of development, the substantial daytime population and the high-profile of many City buildings and businesses make the area a potential target for terrorism.

4.2.12. Measures such as traffic calming may be employed to limit the opportunity for hostile vehicle approach. Other measures that have been taken in the City include the City of London Traffic and Environmental Zone, which is the security and surveillance cordon that surrounds the Square Mile. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing,

managing and monitoring vehicular movements entering the City. In 2016, the City Corporation also approved an Anti-Terrorism Traffic Regulation Order (ATTRO), a counter-terrorism measure that allows the City of London Police to close routes at certain times, specified in the order, and divert vehicles away from the area to deal with identified threats. Its purpose is to avoid or reduce the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism.

#### How the policy works

4.2.13. A risk assessment should be submitted for approval by the City Corporation as part of a planning application for major development or transport proposals. The risk assessment should be proportionate to the nature of the risk identified through consultation with the City of London Police and will typically include:

- Assessment of the risk of structural damage from an attack;
- Identification of measures to minimise any risk;
- Detail on how the perimeter is treated, including glazing;
- Consideration of adjacent land-uses and commuter routes.

4.2.14. The City Corporation will liaise with the City of London Police in considering and approving risk assessments submitted as part of a planning application.

#### **Policy SA2: Dispersal Routes**

Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of people, minimise the potential for over-crowding and reduce the instances of noise nuisance and anti-social behaviour, particularly in residential areas.

#### Reason for the policy

4.2.15. The City increasingly operates on a 7 day a week basis, with an increase in evening and night-time uses. This will result in an increase in pedestrian movements within the City as patrons enter and exit public houses, bars, night-clubs and restaurants. Anti-social behaviour, including noise, disturbance and odours arising from the operation of the premises can be disruptive to City residents and occupiers and proposals should seek to mitigate any negative impacts that may arise, incorporating the Agent of Change principle.

4.2.16. The City's daytime population places pressure on the City's public realm at peak times. It is therefore necessary to provide details of dispersal routes as part of planning applications for major commercial developments to understand their implications for movement and amenity.

4.2.17. The planning and design of dispersal routes should take into account the needs of people with physical or mental disabilities and people with restricted mobility.

## How the policy works

- 4.2.18. The dispersal of patrons from premises, particularly late at night should not have an unacceptable impact on the amenity of residents and other noise-sensitive uses. Adverse impacts will require mitigation in line with Policy CV4: Evening and Night-time Economy.
- 4.2.19. Major commercial developments should incorporate measures to reduce pedestrian flow at peak times or provide alternative routes to avoid over-crowding on existing streets to ensure the safety and security of the City and to avoid further stress on the City's public realm.
- 4.2.20. A Management Statement will be required, setting out the measures incorporated into the scheme to mitigate the adverse impacts of night-time economy uses. Early engagement with nearby residents and occupiers, as well as the City of London Police and the City Corporation as Licensing Authority, can help ensure that the measures contained in the Management Statement are appropriate to local circumstances. Assessment of the Management Statement will have regard to the City of London Noise Strategy, the provisions of the City of London Statement of Licensing Policy and any submitted licence application operating schedule.

### **Policy SA3: Designing in Security**

1. Security measures must be incorporated into the design of development at an early stage avoiding the need to retro-fit measures that adversely impact on the public realm or the quality of design. Applicants must liaise with the City Corporation and the City of London Police and incorporate their advice into the scheme design as required.
2. Security measures should be designed within the development's boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered.
3. All development should be designed to minimise the need for Hostile Vehicle Mitigation on the public highway. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, or within a wider area where area-based security measures are proposed.
4. Where mixed use schemes are proposed, developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.
5. All security measures which are expected to be more than very short-term should be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design.
6. An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.

## Reason for the policy

4.2.21. Measures to design out crime, including counter-terrorism measures, should be integral to development proposals and may be applicable to crowded spaces around a development as well as the building itself. Security measures should be proportionate to the risk and the likely consequences of an attack, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. Late consideration of security in developments can be more costly, inefficient, and less effective, and can have a negative impact on the architectural quality and design of a building and the surrounding public realm. These difficulties can be avoided by considering security at the early design stage.

## How the policy works

4.2.22. All new developments must incorporate appropriate security provision to reduce the risk and the likely impact of an attack. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features for individual buildings on the public highway should be a last resort when all other alternative proposals have been exhausted including the scope for an area-based approach.

4.2.23. A collective approach to security is likely to be more effective than an individual building approach, particularly in areas of high-density development such as the City Cluster. The City Corporation will use s106 planning obligations requiring developers to contribute to measures to enhance collective security, where appropriate.

4.2.24. In considering the impact of new development on the public realm, the City Corporation will take into account the need for additional security measures within the public realm to reduce the risk to individuals from motor vehicles and the potential for vehicles to mount pavements. Developers will be expected to contribute towards the cost of on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, through the use of s106 planning obligations.

4.2.25. Developments should aim to achieve a high level of natural surveillance of all surrounding public areas including the highway. Mixed use developments can generate greater activity and surveillance, but a mix of uses within individual buildings may give rise to problems of security, management and amenity. The provision of independent primary and secondary access points will be required so that proposed uses are separate and self-contained. In appropriate circumstances, use of CCTV should be considered.

4.2.26. Early engagement with the City of London Police and the City Corporation is essential to ensure that security measures are appropriate to evolving threats. Where the development has an impact on heritage assets, early discussion with Historic England is also recommended.

4.2.27. Design and Access Statements should incorporate recommendations from the City of London Police, City Corporation and 'Secured by Design' principles or equivalent, setting out how security has been considered at the design stage. Advice in the City Corporation's Public Realm Technical Manual should be incorporated into proposals to ensure developments offer a lasting contribution to the streets and spaces of the City.

## 4.3. Housing

### Context

- 4.3.1. Housing is vital for the City's future economy and its communities. A shortage of housing, particularly affordable housing, is one of the main barriers to future business and community growth in the City and across London. High quality, affordable housing is also essential to meet the housing needs of those of the City's communities on lower incomes.
- 4.3.2. The permanent residential population of the City, estimated to be around 8,000, is small in comparison to the daily working population in excess of 520,000. The GLA's 2016-based projections suggest that the City's population (excluding those with main homes elsewhere) will have a modest increase to approximately 10,000 by 2036. As the City's housing stock increases the resident population does not increase in proportion as many residential units are used as second homes or for short term letting. The 2011 Census indicated that there were 1,400 second homes in the City of London.
- 4.3.3. The majority of the City's housing is concentrated around the edge of the City in four estates (the Barbican, Golden Lane, Middlesex Street and Mansell Street). Other residential areas are located in Smithfield, the Temples, parts of the riverside (Queenhithe), Fleet Street (City West), Carter Lane and around Botolph Lane. Most residential units in the City are flats with one or two bedrooms, which is consistent with the need assessment of unit sizes recommended in the City of London Strategic Housing Market Assessment (SHMA) 2016. There have also been a number of developments providing shorter term accommodation (short lets or serviced apartments).
- 4.3.4. Most new residential development has been located in or near existing residential areas in accordance with Local Plan policy. This allows greater opportunity to protect residential amenity and deliver a high-quality residential environment. Residential clustering reduces potential conflict with commercial and office uses. There may be occasional opportunities for new residential development on appropriate sites near residential areas, such as through the re-use of heritage assets, where the potential to meet future office needs may be limited by site-specific considerations.
- 4.3.5. References to housing in this Plan include market and affordable housing (comprising social rented housing, affordable rented housing and intermediate housing), hostels, sheltered and extra-care housing. It also includes innovative housing products, such as Built to Rent and Co-Living accommodation which are likely to have an increasing role in meeting future housing needs, particularly for City workers at an early stage of their careers. Student housing will contribute towards meeting general housing need at the national ratio of 2.5 student rooms to 1 residential unit.

## Housing requirement

- 4.3.6. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs.
- 4.3.7. The London Plan's strategic framework includes Policy SD5 which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context it requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. In Policy S3 the City's housing requirement is expressed as a total of 2,482 dwellings for the Plan period to 2036, which represents the 10-year London Plan target of 1,460 dwellings plus the combined annual average of 146 dwellings for the seven years post 2028/29 (1,022 dwellings). The housing requirement beyond 2028/29 will be kept under review and may need to be altered to ensure general conformity with any subsequent review of the London Plan. The London Plan also includes a target that 740 units should be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period.
- 4.3.8. Different assessment methods provide different figures for local housing need. The City's 2016 SHMA assessed the level of housing need, including the needs of those requiring supported and specialised accommodation in the City, over the period 2014-36 using the latest population and household projections. The SHMA identified an objectively assessed need for an annual average of 126 dwellings per year. Using the national standard method for assessing local housing need at the time of preparing this Plan, the City's minimum annual local housing need figure over the ten-year period from 2020 to 2030 would be 112.
- 4.3.9. The City Corporation recognises that the wider housing needs across London support the case for a higher level of housing in the City than indicated by the City's SHMA. This Local Plan therefore seeks to meet the London Plan housing target, which has been applied to the whole of the Local Plan period as explained above.
- 4.3.10. Housing delivery in the City is impacted by the volatile nature of the wider London housing market. If past volatile trends continue, new housing delivery in the City is likely to fluctuate from year to year and monitoring and delivery performance should therefore be assessed against overall delivery in the period up to 2028/29, rather than on an annual basis. The City Corporation has prepared a Housing Trajectory which shows that the supply of small and larger windfall sites, together with sites in the development pipeline, will provide sufficient capacity to meet the London Plan by 2028/29.
- 4.3.11. The City Corporation's Article 4 Direction which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of

London has been delivered through 'windfall' development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2021/22, completions and permissions on windfall sites will have delivered an annual average of 198 dwellings per year. It is anticipated that windfalls will continue to deliver the majority of housing. The City Corporation has published a brownfield land register on its website, identifying land that is suitable for residential development in accordance with government requirements.

- 4.3.12. The Mayor of London prepares a Strategic Housing Land Availability Assessment (SHLAA) for London, providing guidance on the amount of land potentially available in the City for residential development. The 2017 SHLAA prepared to inform the draft London Plan 2017 identifies a potential supply of large housing sites in the City in the period 2019-2029 of 527 dwellings and an annual average of 74 dwellings on sites under 0.25 hectares, based on past trends. This provision would be sufficient to meet London Plan housing targets up to 2029. Beyond 2029 and up to the end of the Local Plan period, it is expected that further windfalls will come forward to ensure that the City of London can meet its housing requirements for the longer term. In the event that monitoring demonstrates that insufficient housing land is coming forward, the City Corporation will review this Plan or bring forward a partial review relating to housing land supply.
- 4.3.13. The City Corporation will continue to support the delivery of new market and affordable housing on its own housing estates and other appropriate land holdings outside the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London's wider housing needs.
- 4.3.14. The City Corporation is the strategic housing authority for the City of London and a landlord responsible for over 1,900 social tenanted properties and over 900 leaseholder properties across London. The City Corporation provides over 1,500 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets. This is in addition to social housing provided within the City.
- 4.3.15. The City Corporation has committed to play a leading role in tackling the housing shortage in London with a pledge to build hundreds of new social homes and thousands of additional mixed tenure homes. The City Corporation aims to deliver at least 700 new social homes on City-owned land and housing estates with potential for renewal and expansion. Where these homes are outside of the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet both City of London and host borough housing need. The City Corporation as a strategic landowner across London is seeking to deliver a further 3,000 mixed tenure homes on other sites in partnership with other providers, in recognition of the need for additional housing across London to meet housing needs.
- 4.3.16. The City Corporation's plans to build new homes have encouraged both public and private sector partners to propose development opportunities and potential joint ventures. Options to increase the supply of new homes beyond the City

Corporation's own sites are being explored. The planned co-location of the City Corporation owned and managed wholesale markets (Smithfield Meat Market, Billingsgate Fish Market and New Spitalfields Fruit and Vegetable Market) onto one site in Dagenham would provide an opportunity for mixed use redevelopment which could include housing. Billingsgate is a 5-hectare site next to Canary Wharf and New Spitalfields is a 13-hectare site in Leyton.

### **Affordable Housing**

4.3.17. The City of London is an expensive area to live in. ONS data shows that the affordability ratio of lower quartile house prices to lower quartile residential earnings in 2016 was 17.51, above the London average of 13.32 and the England average of 6.91. The City of London SHMA shows that rental prices in the City were significantly above the London-wide average or the average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests a need for an additional 69 affordable dwellings per year to meet affordable housing needs.

### **Gypsy and traveller accommodation**

4.3.18. The London Plan indicates that, in the absence of an up to date local gypsy and traveller needs assessment, boroughs should use the need figure set out in Table 4.4 of the London Plan. This table indicates that there is no need for specific gypsy and traveller accommodation in the City of London. The City Corporation will work with the Mayor and London Boroughs in the preparation of a London-wide Gypsy and Traveller Accommodation Needs Assessment.

## **Strategic Policy S3: Housing**

The City Corporation will protect existing housing and amenity and encourage additional housing concentrated in or near the identified residential areas to meet the City's needs by:

1. Making provision for a minimum of 2,482 net additional dwellings between 2019/20 and 2035/36:
  - encouraging new housing development on appropriate sites in or near identified residential areas;
  - protecting existing housing where it is of a suitable quality and in a suitable location;
  - exceptionally, allowing the loss of isolated residential units where there is a poor level of amenity; and
  - refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy OF2.
2. Ensuring sufficient affordable housing is provided to meet the City's housing need and contributing to London's wider housing needs by:
  - ensuring the delivery of a minimum of 50% affordable housing on public sector land; and

- requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash-in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and
  - providing a mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.
3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.
  4. Ensuring that other new land uses within identified residential areas are compatible with residential amenity.
  5. Requiring 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and 90% of new dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

#### Reason for the policy

- 4.3.19. London has a severe housing shortage caused by a growing population and an inadequate supply of housing units. The lack of suitable and affordable housing has been identified by many businesses and business groups as a key constraint to further economic development and investment. The scale of housing proposed will contribute towards meeting local and wider London housing needs whilst still ensuring that the City remains predominantly a commercial office centre of national importance. New and innovative models of providing housing, including Build to Rent and Co-living, will be encouraged to meet changing housing needs.
- 4.3.20. New housing in the City may be suitable for people that need to live near their workplace, especially key workers. Suitably located housing in the City can address local housing need and make a modest contribution to alleviating the housing shortage in London and relieving pressure on the transport system.
- 4.3.21. The London Plan includes a detailed policy which supports Build to Rent developments. Build to Rent accommodation is specifically designed for renting, is typically owned by institutional investors, offers the potential for longer term returns for investors and importantly, longer lease terms and security for tenants. The City Corporation will support Build to Rent in or near the City's residential areas and where it meets the detailed requirements in the London Plan.
- 4.3.22. The City Corporation considers that there is potential within or near the identified residential areas for Co-living accommodation and will encourage such provision on appropriate sites. Co-living accommodation will typically provide private ensuite

bedrooms, shared social spaces and co-working spaces with the latest smart technology. They are often suitable for people at early stages of their career when their ability to afford self-contained accommodation may be limited.

4.3.23. Where appropriate, the City Corporation will support the appropriate regeneration of residential estates in the City where it will deliver improved living conditions for existing tenants and provide additional housing to meet housing needs.

4.3.24. Many households in London already require accessible or adapted housing to lead dignified and independent lives. More Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving to alternative accommodation.

#### How the policy works

4.3.25. To ensure that permissions for new housing are built out in a timely fashion, developers should provide information on the expected completion date for new residential development. The City Corporation will keep this under review and expect developers to liaise with the Corporation where it becomes apparent that anticipated completion dates cannot be achieved.

4.3.26. There is a presumption in national policy and the London Plan that new affordable housing associated with housing development should be provided on-site. The City Corporation will expect developers to deliver on-site affordable housing in new housing development above the affordable housing threshold unless it can be demonstrated through robust assessments that on-site provision is not feasible or viable and that off-site provision would better deliver mixed and inclusive communities than on-site provision.

4.3.27. The City Corporation requires commercial development to make a financial contribution towards off-site affordable housing delivery instead of delivering mixed use development including housing on commercial sites. These contributions are used to deliver new affordable housing principally on City Corporation housing estates within and outside the City of London.

4.3.28. Land within the City is an expensive and limited resource and there is a policy priority to deliver new office floorspace to strengthen its strategically important business role. The City Corporation therefore also works with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs, principally on City Corporation-owned housing estates, utilising commuted sums from commercial and housing developments within the City. This approach has been supported by the GLA and has provided affordable housing in locations in or near the City that meet local housing need, whilst making the best use of scarce City land for strategically important commercial activity. Although some affordable housing provision outside the City will continue to be funded by contributions from commercial development in the City, the presumption in this Plan is that new housing development in the City should provide affordable housing on-site.

#### 4.3.29. The London Plan and the Mayor's Affordable Housing and Viability

Supplementary Planning Guidance set a strategic target for 50% of all new homes across London to be affordable, with a minimum threshold of 35% affordable housing on all developments comprising more than 10 units or which have a combined floorspace greater than 1,000m<sup>2</sup>. The Mayor has adopted a threshold approach to the consideration of applications for housing. Schemes which meet or exceed 35% affordable housing, or 50% on public sector land, are not required to submit viability information. Where an application does not meet these requirements, a viability assessment is required and the development will be subject to viability review as development progresses.

4.3.30. In light of the Mayor's approach and the shortage of available affordable housing to meet the needs of London's workforce, a minimum of 35% affordable housing will be required on residential schemes in the City, with an ambition to deliver higher levels of affordable housing where this is viable. On public sector owned land, the higher 50% target set out in the London Plan will be applied. The presumption is that affordable housing provision should be made on-site and all sites will be expected to deliver at least the minimum required level of affordable housing. Off-site provision or cash in lieu contributions will only be accepted in exceptional cases. In exceptional cases where off-site provision or cash in lieu contributions are considered to be acceptable in principle, the off-site provision, or the financial contribution, will be set at a level which captures the full uplift in value when delivering 100% market housing. This will ensure that the development is not more viable when the affordable housing obligation is satisfied through off-site provision or a cash in lieu payment in comparison to on-site delivery. The level of off-site provision, or the amount of the cash in lieu payment, must be sufficient to deliver at least the same number, size and type of affordable homes that would be required on-site. Further guidance on affordable housing requirements, including the methodology for calculating the level of cash-in lieu or off-site contributions required will be set out in the City Corporation's Planning Obligations SPD. This SPD will be kept under review and amended as required to ensure financial contributions keep pace with the cost of delivering affordable housing and will continue to be sufficient to meet the full affordable housing requirements set out in this Plan.

4.3.31. Developments which propose lower levels of affordable housing, or where a developer considers particular circumstances exist that make a policy compliant scheme unviable, will need to be supported by robust viability assessments. These assessments will be published alongside other publicly accessible planning application information on the City Corporation's website. The City Corporation will commission an independent review of submitted assessments, with the cost being met by the applicant. Consideration of viability and overall levels of affordable housing should take place at pre-application stage to avoid unnecessary delays in the determination of submitted planning applications.

4.3.32. The requirement for on-site affordable housing in this Plan must be reflected in the price paid for land for residential development in the City. Overpaying for a site will not be regarded as an appropriate justification for failing to meet the affordable housing target.

4.3.33. Where a viability assessment demonstrates that the Plan's affordable housing targets cannot be met, the City Corporation will require an upwards only review mechanism to be included within any s106 planning obligation to ensure that any increases in scheme value or reduction in cost are appropriately reflected in increased affordable housing contributions. The detailed wording and timing of these review mechanisms will be determined on a case by case basis, having regard to the City Corporation's Supplementary Planning Document and Supplementary Planning Guidance prepared by the Mayor in support of the London Plan.

4.3.34. Various types of affordable housing are included within the national definition of affordable housing. The London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need. The City's SHMA found that the need for intermediate housing products was relatively low and that social rented units would most successfully address the City's affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site by site basis, having regard to evidence of need in the City and London Plan requirements. Developers should liaise with the City Corporation's Department of Community and Children's Services to determine an appropriate mix for proposed schemes.

4.3.35. The term 'intermediate' housing covers a range of different housing types, including shared ownership products, other low-cost homes for sale and intermediate rent. The City Corporation will take a flexible approach towards intermediate housing, based on the circumstances of each site, and will encourage provision that meets the needs of essential local workers where possible.

### **Policy HS1: Location of New Housing**

1. New housing will be encouraged on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential, commercial and other uses will be permitted.
2. New housing must not:
  - prejudice the primary business function of the City, or result in the loss of viable office accommodation, contrary to Policy OF2;
  - inhibit the development potential or business activity in neighbouring commercial buildings and sites; or
  - result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.
3. Where existing residential estates are being redeveloped, an increased number of residential units will be expected and the existing affordable housing on-site must be re-provided with at least the equivalent floorspace and tenure of affordable housing. Affordable housing which is re-provided must be offered to existing tenants at rents and service charges equivalent to those in the properties being replaced.

## Reason for the policy

4.3.36. The City is a busy and sometimes noisy place, with a high density of development and business activity at all times-during the day and evening, 7 days a week which has the potential to cause disturbance to residents. Large parts of the City are unsuitable for new housing because it could have an adverse impact on the City's primary business role and would be likely to have poor residential amenity. The London Plan indicates that residential development is inappropriate in identified parts of the City to ensure that the current and future potential to assemble sites and deliver office development is not compromised by residential development. Elsewhere in the City, offices and other strategic functions of the Central Activities Zone should be given greater weight in planning terms than residential development, except in wholly residential streets or predominantly residential neighbourhoods.

4.3.37. The City's policy approach is therefore to encourage new housing to be located within or near the identified residential areas shown in Figure 7, where reasonable residential amenity consistent with a central London location can be achieved. This approach helps to minimise disturbance to residents within the areas, while reducing potential conflict with the development and operation of commercial uses.



Figure 7: Residential Areas

4.3.38. Due to the size and unique character of the City, all new housing has previously come forward on 'windfall' brownfield sites through the redevelopment or conversion of existing buildings as opportunities arise. This pattern of housing delivery is projected to continue throughout the life of this new Plan, delivering sufficient new housing over the Plan period to meet London Plan targets. There is no need to allocate sites in the Local Plan to meet housing targets.

#### How the policy works

4.3.39. To accord with office floorspace policy OF2, applicants proposing redevelopment involving the loss or change of use of existing office accommodation must provide robust evidence to demonstrate that the site is not suitable and viable for longer term office use and the proposal will not prejudice the primary business function of the City. However, the City Corporation will take a more flexible approach to the loss of office floorspace in appropriate circumstances, where development within or near the residential areas will provide additional housing. This could be particularly appropriate where the proposed housing offers Build to Rent or Co-Living accommodation suitable for workers at an early stage of their careers. Further details are set out in the Office Use SPD.

4.3.40. Residential development will not normally be permitted along streets which have high levels of noise and air pollution unless robust evidence is submitted which demonstrates how the development will mitigate the impact of that noise and pollution.

4.3.41. Regeneration of housing estates will often involve the redevelopment of existing homes. Regeneration schemes should deliver an increased number of dwellings, where this is compatible with the delivery of a high-quality living environment for existing tenants. Existing affordable housing must be replaced at an equivalent tenure and offered to existing tenants at rents and service charges levels equivalent to those in the properties being replaced. This will help protect established local communities.

#### **Policy HS2: Loss of housing**

The net loss of existing housing units, including the amalgamation of residential units, will not be permitted except where:

- they provide poor amenity to residents which cannot be improved; or
- they do not have a separate entrance; or
- exceptionally, they are located outside identified residential areas and their loss would enable beneficial development for the business City.

#### Reason for the policy

4.3.42. The net loss of existing housing units will be resisted because of the limited opportunities to replace it in the City. This policy will also be applied to proposals for the amalgamation of adjoining residential units unless the existing accommodation is of such poor quality that it cannot provide a reasonable standard

of amenity, or the proposed unit would meet a clearly identified need for larger family accommodation. Exceptionally the net loss of existing housing may be acceptable outside residential areas where the development of offices will have a significant beneficial impact for the City. Isolated residential units outside identified residential areas can suffer poor amenity, such as noise nuisance and other disturbance due to non-residential uses in close proximity, including clubs and pubs, and can be adversely affected by the operation of the business City.

### **Policy HS3: Residential environment**

The amenity of existing residents will be protected by resisting uses which would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements.

1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity.
2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
3. All residential development proposals must accord with the 'Agent of Change' principle, demonstrating how potential adverse noise impacts on and between dwellings will be mitigated by layout, design and materials. This principle is applicable when new housing proposals might otherwise constrain existing uses.
4. The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.

#### Reason for the policy

4.3.43. The City is predominately a centre of business, with activity taking place at all times during the day and evenings, 7 days a week. This sometimes results in noise and disturbance to residents from new commercial development and commercial activities nearby. While the City Corporation will endeavour to minimise noise and other disturbance to residents it is inevitable that living in such a densely built-up area will result in some disturbance from a variety of sources, particularly outside the identified residential areas.

4.3.44. The need to minimise overlooking and overshadowing of residential accommodation is a consideration in the design and layout of both new residential buildings and other development. However due to the density of development in the City it may not always be possible to entirely avoid any impacts on amenity.

#### How the policy works

4.3.45. The 'Agent of Change' principle makes developers responsible for addressing at the design stage the environmental and other impacts of development on existing

neighbouring occupiers. Applicants for development near to existing residential properties should identify potential impacts on residential amenity and set out measures to mitigate those impacts within their Design and Access Statements or other supporting application documents. Where required, planning conditions will be imposed to limit hours of operation and servicing within predominantly residential areas. Policy CV4 addresses evening and night-time economy uses, while Policy HL3 seeks to minimise noise and light pollution.

4.3.46. New residential development will also be subject to the Agent of Change principle and should include sufficient mitigation to ensure that the amenity of prospective owners or tenants is not compromised by existing uses in the vicinity.

#### **Policy HS4: Housing quality standards**

All new housing must be of a high-quality design and of a standard that facilitates the health and well-being of occupants and neighbouring occupants, and:

- meets London Plan housing space standards;
- meets standards for Secured by Design or similar certification;
- maximises opportunities for providing communal open and leisure space for residents; and
- provides amenity space for individual units, where possible including outdoor space.

#### Reason for the policy

4.3.47. All new housing, including changes of use to housing from other uses, will be expected to provide well designed, high quality living environments, both internally and externally, incorporating principles of inclusive, secure and sustainable design.

#### How the policy works

4.3.48. Housing development should comply with the requirements in the London Plan and the Mayor's London Housing Design Guide, unless it would not be feasible to do so because of site specific factors. The layout should incorporate sufficient space and facilities for waste, recycling bins and disabled and cycle parking.

4.3.49. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy HL8. There should be no distinction between amenity spaces and play areas for private and affordable housing residents. Proposals which seek to restrict access to such areas by affordable housing tenants will be refused. Daylight and sunlight to dwellings is addressed in the Design section of the Plan.

## **Policy HS5: Short term residential letting**

1. Short term letting of permanent residential premises for over 90 days in a calendar year will not normally be permitted as it would reduce the stock of permanent housing in the City and may adversely impact the amenity of existing residents.
2. Short term letting to provide residential accommodation for commercial purposes will not be permitted unless the units are contained within a separate building and will not be permitted if mixed with permanent residential accommodation.
3. Where short term residential letting is permitted for commercial purposes, conditions will be imposed to prevent any later changes to permanent residential use in unsuitable accommodation or locations.

### Reason for the policy

4.3.50. The City of London is primarily a commercial office centre. There is a small stock of permanent residential properties and this stock needs to be maintained and increased to ensure that the City can continue to meet its assessed housing need. Loss of residential accommodation to short-term letting would reduce the overall stock of permanent housing and the City's ability to meet its housing need. At the same time, there is some demand for residential accommodation that can be let on a short-term basis to provide for the needs of the City's business community, particularly for visiting workers. Such short-term accommodation has a role to play but should not be mixed with permanent residential accommodation.

### How the policy works

4.3.51. Under the Deregulation Act 2015, short term letting for less than 90 days in a calendar year of domestic premises liable for council tax does not require planning permission. Letting for periods of more than 90 days in a calendar year would require permission.

4.3.52. Short term residential lets of more than 90 days in a calendar year within domestic premises will not normally be permitted as they would reduce the stock of permanent housing in the City, possibly jeopardise housing delivery targets, and adversely impacting on the amenity of existing residents.

4.3.53. Change of use of short term residential letting accommodation to permanent dwellings will normally be permitted where housing and amenity standards are met and the location accords with Policy HS1.

4.3.54. The provision of short term lets for commercial purposes can help to meet the accommodation needs of business visitors. Such letting can have significant impacts on the amenity of neighbours by reason of noise, disturbance, and occasionally anti-social behaviour. Where such accommodation is proposed, the units should be contained in a separate block that is designed and managed for this purpose rather than forming part of a mixed block of short term and permanent residential units or short term residential lets and commercial activities.

4.3.55. The requirement for the provision of affordable housing in Policy S3 applies to the commercial provision of self-contained short let residential accommodation.

### **Policy HS6: Student housing and hostels**

1. Proposals for new student accommodation and hostels should support the City of London's primary business function and will only be permitted where they do not:
  - prejudice the primary business function of the City, or result in the loss of suitably located and viable office floorspace, contrary to Policy OF2;
  - have an adverse impact on the residential amenity of the area; and
  - involve the loss of permanent residential accommodation.
2. Proposals for Purpose-Built Student Accommodation (PBSA) should be supported by identified further or higher educational institutions operating in the City of London or the Central Activities Zone.
3. 35% of student housing on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
4. The loss of existing student housing and hostels to other suitable uses which are in accordance with Local Plan policies will be permitted where there is no longer a need to provide accommodation for CAZ based universities or there is evidence that student accommodation is impacting on residential or business amenity.

#### Reason for the policy

4.3.56. The demand for student accommodation in London continues to grow. Higher education provision is a key part of London's attractiveness as a World City and supports the City of London's commercial role. However, opportunities for residential development in the City are limited and student housing may represent an opportunity lost to meet other housing needs in residential areas.

#### How the policy works

4.3.57. New Purpose-Built Student Accommodation (PBSA) should be supported by an identified further or higher educational institution for the housing of its own students. To reduce the need to travel between student accommodation and educational institutions, PBSA providers should seek support from institutions within the City or the Central Activities Zone through nomination agreements in line with London Plan requirements. Nomination agreements, secured by s106 agreements, will be required for all affordable student accommodation.

4.3.58. The Housing Delivery Test establishes a national ratio that every 2.5 student bedrooms in PBSA meet the same housing need as one conventional housing unit and contribute to meeting the City's housing target at this ratio.

4.3.59. National space and accessibility standards do not apply to student accommodation, but other Plan policies require inclusive and high quality design, which will assist in ensuring the needs of students with disabilities are accommodated.

4.3.60. New student accommodation must not impact adversely on the amenity of existing residents or occupiers, either individually or cumulatively with other student accommodation developments. The Agent of Change principle will apply to new student accommodation.

4.3.61. Hostels can contribute to providing accommodation for vulnerable homeless people. The City Corporation's Homelessness Strategy outlines how the Corporation will seek to reduce the incidence of rough sleeping in the City through collaborative working with outreach services, health services, the City of London Police, businesses and others. The Strategy seeks to provide appropriate accommodation options for homeless people, including through the use of s106 contributions to deliver new affordable housing or hostels. Hostels may be acceptable within or near identified residential areas, where the amenity of existing occupiers is protected.

### **Policy HS7: The Temples**

Within the Temples adjustments between professional and residential accommodation will be permitted where:

- the overall balance of residential and professional chambers is maintained;
- it is important to the functioning or character of the Temples, or to the continuing use of their buildings.

#### Reason for the policy

4.3.62. The Inner and Middle Temples are two of the Inns of Court which provide accommodation for the legal profession in the south west of the City between Fleet Street and the River Thames. Along with other nearby Inns of Court and the Royal Courts of Justice in Westminster, the Temples form part of a specialist legal cluster recognised in the London Plan.

4.3.63. The Temples mainly contain barristers' chambers, together with other accommodation for Members of the Bar. The Inner and Middle Temples have a strong collegiate atmosphere due to the mix of residential and commercial uses. This mix of uses contributes to the historic interest and high environmental quality of the area and should be maintained.

#### How the policy works

4.3.64. In determining applications, the City Corporation will have regard to the importance of the continued existence of residential, office and support uses in the Temples and the contribution that this makes to their special character. However, the need to rationalise and refurbish chambers in order to maintain an efficient business and professional community is recognised.

## **Policy HS8: Older persons housing**

The City Corporation will aim to ensure there is a sufficient supply of appropriate housing available for older people by:

- making provision for a minimum of 170 net additional dwellings for older persons between 2019/20 and 2035/36;
- supporting development that meets the specific needs of older people;
- supporting development that replaces existing provision for older people with better provision that addresses care needs or fosters independent living;
- ensuring new development is inclusive and accessible to all to allow people to continue living in their own homes; and
- resisting development that involves the net loss of housing for older people.

### Reason for the policy

4.3.65. The City of London has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. The City of London SHMA identifies a need for 67 specialist older person units over the life of the Plan, and the London Plan has an indicative figure of 10 units per year.

### How the policy works

4.3.66. The City Corporation will work with developers to encourage the provision of sufficient accommodation suitable for older people, including provision of specialist older persons accommodation, where feasible, to meet identified needs. Housing suitable for older persons, including sheltered housing, is provided by the City Corporation on its land and estates, inside and outside of the City. Provision outside the City may assist in meeting the need for older persons housing for City residents through nomination rights. Specialist older persons housing should deliver affordable housing in line with Policy S3. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. This issue is addressed in Policy VT3.

## **Policy HS9: Self and custom housebuilding**

The City Corporation will encourage the provision of self and custom build units within large residential schemes.

### Reason for the policy

4.3.67. The Self Build and Custom Housing Building Act 2015 requires councils to create a public register of individuals and groups who are interested in acquiring a plot to use for a self-build or custom build home. The City Corporation launched its own register for prospective self-builders in 2016.

## How the policy works

4.3.68. There are no large areas of unused land in the City of London that would provide an opportunity to create serviced building plots. Furthermore, self-build and custom-build are likely to involve lower density development, which would conflict with policies in the Plan which seek to maximise housing supply. Given these constraints, the City Corporation considers that the best prospect for bringing forward suitable land will be in conjunction with large housing developments where units can be built to shell and core and individually fitted out.

# 5. Support a Thriving Economy

## 5.1. Offices

### Context

- 5.1.1. The City is London's historic business core and today represents the largest concentration of office-based employment in the capital. It forms a world leading international financial and professional services centre, renowned for its financial, insurance and legal sectors which are the main office occupiers. The City is seeing a rapid increase in serviced offices and co-working providers, which offer more flexible workspace options and attract a more diverse range of occupiers including technology, creative enterprise and media companies.
- 5.1.2. The whole of the City forms the business cluster and is suitable for commercial development. There are, however, residential areas within the City where a mixture of residential and commercial uses will be permitted (see Policy S3).
- 5.1.3. There were 23,580 businesses and 522,000 workers in the City in 2018 and employment is projected to continue to grow over the long term. Over 98% of all the City businesses are Small and Medium Enterprises (SMEs) with fewer than 250 employees; 80% have fewer than 10 employees.
- 5.1.4. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business.
- 5.1.5. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. Prior to the Covid-19 pandemic, the GLA project that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will also create demand for more employment and for the space required to accommodate it.
- 5.1.6. The Covid-19 pandemic is having significant health, wellbeing, social and economic impacts globally. The City of London has not been immune to these impacts and has seen a significant shift in working patterns to flexible and remote working, with major reductions in City footfall and use of the City's retail, leisure and cultural assets. Flexible working patterns are likely to continue in some form for most businesses and employees post Covid, within a blended approach to office working. The likely reduction in office occupation densities due to Covid presents an opportunity for City offices and businesses to reinvent themselves and the way that they work. Economic modelling by the GLA suggests a gradual return of economic activity and a return to economic and employment growth. At the same time, the fundamentals underpinning the City's success, its locational advantages and the benefits of collaboration and co-operation remain. Alongside continued investor and developer interest in the City as a place in which to do business, these

fundamentals suggest that the City will continue to prosper and, over the life of this Plan, will see further employment growth and a need for additional office, creative and collaboration space.

5.1.7. The United Kingdom's exit from the European Union will also have short and long-term effects on economic and employment growth depending on the detail of future trading arrangements.

5.1.8. The City Corporation will continually review employment and office growth trends and the economic impacts of the Covid-19 pandemic and the UK's departure from the European Union and will bring forward a review of this Plan to address changing trends, where necessary.

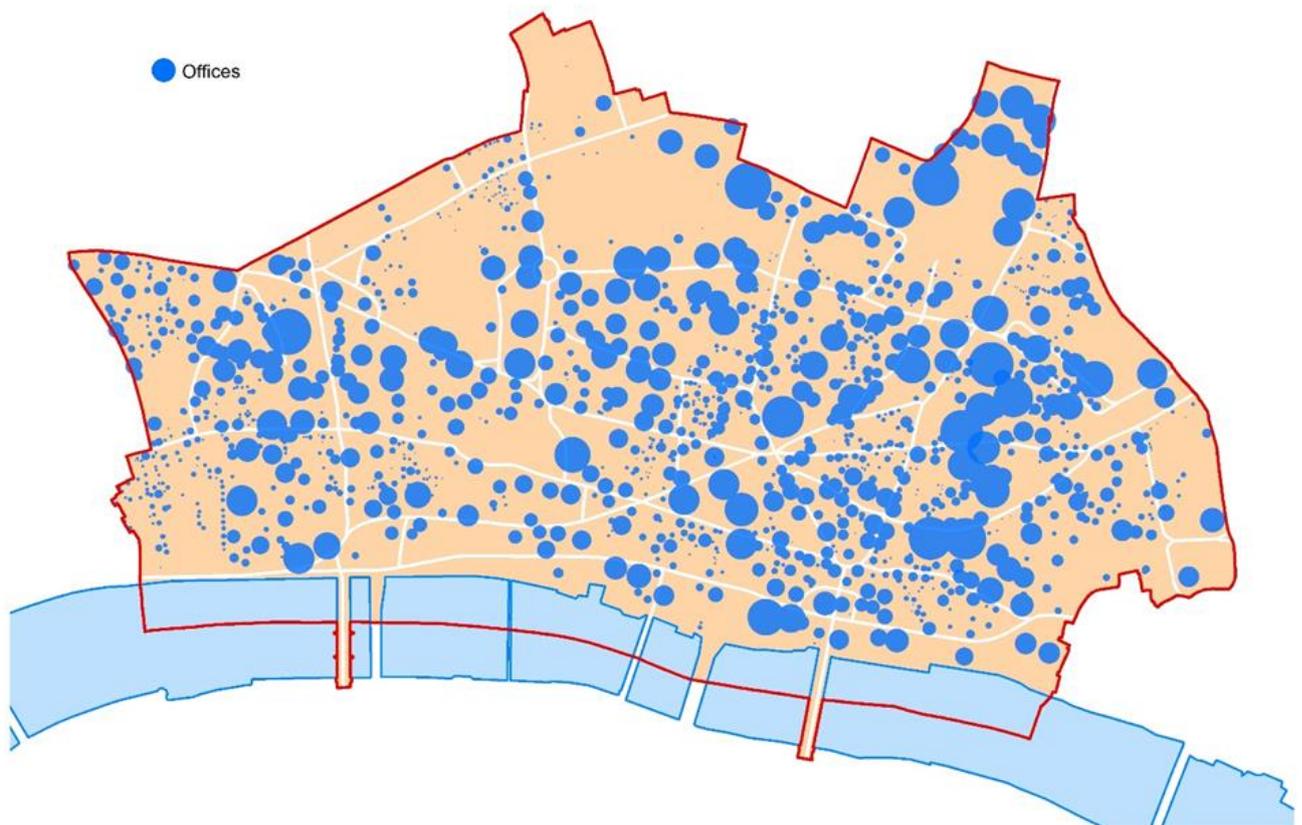


Figure 8: Office distribution

## Strategic Policy S4: Offices

The City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by:

1. Increasing the City's office floorspace stock by a minimum of 2,000,000m<sup>2</sup> net during the period 2016 to 2036, phased as follows:
  - 2016 – 2021      750,000m<sup>2</sup>
  - 2021 – 2026      750,000m<sup>2</sup>
  - 2026 – 2031      250,000m<sup>2</sup>
  - 2031 – 2036      250,000m<sup>2</sup>
2. Ensuring that new floorspace is designed to be flexible to allow the transformation and adaptation of space to support new uses and different types and sizes of occupiers and to meet the needs of SMEs, innovative and start-up companies and those requiring move-on accommodation.
3. Where appropriate, encouraging the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City.
4. Protecting existing office stock from being lost to other uses where there is an identified need or where the loss would cause harm to the primary business function of the City. Where necessary, conditions may be attached to permissions for new office floorspace to secure its long-term use for such purposes.

### Reason for the policy

- 5.1.9. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The overall office floorspace target of 2,000,000m<sup>2</sup> is derived from the estimated growth in office employment between 2016 and 2036 and represents a 23% increase in floorspace.
- 5.1.10. Notwithstanding the short term impacts of the Covid-19 pandemic on occupier demand and construction activity, the City has a robust development pipeline. In March 2020, approximately two-thirds of the total office floorspace target had either been completed since the baseline date of 2016 or was under construction. While the long term impacts of the pandemic on the office market are uncertain, flexible working has become a key part of the business environment and it seems likely that many City workers will choose to spend at least part of the week working remotely rather than from the office. However, this trend is expected to be counteracted by a shift towards lower occupation densities and the provision of more breakout space within offices. The overall impact on floorspace demand may therefore be broadly neutral.

- 5.1.11. In 2016, 25% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 28% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. In 2018, there were approximately 41,000 persons in the City employed in Creative Industries. This broader range of occupiers is creating requirements for a broader range of office types.
- 5.1.12. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspace within the City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.
- 5.1.13. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. At present there is no evidence that a specific policy requirement for subsidised workspace is needed in the City, but developers are encouraged to consider a range of leasing structures, including below market rents, where appropriate. The City Corporation is working closely with neighbouring boroughs to ensure that affordable workspace and move-on accommodation needs can be accommodated, in particular providing signposting and assistance to businesses in finding suitable office accommodation.

#### How the policy works

- 5.1.14. Strategic Policy S4 indicates the amount of floorspace required to meet the forecast employment growth and will encourage the flexible floorspace needed to attract and retain a range of occupiers.
- 5.1.15. The delivery of floorspace in the City will be phased across the plan period, with indicative phasing targets identified in the Policy. Phasing allows for short term monitoring of progress in meeting floorspace targets and effective planning for supporting services and infrastructure. A significant amount of office floorspace is under construction in the City, much of which will be completed in the first 2 phasing periods. It is expected that 75% of the floorspace target will be achieved by 2026, with the remaining 25% in the latter phases.
- 5.1.16. The City Corporation has made an Article 4 Direction removing permitted development rights for the change of use of offices (B1a) to dwelling houses (C3) across the whole of the City. The Direction is consistent with the approach to office development and protection of offices set out in this Plan.
- 5.1.17. Changes to the Use Classes Order introduced in September 2020 mean that offices could be converted to a range of other Class E commercial, business and service uses without planning permission. Given that the largest past losses of office accommodation in the City have been to residential or visitor accommodation

uses, this change is not expected to pose a significant risk to the City's strategic role as a centre for financial and professional services. However, where permission is granted for office schemes that meet a specific identified need, conditions may be attached to ensure the impacts of any proposed later conversion of such space can be considered through the planning application process.

## **Policy OF1: Office Development**

1. Office development should:

- be of an outstanding design and an exemplar of sustainability; and
- be designed for future flexibility to future proof the City's office stock; and
- provide office floorspace suitable for a range of occupiers; and
- where appropriate, provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises.

2. Other commercial uses will be encouraged as part of office-led development, particularly at ground and basement levels, where such uses would not compromise the operation of office premises, would activate streets and provide supporting services for businesses, workers and residents.

### Reason for the policy

5.1.18. A range of office floorspace is required to accommodate the future needs of the City's office occupiers and this should include provision for incubator, co-working and accelerator space, as well as provision for larger firms where required. Flexible office floorspace is required that can be easily adapted to meet changing workplace and technology requirements and the needs of a variety of office occupiers.

5.1.19. Offices are the predominant land use in the City, but complementary uses are required to provide supporting activities and services for businesses, workers and residents in appropriate locations within the City. Complementary uses which contribute to the City's economy include retail, leisure, education, health facilities and cultural uses. A mix of commercial land uses, in particular at ground floor and basement levels, may create active frontages enhancing an area's vitality and provide important complementary services. They also provide opportunities for creativity, collaboration and social interaction, which are key to the success of the City's business clusters.

### How the policy works

5.1.20. Proposals for new office development should demonstrate design quality and flexibility to accommodate a range of businesses. Particular encouragement will be given to floorspace which meets the needs of small businesses, start-ups and incubator space. Office development should include a suitable mix of complementary commercial or other uses appropriate to the site and location and contribute to the creation of active frontages at street level.

## **Policy OF2: Protection of Existing Office Floorspace**

1. The loss of existing office floorspace will be resisted unless it can be demonstrated that:
  - there is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months; and
  - refurbishment or re-provision of some or all of the office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; or
  - the loss of office floorspace is limited to ground or below ground levels and proposed new uses would be complementary to continued office use on upper floors; or
  - the loss of office floorspace is within or near identified residential areas and would result in the provision of additional housing, particularly Build to Rent or Co-living accommodation.
2. Where the above criteria have been met, the loss of office floorspace may be permitted provided that:
  - the proposed development would not compromise the potential for office development on sites within the vicinity and would have demonstrable wider benefits for other objectives of this Plan; and
  - the potential for re-providing a reduced amount of office floorspace within the development has been considered.

### Reason for the policy

- 5.1.21. The City is the world's leading international financial and professional services centre and is recognised as having a key role in the UK economy. To maintain this position and accommodate the projected increase in employment and office floorspace, it is important to maintain existing office stock whilst accommodating future demand through the provision of flexible floorspace which is suitable for a range of occupiers.
- 5.1.22. The protection of existing offices is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. Proposals involving the loss of office accommodation that require planning permission will need to be supported by robust evidence of marketing and viability to ensure that viable offices can be retained to meet future office need. Following changes to the Use Classes Order introduced in September 2020, existing offices could be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this.
- 5.1.23. Refurbishment of office floorspace will be encouraged to accommodate future needs, whilst aligning with the sustainability principles set out in Policy DE1 and the

need to find suitable and sustainable uses for historic buildings. Historic buildings can provide affordable office stock though they have specific constraints and opportunities which may affect the viability of refurbishment.

#### How the policy works

- 5.1.24. This policy will be applied on a sequential basis. Firstly, proposals need to demonstrate that there is no realistic demand for the existing office accommodation, or for refurbished or new office accommodation on the site, by complying with the criteria set out in Part 1 of the policy.
- 5.1.25. The loss of office floorspace on the upper levels of buildings will require robust evidence to demonstrate why continued office use is not possible. This includes robust evidence of marketing of the building or site for continued office use over a period of at least 12 months. The City Corporation will need to be satisfied that the site/building has been offered at a realistic price commensurate with the value of the site/building for office use and that active promotion has been undertaken by the agents marketing the site over the period. Proposals must provide evidence that the continued office use of the site would be unviable in the longer term.
- 5.1.26. Viability assessments submitted in accordance with this policy will be made public, other than in exceptional circumstances, as set out in Policy PC1. Viability assessments should include the following:
- Site description;
  - A valuation of the building in its existing use unfettered by any hope value;
  - Total costs of maintaining the building as existing and in the future;
  - Costs of refurbishing or redeveloping the building for office use;
  - Information on rents and capital values;
  - Information on current and recent occupation;
  - Target rates of return (internal rate of return or other appropriate measure); and
  - Sensitivity testing to support the robustness of the report conclusions.
- 5.1.27. The change of use of office floorspace at ground and lower ground levels may improve the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces and will be exempted from the requirement to provide viability and marketing evidence where it does not prejudice the use of the building or site for office purposes
- 5.1.28. Within or near identified residential areas, the City Corporation may, in appropriate circumstances, take a more flexible approach to the conversion of office floorspace to residential use, particularly where the residential accommodation is of a type such as Build to Rent or Co-Living which may be more complementary to the business City. In such cases, there would be no requirement to provide marketing and viability evidence under Part 1 of the policy.

5.1.29. Further guidance on the evidence required to support the loss of office floorspace is set out in the Office Use SPD. Proposals which satisfy Part 1 of the policy will then need to comply with Part 2 of the policy by demonstrating that they are compatible with the wider objectives of the Plan and would not compromise office development on other sites in the vicinity.

5.1.30. Where a proposal results in a reduced amount of office floorspace, account will be taken of the type and size of office floorspace provided and whether there is a specific need for office floorspace of that size and type in the City.

### **Policy OF3: Temporary ‘Meanwhile’ Uses**

1. Temporary use of vacant commercial, business and service buildings or sites (‘meanwhile’ uses) will be permitted where the proposed use would not result in adverse impacts on the amenity of the surrounding area or the primary business role of the City. Where temporary permission is granted it will be for a period not exceeding 36 months and the site will revert to its prior lawful use thereafter.
2. Residential development is not considered an appropriate meanwhile use and will not be permitted.

#### Reason for the policy

5.1.31. Where buildings or sites in Class E commercial, business or service uses are vacant, and development is not expected in the short term, ‘meanwhile’ or temporary uses will be supported to ensure the vitality and vibrancy of the City is maintained, subject to the impact on surrounding uses.

#### How the policy works

5.1.32. ‘Meanwhile’ uses will be granted subject to conditions for a maximum of 36 months, after which the use will revert to its prior lawful use. Applications to extend the period of the ‘meanwhile’ use or make it permanent will be considered against the relevant policies in the Development Plan and will not be permitted unless it is demonstrated that the permanent loss of the prior lawful use is acceptable.

## 5.2. Retailing

### Context

- 5.2.1. Retailing is important for all the City's communities – but retail demand is largely driven by City workers. This has resulted in a predominantly five-day (Monday-Friday) trading week with footfall concentrated over weekday rush hours and lunch times. The City is, however, becoming a 7 day a week destination, with more retail units catering for a growing weekend and evening trade.
- 5.2.2. There is demand for a better range and quality of retail and leisure facilities. The above average spending power of the City's growing working and residential populations, longer and extended working and trading hours, the increasing number of visitors and the Square Mile's high accessibility by public transport create significant opportunities for improvement to the retail offer.
- 5.2.3. The ways in which people shop and use retail facilities are changing and the City's retail offer needs to adapt to address changing consumer and leisure habits, whilst also retaining a focus on centres as places to shop. The Covid-19 pandemic has significantly reduced footfall in town centres and retail centres nationally and hastened the growth of online retailing, having short-term impacts on the vitality and viability of many retail and leisure facilities. Retail centres that provide a diverse range of town centre uses, including shops, services, creative and leisure activities are likely to be in a better position to respond to changing retail demand and recover from the impacts of Covid-19. In the City, as elsewhere, there has been an expansion of experiential retail, leisure, entertainment and mixed uses, which can increase footfall at different times of the day and add to the visitor experience. Such uses are an important component of the City's overall retail mix.

### Strategic Policy S5: Retailing

The City Corporation will seek to improve the quantity and quality of retailing and the retail environment, promoting the development of the City's four Principal Shopping Centres (PSCs) and the linkages between them by:

1. Focusing new retail development in the PSCs and encouraging movement between them by enhancing the retail environment along Retail Links.
2. Supporting proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand up to 2036.
3. Requiring major retail developments over 2,500m<sup>2</sup> gross floorspace to be located within or near PSCs. Where suitable sites cannot be identified within PSCs, sites immediately adjoining the PSCs and in Retail Links should be considered. Other areas of the City will only be considered where no suitable sites are identified within or adjoining the PSCs and Retail Links.

4. Requiring a Retail Impact Assessment for schemes of 2,500m<sup>2</sup> gross floorspace and above outside PSCs. The cumulative impact of retail floorspace will be taken into account in the assessment of planning applications.
5. Focusing comparison and convenience shops within the PSCs, with a broader mix of retail and appropriate town centre uses on the peripheries of the centres and the Retail Links.
6. Supporting the provision of retail and other town centre uses that provide active frontages at street level across the City where they would not detract from the viability and vitality of the PSCs and the Retail Links.

#### Reason for the policy

5.2.4. Four Principal Shopping Centres (PSCs) have been identified which provide a variety of comparison and convenience shopping in the City of London: Cheapside, Moorgate/Liverpool Street, Fleet Street and Leadenhall Market. Cheapside is considered to be the City's 'high street' and has seen the most significant retail development in recent years. Moorgate/Liverpool Street PSC has potential to accommodate significant further retail floorspace, capitalising on the opening of the Elizabeth Line and becoming a key retail destination.

5.2.5. A Retail Needs Assessment undertaken in 2017 identified a need for approximately 200,000 m<sup>2</sup> of additional retail floorspace up to 2036. This is an aspirational target based principally on projected employment growth in the City. The reduction in footfall and the increase in online retailing as a result of the Covid-19 pandemic has reduced retail activity in the City, at least in the short term. The introduction of a Commercial, Business and Service use class, Class E, which replaces previous A1, A2 and A3 uses, reduces the City Corporation's ability to manage the mix of retail uses. These changes are likely to impact on the projected level of retail growth. Nevertheless, the fundamental economic indicators underpinning the Local Plan remain and the patterns of growth identified in the Retail Needs Assessment remain valid. The Assessment identifies the potential for significant retail growth in and around the PSCs, with a focus on potential growth around Moorgate/Liverpool Street. Some growth is anticipated to come forward outside the PSCs, near them or along the Retail Links.

5.2.6. The PSCs are recognised in the London Plan as 'CAZ Retail Clusters' that accommodate a range of other commercial uses alongside the retail function. Outside the PSCs, retail units are dispersed across the City though many are on streets identified as Retail Links (see Figure 9), while others form convenient local centres or are isolated units.

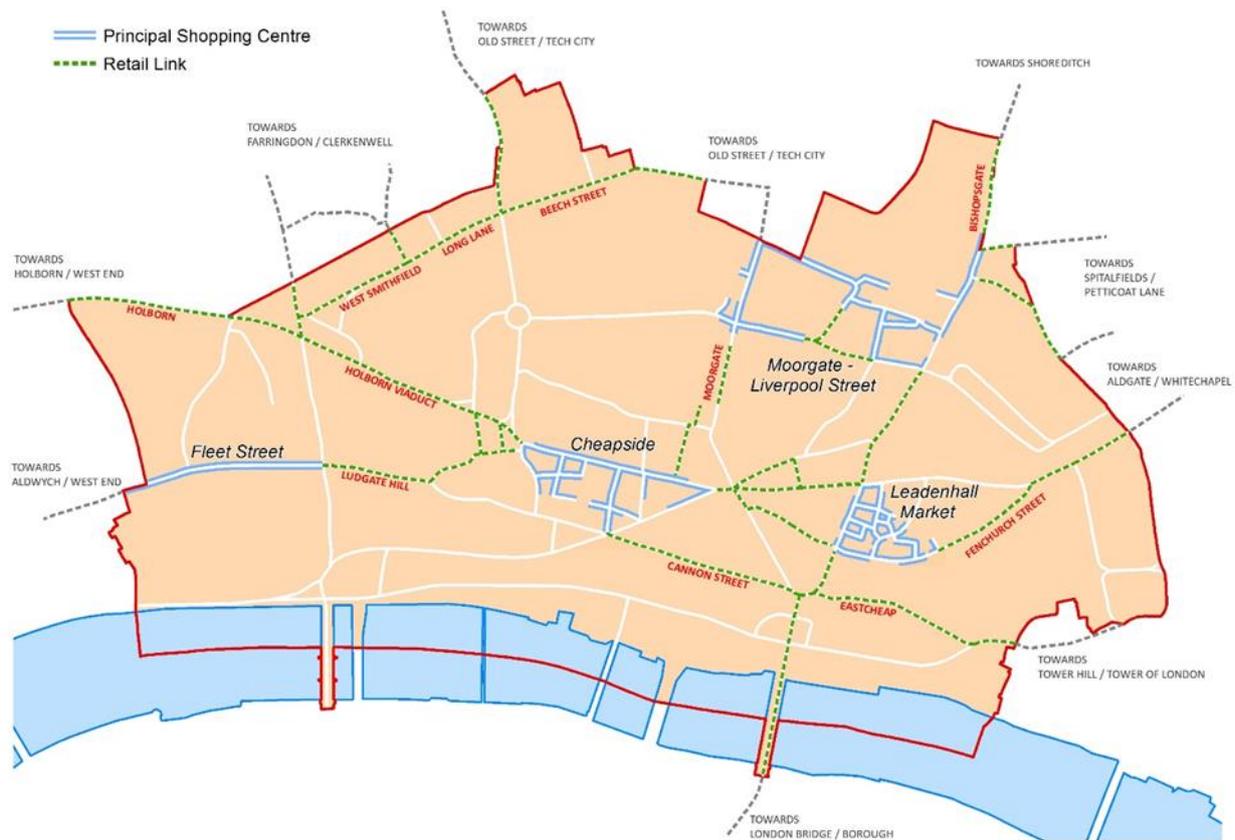


Figure 9: Principal Shopping Centres and Retail Links

### How the policy works

5.2.7. There are further opportunities to develop the City's retail offer, allowing for a broad mix of retail facilities while maintaining a predominance of comparison and convenience retail uses. The role and status of the four PSCs will be strengthened, encouraging further retail development, enhancing the retail offer in the City, supporting its primary business function and the growing cultural activity within the City. Improvements to pedestrian links and the retail offer within the Retail Links will encourage shoppers to move between the PSCs by enabling increased activity along these connecting routes, and creating a welcoming and vibrant environment.

5.2.8. Major retail development, defined as development over 2,500m<sup>2</sup> gross floorspace, should locate within PSCs, but where suitable sites are not available sites on the edge of the PSCs or on identified Retail Links should be considered before other areas of the City. Smaller scale retail development will be encouraged throughout the City, where it provides an active frontage and facilities which meet the needs of the City's working population or local residents. Particular encouragement will be given to convenience retail uses near to residential areas that serve the needs of residents.

5.2.9. Active retail frontages should be provided at street level across the City. Other appropriate town centre uses, including leisure uses, will be acceptable where they provide an active frontage. Retail uses may be permitted on upper floors of major

commercial developments, including in tall buildings, where they provide additional facilities which are accessible to the public and office occupiers.

### **Policy RE1: Principal Shopping Centres**

1. Principal Shopping Centres (PSCs) are designated frontages on the Policies Map. Sites or buildings that form part of a designated frontage are considered to be part of the PSC in their entirety.
2. The role of the PSCs as concentrations of comparison and convenience shopping will be retained. The loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages. Where planning permission is required, proposals for changes between retail uses within the PSCs will be assessed against:
  - the contribution the unit makes to the function and character of the PSC; and
  - the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage

#### Reason for the policy

- 5.2.10. The frontages of the four PSCs are defined on the Policies Map. Concentrating major new retail development in or near PSCs will ensure that their vitality and viability is maintained and will provide an opportunity to focus retail facilities in the most appropriate areas of the City, enhancing these as shopping destinations for City residents, workers and visitors. In accordance with the definition of PSCs set out in this policy, a sequential or retail impact assessment will not be required for retail development on any site or building that contains a designated frontage.
- 5.2.11. Retail uses within the PSCs are predominantly comparison and convenience uses and the City Corporation considers that this predominance should continue, supported by other town centre uses that provide activity at street level and create a welcoming and attractive environment for people to shop, access services and spend leisure time.
- 5.2.12. Following changes to the Use Classes Order introduced in September 2020, existing shops, premises providing financial and professional services to the public, and restaurants and cafes could be converted to a range of other Class E commercial, business and service uses without planning permission, unless there are specific planning conditions attached to a site which prevent this. Where planning permission is required for changes between retail uses, the City Corporation will require the provision of active retail frontages onto the street and will also assess the contribution the unit makes to the character of the PSC as a whole and its frontage; for example, retail units that are large or in prominent locations should be retained in retail use. The net loss of ground floor retail uses to non-retail uses within the identified PSC frontages could compromise the vitality of the PSCs and will be resisted.

## How the policy works

5.2.13. Proposals for additional retail development in the PSCs should incorporate a range of unit sizes and frontage lengths to help provide a more diverse retail offer, whilst retaining a predominance of comparison and convenience shopping uses. Retail uses can generate significant numbers of delivery trips and retail development proposals will be required to demonstrate how delivery and servicing requirements have been addressed in the design process.

5.2.14. Each PSC in the City has an individual character, which is described below, and will be considered in the implementation of policy:

### **Cheapside**

5.2.15. Cheapside is currently the largest PSC in the City and serves a wider catchment area than the other centres. The PSC includes Bow Lane, the ground floor of One New Change, Cheapside and Poultry. The PSC has undergone significant redevelopment since 2011 and the strategy is to reinforce its role and character as the City's 'High Street', maintaining a clear predominance of retail units with a focus on comparison goods and food and drinks provision. There is scope for greater weekend trading and for some additional retail floorspace, particularly to link the western part of Cheapside with Culture Mile. The City Corporation will work with the Cheapside Business Alliance to promote Cheapside as a shopping, business and visitor destination and to support its evolution into a seven day a week destination. Timed restrictions on vehicular access to Bank Junction and the potential for future public realm improvements provide an opportunity to achieve greater pedestrian movement and retail links between Cheapside and retail activity within the Royal Exchange and further east.

### **Fleet Street**

5.2.16. Fleet Street is the smallest PSC and predominantly serves the needs of nearby workers and residents with a limited number of premises open in the evenings or at weekends. The PSC has a linear form and the busy road creates a poor environment and acts as a barrier to pedestrian permeability. Improvements to the public realm would help to improve the environment and the visitor and shopper experience. The current retail stock is largely food retail, and there is an opportunity to capitalise on the comparatively lower rents. Fleet Street's outstanding heritage offers opportunities to develop a more distinctive retail mix in this PSC. There is some capacity for additional retail provision between Fleet Street and Holborn and there is scope to strengthen retail links with Cheapside.

### **Leadenhall Market**

5.2.17. Leadenhall Market PSC is centred on the iconic Victorian market building, but includes several surrounding streets. The PSC is located within the southern part of the City Cluster which accommodates a significant and growing proportion of the City's workforce. The historic Grade II\* listed market building is a tourist destination and so evening and week-end trading is encouraged. The character and significance of the historic market will be maintained and enhanced as a visitor and retail destination, supporting a flexible range of retail uses with an emphasis on

food and beverage. Increased demand arising from the expanding City Cluster workforce will be met through larger, modern units in the surrounding streets which act as gateways to the market. Additional retail will be provided by active retail frontages to new office development in the area.

### **Moorgate/Liverpool Street**

5.2.18. Moorgate/Liverpool Street PSC is the second largest in the City but has a relative under-provision of comparison goods space compared to the City average. Retail demand in this PSC will increase due to the improved connectivity arising from the Elizabeth Line and development in and around Broadgate, supported by further retail provision along routes between Liverpool Street and Moorgate stations. There is potential for the PSC to expand its 7-day a week role, capitalising on its strong transport accessibility, its proximity for inner London residents and to nearby visitor and cultural attractions such as the Culture Mile, Old Spitalfields Market and Petticoat Lane.

### **Policy RE2: Retail Links**

Within the Retail Links, the net loss of active-frontages and floorspace will be resisted, including the loss of retail facilities, and additional retail development will be supported. A mix of retail and town centre uses will be encouraged in the Retail Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

#### Reason for the policy

5.2.19. Retail Links provide City workers and residents with important services and leisure facilities and are typically along some of the busiest pedestrian routes. Their purpose is to connect the City's PSCs and to provide connections to neighbouring boroughs' retail frontages, transport hubs, areas with high footfall and residential areas. Retail Links are a key part of the 40% of the City's existing retail stock found outside of the PSCs and they play a significant role in meeting demand particularly for day-to-day retail goods and services.

#### How the policy works

5.2.20. The Retail Needs Assessment identified the need for approximately 85,000m<sup>2</sup> of additional retail floorspace in the 'rest of the City' outside the PSCs. The Assessment highlighted two areas that should be a priority for new floorspace outside the PSCs: Farringdon/Culture Mile and Eastcheap/Monument. Delivery of new retail floorspace at Eastcheap/Monument could help to meet some of the demand arising from office development in the City Cluster which cannot be accommodated within the Leadenhall Market PSC and would provide more vibrant links towards the Pool of London.

5.2.21. While the Retail Needs Assessment concluded that the Retail Links continue to play an important role in meeting demand, it advocated a different occupier mix in these areas compared to the PSCs in order to avoid drawing visitors away from the prime PSC streets. Comparison goods shopping should continue to be focused in the PSCs to maintain the health of the City's core retail offer.

5.2.22. While the mix of uses in the Links should include comparison and convenience shops, a variety of other retail and town centre uses will be permitted, where there is no detrimental or cumulative effect on the amenity of neighbouring residential or business premises, such as through litter, noise, disturbance and odours. All development in the Retail Links should incorporate active frontages at street level.

### **Policy RE3: Ground floor retail provision elsewhere in the City**

1. Retail uses will be encouraged at ground floor level across the City provided they:

- include active frontages onto the street;
- do not impact adversely on the amenity of residents, workers and visitors;
- do not impact adversely on the operation of office premises; and
- would not adversely affect the vitality and viability of the PSCs or Retail Links.

2. The loss of convenience retail units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.

#### Reason for the policy

5.2.23. Retail units outside of PSCs and Retail Links provide local facilities for the City's workforce, enhance the City's vibrancy, and may serve the City's residential communities. Given that most of the City's retail provision is tailored towards City workers, it is important to retain units such as convenience stores that are within easy walking distance of the residential areas and meet the day to day needs of surrounding communities. Unless they are subject to specific planning conditions, such units could be converted to any Class E commercial, business and service use without planning permission.

#### How the policy works

5.2.24. The provision of new retail units, particularly comparison and convenience units, at ground floor level in existing and new development will be encouraged where these units do not have an adverse impact on the operation of office premises, provide an active frontage onto the street and do not have an adverse impact on the amenity of residents, workers or visitors by reason of noise, smells or fumes from the operation of the unit or servicing and deliveries. Use of ground floors for retail provides the opportunity to create more permeable buildings which can assist in reducing pressure for space on City streets.

## **Policy RE4: Specialist Retail Uses**

The City Corporation will seek to retain specialist retail uses and premises that are historically and culturally significant to the City of London.

### Reason for the policy

5.2.25. Within the City, there are some specialist retail uses and premises that cannot be found elsewhere, such as the historic Royal Exchange and the London Silver Vaults on Chancery Lane. These uses contribute to the City's visitor economy and to its cultural distinctiveness and should be retained and promoted.

### How the policy works

5.2.26. The City Corporation will work with owners, developers and occupiers to retain specialist retail uses and premises where it can be demonstrated that such uses are of historical or cultural significance. The City Corporation may attach conditions to planning permissions to ensure the retention or replacement of specialist facilities on the same site where they are impacted by development proposals.

## **Policy RE5: Markets**

Proposals for markets and temporary retail pop-ups will be encouraged where they:

- are of an appropriate scale and frequency for their location;
- would not have a significant adverse impact on the vitality and viability of existing retail centres within or outside the City;
- would not have a significant adverse impact on the amenity of nearby residents or business occupiers;
- would not unduly obstruct pedestrian and vehicular movement; and
- would not involve the permanent loss of open space or harm the character of that space.

### Reason for the policy

5.2.27. There is an increasing demand for temporary retail pop-ups and street food markets, such as the Guildhall Yard Lunch Market, which can support the local economy by generating increased vibrancy, retail diversity and footfall. These uses provide greater retail choice, enliven the public realm and increase the attractiveness of the City as a place to live, work and visit. Pop-up and meanwhile uses can minimise vacancies of retail premises while a long-term occupier is sought, and may be used to animate areas where construction works are taking place.

5.2.28. Street trading in the City is regulated by the City Corporation under the City of London Various Powers Act 1987 (as amended), which restricts permanent street trading but allows street trading to take place for temporary periods in specified locations. The exception is on Middlesex Street (Petticoat Lane) Market, which straddles the boundary between the City and Tower Hamlets, where licensed trading is permitted between 9am and 2pm on Sundays. Further information on licensing requirements is set out in the City Corporation's Street Trading Policy which is available on the Corporation's website.

5.2.29. Temporary street trading, where permitted under the Various Powers Act, can operate for up to 14 days in a calendar year under permitted development rights. Trading for longer periods will require planning permission. Market trading off City streets but within the curtilage of a building will similarly require planning permission if undertaken for a period of more than 14 days in a calendar year.

#### How the policy works

5.2.30. Proposals for markets or temporary retail pop-ups located within a building or its curtilage, should be ancillary to and complement the main use of the site. When assessing proposals for new permanent markets and opportunities for pop-ups, the City Corporation will consider the potential for significant adverse impacts on the trade of retailers occupying fixed units within the vicinity, together with impacts on the amenity of nearby residents or business occupiers, on pedestrian and vehicular movement or on open spaces.

## 5.3. Culture, Visitors and the Night-Time Economy

### Context

- 5.3.1. London has long been recognised as one of the world's great cultural cities. The City of London contains a huge concentration of arts and cultural facilities, which contribute to its uniqueness and complement its primary business function. These facilities include galleries, theatres, museums, heritage attractions, Livery Halls, libraries, places of worship and concert halls. In recent years a growing number of night-time entertainment facilities such as clubs, bars and event venues have located in the City, alongside the traditional historic public houses. Research undertaken for the City Corporation shows that growth in creative industries in the City between 2010 and 2016 has outpaced growth elsewhere in London and the UK.
- 5.3.2. The City's cultural offer is an integral element of the Square Mile, alongside the business City. The Barbican is identified as a strategic night-time location of national or international significance while Cheapside and Liverpool Street are identified as night-time areas of more than local significance in the London Plan. The City Corporation has ambitious plans for Culture Mile, as explained in the Key Areas of Change section.
- 5.3.3. The City Corporation has prepared Visitor and Cultural Strategies that promote the City as a high-quality visitor destination with an emphasis on world-class cultural facilities. It is estimated there are approximately 21.5 million business and leisure visits a year to the City and this is expected to grow as a result of an increased cultural offer and improvements to transport accessibility such as the Elizabeth Line and Bank Station upgrade. Suitable facilities and hotel accommodation are required to provide visitors with a pleasant experience whilst in the City.
- 5.3.4. Cultural and creative activity can contribute significantly to the quality of the environment and cultural experience, particularly where it enhances a sense of place. Public art can give visual pleasure and help to re-establish local identity and sense of place.

### **Strategic Policy S6: Culture, Visitors and the Night-Time Economy**

The City Corporation will maintain and enhance the City of London's contribution to London's world-class cultural offer and the City's communities will be able to access a range of arts, heritage and cultural experiences by:

- Providing, supporting, encouraging access to and further developing a wide range of creative and cultural spaces and facilities across the City, and delivering a major destination for culture and creativity in the north west of the City through the Culture Mile initiative;
- Requiring developers to submit Cultural Plans for major development outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer;

- Protecting and enhancing existing cultural buildings and facilities where a continuing need exists and ensuring there is no overall loss of cultural facilities or diversity in the City;
- Supporting the development of creative enterprise through appropriate workspace and digital infrastructure, particularly within Culture Mile;
- Allowing hotel development where it supports the primary business or cultural role of the City, and refusing new hotels where they would compromise the City's business function or the potential for future business growth;
- Enabling a vibrant evening and night-time economy, while ensuring that operators proactively manage night-time entertainment premises to minimise potential impact to residents and workers;
- Maintaining the City's existing collection of public art and culturally significant objects and pursuing opportunities to commission new, high quality pieces in appropriate locations; and
- Maintaining and enhancing the City's open spaces and/or streetscape to accommodate cultural events and activities that are accessible to all City communities and which celebrate the City's unique cultural offer.

#### Reason for the policy

5.3.5. The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. The international reputation and high quality of this cultural activity has a critical part to play in the vibrancy of the working environment and adds to the appeal of the City as a place to do business. It attracts an increasing number of visitors, with consequent economic benefits, and supports the mental, spiritual and physical well-being of residents and workers.

5.3.6. The City Corporation's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between. Culture is seen as being for everyone and is a driver of social mobility.

#### How the policy works

5.3.7. The City Corporation will require proposals for new development and changes of use to protect existing arts and cultural facilities where they are needed and where necessary require appropriate replacement. The City Corporation will work with developers and cultural and arts institutions to deliver new facilities where they support the City's Culture Mile ambition or enhance the attractiveness of the City as a business and cultural destination.

5.3.8. Developers will be required to submit Cultural Plans as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's creative and cultural offer for example by incorporating cultural activities or displays in ground floor

spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.

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

1. The City Corporation will resist the loss of existing visitor, arts, and cultural facilities, unless:
  - replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities; or
  - the use can be delivered from other facilities without leading to or increasing any shortfall in provision and it has been demonstrated that there is no demand for another similar use on the site; or
  - it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where this would facilitate the overall enhancement of visitor, arts or cultural provision within the vicinity or where it has been demonstrated that the existing facility has been actively marketed for its current or an alternative visitor, arts or cultural use at reasonable terms for such a use.

#### Reason for the policy

5.3.9. The vibrancy of the City's cultural offer depends on a broad network of arts and cultural organisations and facilities, and it is important that there is sufficient floorspace available to accommodate these uses. There is strong competition for buildings and sites from commercial uses in the City so it will be necessary to demonstrate that an existing arts or cultural use is no longer needed before a site will be allowed to change use.

5.3.10. There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches, and specialist retail premises such as the Silver Vaults in Chancery Lane.

5.3.11. Some cultural facilities fall within broad categories of land use under the Use Classes Order, enabling the change of use of any one land use to another within that class without requiring planning permission. For instance, museums, places of worship and exhibition halls all fall within Use Class F.1 (Learning and non-residential institutions). However, other uses such as theatres, concert halls and public houses are classed as sui generis, meaning that planning permission would be required to change them to any alternative use.

### How the policy works

5.3.12. Applicants will be required to demonstrate that an existing visitor, arts or cultural facility has been marketed and that there is no reasonable interest from relevant organisations. Information should be included which sets out the length of time the property or site has been marketed; the number of viewings; the comments from prospective purchasers or tenants (including reference regarding the suitability of continued visitor, arts or cultural use). Marketing will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.

5.3.13. The City Corporation has published guidelines for determining nominations for Assets of Community Value in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest. In determining whether a public house has heritage, cultural, economic or social value, the City Corporation will have regard to those guidelines as well as the characteristics outlined in the London Plan.

### **Policy CV2: Provision of Visitor Facilities**

The provision of facilities that meet the needs of visitors in new cultural developments and in nearby open spaces and the public realm will be encouraged, including:

- Seating and tables;
- structures and landscaping to enable children's play and provide facilities for school groups;
- suitable shelter from weather conditions;
- well-designed public convenience provision, including changing places toilets, accessible to all users;
- well-designed signage, way finding and links to visitor facilities and destinations;
- temporary pop-up art installations, galleries and spaces in appropriate locations;
- performance spaces and animation of key routes where appropriate.

### Reason for the policy

5.3.14. The City attracts large numbers of tourists in certain locations such as around St. Paul's Cathedral and near the Tower of London. This is expected to grow with new attractions such as the proposed relocated Museum of London in Smithfield attracting increased numbers of visitors. It is important that the City of London can offer a range of facilities and events which meet the needs of these visitors whilst creating a distinctive look and feel for the City.

## How the policy works

5.3.15. The City Corporation will work with developers and arts and culture institutions to ensure that new developments and open spaces near tourist attractions provide facilities that improve the experience for visitors and cater for how visitors use the space. These facilities must be capable of being accommodated without detracting from the setting of the relevant tourist attraction, the wider townscape or residential amenity.

### **Policy CV3: Hotels**

1. Proposals for hotels and other visitor accommodation will be permitted where they:

- do not result in the loss of viable office accommodation for which there is continuing need, as set out in Policy OF2;
- do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- include a range of complementary facilities accessible to the public;
- provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage, and taxis, appropriate to the size and nature of the development;
- are inclusive, meeting London Plan accessibility standards for new hotel bedrooms;
- ensure continuing beneficial use for historic buildings, including enhanced public access to and interpretation of that heritage, where appropriate; and
- address the sustainability challenges associated with the City's BREEAM priorities (energy, water, pollution and materials).

## Reason for the policy

5.3.16. While the majority of visitors are day-trippers, the City has seen strong demand for hotel accommodation in the last ten years, and in 2020 had 44 hotels, apart-hotels and hostels, providing over 6,700 bedrooms. The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041. This demand is driven by a projected increase of 42 million international visitor nights and a 15 million increase in domestic visitor nights. The City's projected share of this increase is 4,341 rooms. Based on past trends and hotel sites currently permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement. It should be noted that these GLA forecasts predate the Covid-19 pandemic but although there have been short term impacts on the tourism industry, the attractions of the City and of London as a visitor destination remain strong.

5.3.17. Hotel accommodation is important to cater for business visitors wishing to stay in the City, as well as leisure visitors. The amount of office floorspace will increase significantly in the next 20 years and the demand for business accommodation is

likely to increase. Visitor numbers are projected to increase, and the development of Culture Mile is likely to increase demand for hotel accommodation particularly in the north west of the City.

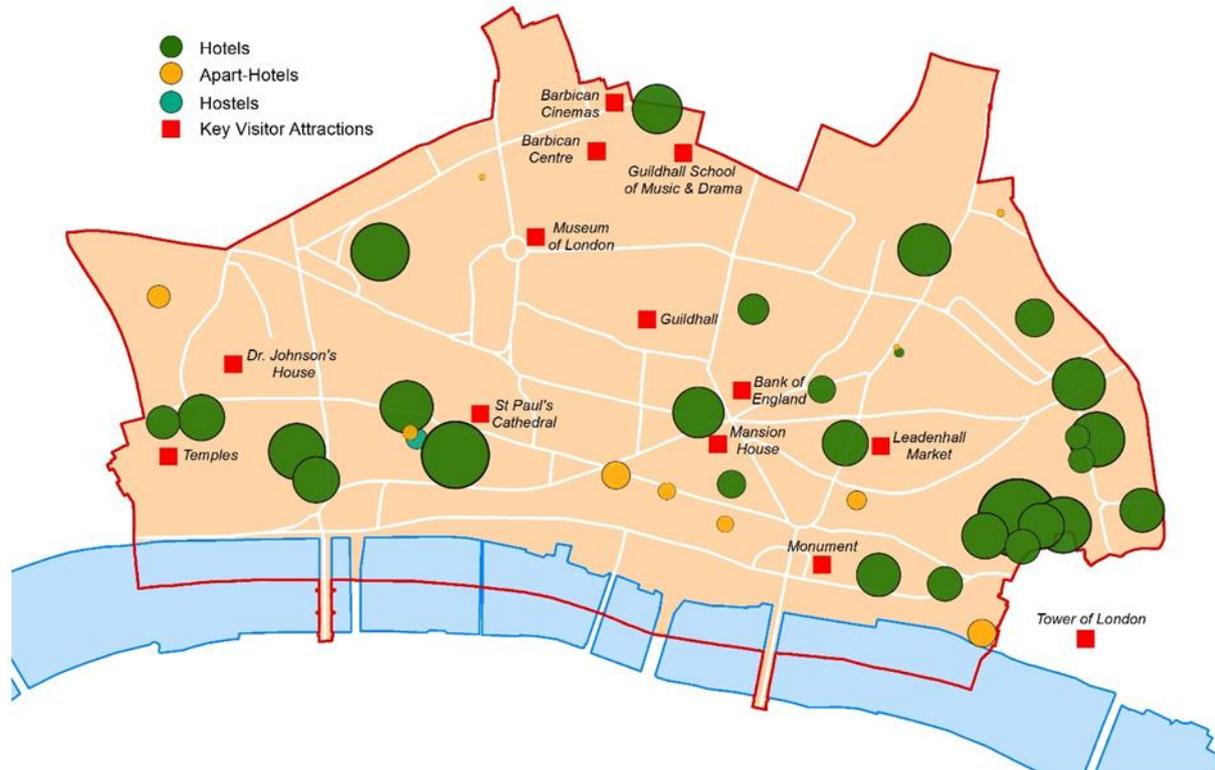


Figure 10: Hotel and visitor attractions distribution

### How the policy works

5.3.18. Policy CV3 applies to hotels, apart-hotels and serviced apartments.

5.3.19. Hotel development should not prejudice the primary business function of the City by displacing sites that are suitable for office accommodation. Hotel proposals will need to demonstrate that there would not be a loss of suitable and viable office floorspace, in accordance with Policy OF2 and the Office Use SPD.

5.3.20. Hotel development may be suited to listed buildings, providing an alternative use which could enable significant heritage features to be conserved and enhanced. Where such change of use is proposed, the City Corporation will seek improved public access to and interpretation of the building's heritage.

5.3.21. Hotels can cause amenity issues for surrounding occupiers, for example through noise nuisance or traffic and servicing impacts. New hotel proposals will be expected to prioritise access by walking, cycling and public transport. The location of entrances and exits, drop-off points and servicing and delivery arrangements will be considered in the context of surrounding occupiers. Where new hotels are

considered to be acceptable, they should enable the public to access facilities such as co-working space, meeting rooms, restaurants or leisure facilities in order to bring the maximum benefit to the City's communities.

5.3.22. Apart-hotels and serviced accommodation often display characteristics more associated with permanent, self-contained housing. Some are more akin to hotels in the type of services they provide but may result in different impacts. Apart-hotels/serviced apartments may therefore fall within the C1 or C3 Use Classes, depending on their characteristics. Factors that may affect the Use Class include;

- Presence of on-site staff/management;
- Presence of reception, bar or restaurant;
- Provision of cleaning and administrative services;
- Ownership of units/ability to sell on open market; and
- Minimum/maximum lease lengths.

5.3.23. Where apart-hotels and serviced apartments are considered to fall within the C3 (dwelling houses) Use Class, proposals will be assessed in accordance with the housing policies in this Plan including the requirement for affordable housing policies. Conditions will be used to ensure units are subject to minimum lease lengths.

5.3.24. For proposals within the C1 (Hotels) Use Class, planning conditions will be considered to ensure that units would not be used or occupied by permanent households as this would reduce the availability of accommodation for short-term visitors to the City and may prejudice the business City and put pressure on local services and infrastructure. Conditions will therefore be used to ensure units are subject to maximum lease lengths (typically 90 days).

#### **Policy CV4: Evening and Night-Time Economy**

1. Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
  - the amenity of residents and other noise-sensitive uses;
  - environmental amenity, taking account of the potential for noise, disturbance, waste and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
2. Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises and are encouraged to engage with nearby residential and commercial occupiers.
3. Where new residential development is proposed close to existing evening or night-time uses, the residential development will only be permitted if it includes suitable measures to mitigate potential disturbance and noise and air quality issues for prospective residents.

### Reason for policy

- 5.3.25. Evening and night-time entertainment is becoming an important part of the City's economy, bolstered by London's move toward becoming a 24-hour destination, growing numbers of workers and visitors, and the encouragement of arts and culture in the City. Expansion of the City's evening and night-time offer will be encouraged where it is compatible with neighbouring uses. Night-time entertainment has the potential to cause noise disturbance to nearby residents as well as other impacts such as anti-social behaviour, litter and odours. These adverse impacts need to be mitigated.
- 5.3.26. Anti-social behaviour can potentially be reduced by providing a broad range of evening and night-time activities that appeal to different customers, rather than concentrating one type of use in a particular area. This includes extending the opening hours of existing day-time facilities such as shops, cafes and leisure facilities, which can promote customer cross-over and create bridges between the day-time and night-time economy.

### How the policy works

- 5.3.27. The City Corporation will require the development responsible for change to manage the impact of that change – the 'Agent of Change' principle. This means that a new residential development built near to an existing night-time entertainment use would be responsible for providing appropriate soundproofing or other mitigation measures to avoid any undue impact, whereas a new night-time entertainment use opening in a residential area would be responsible for the necessary mitigation measures.
- 5.3.28. Night-time entertainment uses in the City include restaurants and cafes, drinking establishments, hot food takeaways and other related uses including, for example, a nightclub or a mix of such uses. They form part of the City's wider night-time economy.
- 5.3.29. The management of night-time entertainment and licensed premises is undertaken through the operation of both planning and licensing regimes. In general, the planning regime controls the location, design and planning use of premises to protect the amenity of an area or local residents, whilst the licensing regime is used, having regard to licensing objectives, to control specific activities at premises to prevent, for example, noise and other public nuisance. Changes to the Use Classes Order in 2020 allow flexibility for commercial premises including offices and shops to become restaurants and cafes without requiring planning permission. Licensing and environmental health legislation would need to be applied to address any potential nuisance to nearby occupiers in these circumstances, albeit that planning permission would be required for any physical works such as ventilation equipment associated with a restaurant or café use.
- 5.3.30. Planning and licensing regimes operate under separate legislative and regulatory frameworks. The City Corporation will ensure that, as far as is possible, a complementary approach is taken between planning and licensing within the legislative framework. The City Corporation publishes a Statement of Licensing

Policy, which outlines the approach that it will take when considering applications for the sale and supply of alcohol, the provision of regulated entertainment and the provision of late-night refreshment. This is supported by the City Corporation's Code of Good Practice for Licensed Premises. The City Corporation's Noise Strategy sets the strategic direction for noise policy within the City of London and outlines steps that the City Corporation will take, and is already taking, in dealing with noise issues, including those arising from night-time entertainment.

- 5.3.31. The character of many licensed premises has changed significantly in recent years. Existing and new premises often have longer operating hours, may have larger capacity and may provide live or recorded amplified music. Some of these premises are close to residential accommodation and this can result in disturbance and nuisance from excessive noise, particularly from people drinking and smoking outside, and arriving or leaving. Policy SA2 (Dispersal Routes) requires applications for night-time uses to include Management Statements setting out proposals for the dispersal of patrons.
- 5.3.32. All planning applications for restaurants and cafes, where planning permission is required, and for drinking establishments, hot food takeaways and related, uses should include information stating the proposed hours of operation. The City Corporation may impose conditions requiring the closure of the premises between the hours of 11pm and 7am where appropriate, such as near noise sensitive uses.
- 5.3.33. Potential applicants seeking planning permission for a night-time entertainment use, between the hours of 11pm and 7am, are expected to engage at the earliest possible stage with the City Corporation as Licensing Authority, the City of London Police, local residents and other neighbouring occupiers that will be affected by the proposal. This will ensure that the local context and local sensitivities are fully understood and can be taken into account when designing premises for night-time entertainment uses and planning the operation of the proposed use to minimise adverse impact on amenity. Policies HL3 and HS3 deal with noise and light pollution, and the residential environment respectively.
- 5.3.34. Proposals for new and extended night-time entertainment uses or for variations of planning conditions must be accompanied by a Management Statement that addresses planning amenity issues, sets out how potential impacts on amenity will be addressed through the design of the premises and how they will operate without causing disturbance including:
- hours of closure to protect amenity;
  - noise mitigation plans related to both internal and external noise, including measures to reduce sound transfer, such as soundproofing, noise controls and double entry lobbies;
  - the dispersal of patrons so as not to cause disturbance to residents;
  - arrangements for the storage, handling and disposal of waste;
  - a timed programme for deliveries and collections and other servicing arrangements;

- measures to deal with the emission of odours; and
- location of ventilation ducts and plant.

5.3.35. Assessment of the Management Statement will have regard to the City Noise Strategy, the provisions of the City of London Statement of Licensing Policy and to any submitted licence application operating schedule. It is recognised that it may not be possible to submit detailed Management Statements when details of the end use operator are not known. However, applicants should submit an outline Management Statement which considers physical design measures to minimise disturbance, such as those outlined in the paragraph above. In such cases, conditions will be attached to any planning permissions granted requiring full Management Statements to be submitted once the occupiers are known.

5.3.36. To safeguard quiet times and amenity, particularly for residents and other noise-sensitive uses, the City Corporation will attach planning conditions or seek s106 planning obligations to ensure compliance with agreed Management Statements. The City Corporation will normally apply conditions to limit the hours of operation where there is potential for unacceptable disturbance to local residents and others. Each case will be considered in relation to its locality and the need to strike a balance between the benefits to the City of night-time entertainment and the risk of disturbance to local residents, workers and others.

## **Policy CV5: Public Art**

1. The City's public realm and distinctive identity will be enhanced by:

- encouraging the provision of new artworks in appropriate locations in the City on public and private land;
- protecting existing works of art and other objects of cultural significance;
- ensuring that financial provision is made for the future maintenance of new public art;
- requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

2. The location of new and relocated artworks must take into consideration the health and safety of pedestrians, particularly those with disabilities, and other road users.

### Reason for the policy

5.3.37. Art can contribute significantly to the quality of the environment, particularly where it enhances a sense of place and local identity and is a form of community infrastructure. Public art includes temporary installations and non-physical works such as soundscapes.

- 5.3.38. Where appropriate, artworks can be multi-functional so that a variety of community needs can be met. Artworks may provide shelter from the weather, include sensory elements and provide play opportunities.
- 5.3.39. There are several arts events held regularly in the City including Sculpture in the City which forms a free public trail of works of art throughout the City.
- 5.3.40. The proposed public art must respect, and not detract from, the surrounding environment. Objects of cultural significance may include blue plaques, statues, monuments, fountains, memorials, parish boundary markers and other similar heritage assets.
- 5.3.41. Works of art must ensure that health and safety considerations are considered when designing, siting and maintaining the installation. Restriction of pedestrian flows must be avoided, and consideration given to ensuring that people with visual or mobility impairments are not placed in danger. Illuminated artworks must be sited to avoid light pollution impacting on nearby residential occupiers.

#### How the policy works

- 5.3.42. The City Arts Initiative (CAI) group advises the City Corporation on the artistic merit, siting, setting and appropriateness of public art proposals in the City. Temporary works of art (in situ for less than 8 weeks), which do not require planning permission, will be considered by the CAI group.
- 5.3.43. Opportunities for public art in open spaces should be considered at an early stage to ensure that they are satisfactorily integrated into the design of development and applicants should work with artists at an early stage of design. Where works of public art are sited in the public realm, they should be endowed to secure their appropriate maintenance in perpetuity and their retention will be secured by condition or legal agreement. Where works of art are on private land, it is expected that those pieces will be maintained to a high standard by the landowner. The City Corporation may seek contributions through s106 obligations towards the provision of new public art and the future maintenance of public art.

## 5.4. Smart Infrastructure and Utilities

### Context

5.4.1. The City of London relies on a range of utilities to function as a global financial, business and cultural centre and to meet the needs of its businesses, workers and residents. There are challenges to providing the infrastructure required to support existing activity in the City and to provide the infrastructure necessary to deliver the level of growth envisaged in the period up to 2036. At the same time, new developments and existing occupiers can actively minimise their demands on infrastructure, utilities and services to ensure that the City can become a more sustainable place to work, live and visit.

5.4.2. Utilities infrastructure comprises the provision of electricity, gas, water, sewerage, sustainable drainage (SuDS), telecommunications, including wired and wireless infrastructure, decentralised energy networks and the pipe subway networks that accommodate such infrastructure.

### Strategic Policy S7: Smart Infrastructure and Utilities

1. To coordinate and facilitate infrastructure planning and delivery all development should:
  - Minimise the demand for power, water and utility services;
  - Incorporate sustainable building design and demand management measures;
  - Connect to existing pipe subways where feasible, particularly where there is pipe and cable congestion under the streets;
  - Seek to provide the latest and best quality utility infrastructure and connections to serve the development;
2. Developers must engage with infrastructure providers at an early stage of design to ensure that the infrastructure needs arising from the construction and operation of new development are addressed and required utility networks and connections are in place in time to serve the development.
3. Existing essential utilities and telecommunications infrastructure will be protected from development unless it is no longer required or will be adequately relocated.
4. The improvement and extension of utilities infrastructure should be designed and sited to minimise adverse impacts on the visual amenity, character and appearance of the City and its heritage assets.

### Reason for the policy

5.4.3. There are specific challenges to providing the infrastructure needed to support existing activity in the City and the additional infrastructure necessary to support the scale of development set out in this Plan:

- The dense concentration of business activity in the City means that high demand is concentrated in a small geographical area.
- There is a legacy of congested cable routes under the City's streets.
- Delivery of new infrastructure and improvements to existing networks may result in temporary disruption to businesses, residents and visitors.
- Energy and telecoms demands are increasing and there is a need to continually improve and upgrade networks to meet this changing demand in a sustainable way, which does not compromise the City's trajectory towards zero carbon.

#### How the policy works

5.4.4. The City Corporation has established strong links with the various infrastructure providers that service the City, including Thames Water, UK Power Networks, Cadent Gas, Citigen and telecoms providers. The City Corporation will seek to retain and strengthen these links, working with all providers and regulators, where appropriate. Developers will be required to demonstrate liaison with infrastructure providers at an early stage of building design, ensuring that future needs are planned and delivered in a timely fashion with minimal disturbance to City streets, businesses and residents.

#### **Policy IN1: Infrastructure provision and connection**

1. Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for:
  - Electricity, gas and water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands. Temporary Building Supply for the construction phase should be identified in conjunction with electricity providers including the estimated load capacity, substations and route for supply;
  - Heating and cooling demand and viability of provision via decentralised energy networks. Designs must incorporate connections to existing decentralised energy networks where feasible;
  - Digital and telecommunications network demand, including full fibre wired and wireless infrastructure in line with the Mayor of London's 'Wired Score' connectivity rating or equivalent, planning for dual entry through communal entry chambers and flexibility to address future technological improvements;
  - Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
2. To avoid delays to prospective tenants, developers should consider pre-installing fibre optic and other communications networks into the new development.

3. Developers should conduct mobile signal tests within the development and consider the need for in-building mobile solutions where coverage is poor.
4. Development should aim to avoid reducing mobile connectivity in surrounding areas, and if that is not possible suitable mitigation measures will be required. Provision should be made on buildings or in the public realm to accommodate well-designed and located mobile digital infrastructure.

#### Reason for the policy

- 5.4.5. The dense concentration of businesses means that high demand is focused in a restricted geographical area. Electricity, telecommunications, water, gas and district heating and cooling networks are of particular importance. Congested cable routes traverse the City under its streets. Energy demands are increasing, particularly to provide air conditioning to counter increased warming and the delivery of upgraded ICT networks required by financial and business services. The impact of Covid-19 has highlighted the importance of digital connectivity. Recovery from the pandemic offers an opportunity to speed up the transition to a digital economy, accelerating the adoption of remote and home working, e-learning, e-commerce and telemedicine.
- 5.4.6. The City Corporation's Infrastructure Delivery Plan sets out in more detail the infrastructure projects that are under construction or required.

#### How this policy works

- 5.4.7. Developers must liaise with utility providers and adopt best practice in assessing and improving connectivity within developments. Connection layouts and future proofing should be considered in the design of the development.
- 5.4.8. Addressing air pollution is a fundamental concern for the City Corporation. Developers must engage with energy providers prior to commencement of development works to ensure the availability of Temporary Building Supplies, avoiding the need for diesel generators to provide electricity.
- 5.4.9. Delivery of new infrastructure and improvements to existing networks could result in temporary disruption to businesses, residents and visitors. Developers must co-operate with infrastructure providers to minimise disruption to highways and businesses during major infrastructure upgrades and pipe subway construction.
- 5.4.10. It is essential for the City to be digitally connected and responsive to the changing requirements of business, equipping businesses to benefit from the digital transformation stimulated by the Covid-19 pandemic. Buildings must be equipped to meet the digital needs of current and future occupiers. Developers will be expected to undertake an assessment of the connectivity of major new office buildings or refurbishments, using a wired certification such as WiredScore. Development should result in an improvement in the City's digital connectivity.
- 5.4.11. Mobile connectivity within and around buildings is critical to the City of London. Developers will need to ensure that their buildings do not worsen existing signal

strength in the area and consider the provision of in-building solutions where signal strength is poor. The roll out of 5G across the City will require additional mobile infrastructure and suitably located cells. Where feasible, provision for new cells should be incorporated into new development. Where this is not feasible, provision should be made for additional cells to be located in the public realm, on existing street furniture or elsewhere as appropriate.

5.4.12. The City Corporation will encourage the improvement and extension of utilities networks to ensure that the City uses the latest technology and continues to provide good quality services for businesses, residents, students and visitors. The City Corporation's 'City Developer Guidelines for Incoming Utility Services' provides guidance on best practice.

### **Policy IN2: Infrastructure Capacity**

1. Development must not lead to capacity or reliability issues in the surrounding area and capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.
2. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers to facilitate appropriate improvements which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.
3. Developers are required to demonstrate, through effective engagement with providers, that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation.

#### Reason for the policy

5.4.13. Early engagement with infrastructure providers is essential to ensure that there is adequate capacity to serve the development during its construction and operational phases.

#### How this policy works

5.4.14. The Sustainability or Energy Statement submitted as part of the planning application should set out the demand management measures incorporated into the scheme and should include evidence of engagement with providers.

5.4.15. Infrastructure provision must be completed prior to the occupation of the development. The City Corporation will expect development to promote and contribute towards a low-carbon based economy, through smart buildings and incorporating alternative solutions into the design. It will be necessary for developers to establish if the proposal would lead to overloading of the existing infrastructure, which may involve studies being undertaken by utility providers. Adequate time should be allowed to consider the supply options and to enable utility providers to collate an informed response.

5.4.16. Projections of infrastructure demand should be realistic. Over specification should be avoided as it could result in under-utilisation of infrastructure. The cumulative impacts should be considered through discussion with providers and pre-application meetings with the City Corporation. The co-ordination of infrastructure works is essential to minimise disruption and the impact on existing services.

5.4.17. Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands.

5.4.18. Redundant plant should be removed where possible to facilitate future infrastructure connections. Redundant infrastructure within the public realm, such as telephone boxes, should be removed unless it is of heritage interest.

### **Policy IN3: Pipe Subways**

Developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes where these are available. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

#### Reason for the policy

5.4.19. Expansion and integration of pipe subway and decentralised energy networks is a long-term aspiration of the City Corporation. The provision of additional pipe subways would provide greater capacity for pipes and cables, reducing the need for street works which often cause disruption. Pipe subways accommodate gas and water mains and electricity more effectively with easier access for maintenance, rather than burying pipes which are then not easily accessible.

#### How the policy works

5.4.20. The City Corporation will seek the expansion and integration of development into the pipe subway network where there is sufficient evidence to demonstrate that services to development would be better integrated within an established pipe subway. Given the cost of installing new pipe subways, it is especially important to make efficient use of the existing network. Developments which are located adjacent to existing pipe subways will normally be expected to install connections.

# 6. Shape Outstanding Environments

## 6.1. Design

### Context

6.1.1. The built environment of the City of London has a unique and distinctive character. Arranged on a predominantly medieval and Roman street pattern, high quality historic and modern buildings and urban green spaces create a rich visual landscape of building types, materials and architectural design. The City of London has a nationally and internationally renowned townscape. The City has been a centre for international trade for centuries and this long history of commercial activity and its modern role as a world-leading financial and professional services centre is reflected in the design of the buildings and their activities.

6.1.2. The demand for additional office floorspace and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape which presents challenges and opportunities to ensure that new development delivers good growth. Innovative and creative solutions are required to optimise the use of land as a scarce resource, while creating architecture of a world class standard which enhances the City's rich character.

6.1.3. To realise the City Corporation's vision for the Square Mile, the design of the built environment should contribute towards the delivery of a competitive and creative City with exemplars of sustainable building design. Development should contribute towards the aim of achieving a zero emission and climate resilient City by 2040 in accordance with the City Corporation's Climate Action Strategy.

### Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces. Design solutions should make effective use of limited land and contribute towards well-being and a greener, zero emission City, through development which:

#### Form and Layout

1. Optimises pedestrian movement by maximising permeability, providing external and internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
2. Is pedestrian-focused, reducing conflict between pedestrian and vehicular traffic, creating a safe and attractive public realm, prioritising pedestrians and cyclists, whilst mitigating the impact of building servicing;
3. Delivers publicly accessible space within the development by maximising the amount of accessible, inclusive and free to enter roof terraces and spaces, including in tall buildings and along the river and around City landmarks; and

4. Delivers world class sustainable buildings which are mixed-use, adaptable, adopt circular economy principles and contribute towards a zero emission, zero carbon and climate resilient City.

### **Experience**

5. Optimises micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views;
6. Delivers street level building frontages which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance;
7. Optimises the amount of green infrastructure and amenity space integral to the architecture, enhancing public access to nature and biodiversity through maximising the provision of green roofs, walls and trees; and
8. Delivers inclusive buildings, streets and spaces that meet the access needs of all the City's communities irrespective of background or circumstance.

### **Quality and character**

9. Delivers high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the local and wider character and appearance of the City and is appropriate to its neighbours;
10. Incorporates sustainability measures and other plant and building services into a coherent architectural design;
11. Considers lighting as an integral part of the design process, addressing issues of light spill/trespass to the public realm and the character of the area;
12. Incorporates signage of an appropriate siting, size, form, appearance and illumination within the architecture of the building;
13. Incorporates necessary security and safety measures as an integral part of the design; and
14. Ensures that the building design concept is maintained from permission through to completion of a project.

### Reason for the policy

- 6.1.4. As a world leading financial and professional services centre, the City requires world leading design in all aspects of the built environment, including the sustainability of new and refurbished buildings.

## How the policy works

- 6.1.5. To create a zero-emission, sustainable City, development must be designed to minimise environmental impacts and be resilient to climate change throughout its lifecycle.
- 6.1.6. The City of London will continue to be at the forefront of delivering the highest and most sustainable design standards. All development should demonstrate how it delivers the highest standard of design while also respecting its surroundings and the unique character and history of the City. Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. The diversity of the townscape means that different design considerations apply to each site and these need to be carefully assessed to take account of each building's context. This should not constrain design approaches, and a range of solutions may be appropriate. Liaison with the City Corporation, the City of London Police and the London Fire Brigade is essential at an early stage of design to ensure that buildings and spaces are safe and secure and reduce the potential for anti-social behaviour.
- 6.1.7. The City Corporation will use a variety of modelling techniques to assist in the determination of planning applications. Developers will be required to use modelling techniques to demonstrate compliance with the City Corporation's microclimate and thermal comfort planning advice notes. The City Corporation will use 3D digital modelling technology to assist in considering the visual impact of development, enabling an assessment to be made of the impact of development on townscape and skyline. Developers will be required to provide digital 3D visualisations of their developments in an open source or other format compatible with the City Corporation's 3D digital modelling technology.
- 6.1.8. The City has a large workforce whose numbers are expected to grow substantially, albeit that increased remote working means that actual footfall may not rise in proportion to total employment. Most journeys within the Square Mile are on foot and pedestrian movement is particularly high during morning and evening peak times. The City has retained much of its historic street pattern, which provides convenient walking routes and allows for a high degree of pedestrian permeability. The City Corporation uses pedestrian modelling to better understand pedestrian flows and to manage the impact of proposed new development. The Transport Strategy sets standards and targets for pedestrian accessibility which will be implemented, in part, through this Plan.
- 6.1.9. The City has numerous small open spaces, which provide valuable amenities, many of which are of historic importance. The design of these small spaces requires innovative and sensitive design solutions which respect their character and setting and create high quality, accessible areas for all the City's communities. The City's streets provide space for public enjoyment, and the City Corporation has a programme of public realm enhancement projects to improve the quality, sustainability, inclusivity and amenity of the public realm.

6.1.10. The City provides significant employment, residential and leisure opportunities that should be accessible to all. Accessibility to new and existing buildings and spaces must create an inclusive environment. Adaptation of historic buildings requires careful design solutions. The City Corporation has an active programme of implementing access adaptations and will prepare further guidance for developers.

### **Policy DE1: Sustainability Standards**

1. All development must demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development.
2. Proposals for major development will be required to:
  - achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, pollution and materials);
  - demonstrate that London Plan carbon emission and air quality requirements have been met on site, retaining embodied carbon within building structures where feasible. In exceptional circumstances where standards cannot be met on site offsetting will be required to account for the shortfall;
  - demonstrate climate resilience in building and landscape design; and
  - incorporate collective infrastructure such as heating and cooling networks, smart grids and collective battery storage wherever possible, to contribute to a zero-emissions, zero-waste, climate resilient City.

#### Reason for the policy

6.1.11. The drivers for sustainable development are increasing, affecting global and local businesses, workers, residents and visitors. The businesses that survive will be those that embrace sustainability and responsible consumption. The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City’s priorities:

- Energy, carbon emissions and air pollutants – reducing emissions and moving to a zero emissions and zero carbon city by 2040, in line with the requirements of the City Corporation’s Climate Action Strategy;
- Water – reducing water use in an area of serious water stress;
- Pollution – reducing exposure to poor air quality;
- Materials – retaining embodied carbon in existing buildings and materials, and improving resource efficiency.

6.1.12. Social and environmental responsibility is high on the agenda for many City businesses and their workforce and a working environment that supports these

goals is essential for the City's future. The London Plan provides a framework for driving forward this agenda, but it needs to be implemented at a local level.

- 6.1.13. The City of London Zero Emissions Study 2018 provides evidence for the trajectory to a zero emissions City. The role of collective infrastructures such as smart grids, battery storage, heating and cooling networks and hydrogen infrastructure are highlighted as essential elements of a future zero emissions City, where decarbonised electricity that does not contribute to future local levels of pollution, is the main energy source. Heating and cooling networks will increasingly exploit low carbon energy from waste heat and heat pump technologies rather than fossil fuels and contribute to reductions in primary energy demand, carbon emissions and nitrous oxides. Therefore, connection to these networks is expected wherever feasible, subject to appropriate decarbonisation plans.
- 6.1.14. The City Corporation has adopted a Climate Action Strategy which sets out a trajectory towards zero carbon in the City of London by 2040, and actions required to ensure that the City is resilient to the impacts of climate change. The application of sustainability standards through this Plan will contribute to the achievement of these objectives. Guidance in the area of sustainable development is rapidly evolving. Applicants should use the most up to date guidance to inform their planning proposals.

#### How the policy works

- 6.1.15. The requirement for the highest feasible and viable sustainability standards applies to all development in the City, including major new development, extensions to existing buildings, major refurbishments and minor development. Refurbishments of existing buildings are subject to this policy where proposed works constitute development. Refurbishments bring the benefit of re-using some of the existing building's embodied carbon. Standards required are those that are in place at the time of submission of a planning application.
- 6.1.16. Sustainability Statements should be used to provide comprehensive evidence of the sustainability of each development.
- 6.1.17. For major development the Sustainability Statement should include:
- a BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City's priority credits and identify any performance gaps between design and completed development.
  - an energy assessment in line with the Mayor's Energy Planning Guidance. Where carbon offsetting is required, this will be secured through a S106 agreement with offsetting contributions ring fenced for carbon reduction projects in the City or elsewhere.

- an air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality, in line with the City of London Air Quality SPD.
- details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.
- Details of collective infrastructure which has been incorporated to address environmental challenges.

#### **Extensions:**

- If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets and BREEAM requirements.

#### **For minor development**

- Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.

### **Policy DE2: New Development**

1. Development should be of a world-class standard of design and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted.
2. The design of all new development must ensure that:
  - The bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of the area, enhancing pedestrian permeability;
  - Appropriate, high quality, low carbon, sustainable and durable materials are used;
  - The design and materials avoid unacceptable wind, loss of sunlight and thermal comfort impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
  - Development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

- Proposed uses can be accommodated within the curtilage of the development and do not rely on use of the public realm;
- Plant and building services equipment are fully screened from view and integrated into the design of the building;
- Servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- There is provision of appropriate hard and soft landscaping, including appropriate boundary treatments and urban greening;
- Buildings are inclusive and accessible to all;
- Security and safety measures are incorporated into the design at an early stage to avoid the need to retro-fit measures that adversely impact on the public realm or the quality of design; and
- Opportunities are taken to enhance the appearance of the roofscape.

#### Reason for the policy

6.1.18. The network of routes and spaces, the scale, form, architectural expression and detailed design of buildings, together with the use of particular building materials, and the contribution of these elements to the composition of street blocks are characteristic of, and combine to produce, the close-knit and intricate townscape of the City. It is important that new buildings and alterations respect and reinforce this general character. The City has dynamic, striking and internationally acclaimed architecture as well as more contextual buildings appropriate to their townscape setting.

#### How the policy works

6.1.19. In assessing development schemes detailed consideration will be given to the bulk and massing and special characteristics of their locality. All development proposals are expected to have a high standard of design and architectural detailing.

6.1.20. Wind conditions and solar glare may have an adverse effect on the surrounding townscape and the quality and use of the public realm. Assessments will need to be carried out on the impact of proposed development on wind conditions, thermal comfort and solar glare. Any adverse impacts will need to be mitigated and appropriate measures to achieve this should be integrated into the design of the development. The City Corporation has published guidelines for developers on wind microclimate studies required to support planning applications. Further guidance is available on solar glare, solar convergence and sunlight impacts of development. The City Corporation will publish a further Planning Advice Note for developers on addressing thermal comfort in the public realm.

- 6.1.21. The design and execution of extensions and alterations to buildings, such as entrances and windows, are of considerable importance since they have a cumulative effect on the overall character and appearance of the City. Extensions or alterations should be considered in relation to the architectural character of the building, designed to minimise their impact and integrated into the design of the building. Alterations and extensions should achieve a successful design relationship with their surroundings, taking full account of the local context and the setting of the building.
- 6.1.22. In most buildings, the ground floor elevation has the most effect on public amenity, so its design should be given particular attention to ensure that it is legible, visually attractive and provides active frontages. Blank frontages and ventilation louvres should be avoided. Ventilation louvres, where necessary, should be located away from busy streets. Servicing entrances should be carefully designed to minimise adverse effects on the townscape.
- 6.1.23. Buildings must be able to accommodate proposed uses within the curtilage of the development, including provision of tables and chairs. Proposed uses must not rely on the use of space in the public realm, including the use of public highway.
- 6.1.24. The City of London has many public and private viewing galleries, terraces and tall buildings, meaning that many workers, residents and visitors see the townscape from above. Attention should be given to the form, profile and general appearance of the roofscape to ensure that it complements the building as viewed from surrounding buildings as well as from the ground. The potential to add visual interest to a roofscape, including greening, should be designed in from the outset.
- 6.1.25. Plant should be located below ground. Where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. It should be enclosed and covered where it would otherwise harm the appearance of the building, the general scene, or views from other buildings. Intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants. Consideration should be given to the use of external heating and cooling supplies from district heating and cooling networks, such as the Citigen network, where available, as these may avoid or reduce the need for roof top installations such as boiler flues, cooling towers and plant rooms, as well as providing wider environmental benefits.
- 6.1.26. Servicing entrances can have a detrimental impact on the appearance of the building and its immediate setting and can harm otherwise attractive pedestrian routes. The City Corporation expects innovative design solutions for servicing entrances and adjacent areas to minimise their visual impact and to enable them to be integrated into the design of the building. Design solutions must respect the sensitive nature of listed buildings and conservation areas. Gates and doors should be well designed and should be kept closed when the entrance to the service bay is not in use.

6.1.27. Ventilation or extraction systems should be routed internally and extensive or unsightly external ducting will not normally be permitted. Provision must be made within the building for services and ducting to and from all uses. Ventilation systems in new build premises for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent smells and emissions adversely affecting neighbours. For changes of use, developers and/or occupiers should investigate the potential to vent emissions to the roof. Where it can be demonstrated that venting of such emissions to the roof is not practical, venting to an adjacent footway will only be acceptable where the extraction system is of the highest specification for odour abatement and there is no adverse impact on neighbours by virtue of smells or other emissions. Other ventilation louvres should not be sited by adjoining footways. Developments should incorporate suitable off-street facilities for smokers wherever possible to avoid the need for smokers to congregate on the pavements.

6.1.28. Developers should provide suitable rooftop ventilation for the City's sewer network, where appropriate, and this should be integrated into the design of buildings.

6.1.29. Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development.

### **Policy DE3: Public Realm**

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of the streets and spaces between buildings and the creation of new spaces. Public realm schemes must be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- The predominant use and function of the space and adjacent spaces;
- The use of sustainable natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- The inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- The City's heritage, identifying and retaining features that contribute positively to the character, cultural experience and appearance of the City;
- The provision of sustainable drainage, where feasible, co-ordinating the design with adjacent buildings to facilitate the implementation of rainwater recycling;
- The need to provide accessible and inclusive design that meets the needs of different users, ensuring that streets and walkways remain uncluttered and enhance pedestrian permeability;
- The need to provide a high quality, safe and functional public realm;

- The sensitive co-ordination of lighting with the overall design of the scheme; and
- The wellbeing of users in relation to air pollution, noise, temperatures, shading and microclimate.

### Reason for the policy

6.1.30. The City Corporation will actively promote schemes for the enhancement of the street scene and public realm. High quality natural materials are characteristic of the City of London and add greatly to the character and identity of streets, courts and spaces. Wherever possible, the City Corporation will retain these surface materials and will carry out repairs to match and extend their use. Elsewhere, the City Corporation will encourage a limited palette of materials, providing continuity in the streetscape, and ease of access through the City.

### How the policy works

6.1.31. The City Corporation will undertake public realm enhancement works through specifically targeted projects or in association with general street maintenance and vehicle, cycle and pedestrian traffic management schemes. The City Corporation will use s106 planning obligations, s278 highways contributions, the Community Infrastructure Levy and funding from external sources to deliver enhancement works.

6.1.32. All projects in the public realm should be inclusive in design so that they provide equal access for all people in the City. Consideration should be given to design features which prevent damage from the activities of skaters, such as metal studs incorporated into street furniture and hard surfaces. Designs should be robust and durable and use sustainable and low carbon materials.

6.1.33. The incorporation of artworks or integral decorative features, such as sculptures, fountains and schemes included in the City Arts Initiative, to create animated spaces, will be encouraged. Early consideration of their design, management and maintenance regime. Detailed guidance is provided in Policy CV5.

6.1.34. Further information on design requirements for the public realm is available in the City Public Realm SPD, the City Public Realm Technical Manual, Conservation Area Character Summaries and Management Strategies, where appropriate, and the Mayor of London's Streetscape Guidance.

## **Policy DE4: Pedestrian permeability**

1. Improved wayfinding will be sought through public realm improvements. Development will be required to contribute towards the improvement of pedestrian permeability in the City by:

- Providing legible, good quality, safe and low pollution pedestrian connections between spaces;

- Providing new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City's characteristic network of accessible buildings, streets, courts and alleyways;
- Providing publicly accessible ground floors for improved pedestrian movement, where feasible;
- Providing pedestrian routes that are of adequate width, step-free and follow best practice in street design to encourage ease of movement.

2. Developments should enhance pedestrian permeability and not lead to the loss of routes and spaces that enhance the City's function, character and historic interest.

#### Reason for the policy

6.1.35. The intensification of the use of buildings and the increase in the City's working population are putting added pressure on the capacity, convenience, comfort and safety of the spaces, streets, lanes and alleys at the heart of the City. Peak times are particularly busy for all forms of transport, and the potential for conflict between modes of travel is increased.

6.1.36. Most travel in and through the City is on foot. The City Corporation has adopted Transport for London's Legible London as a means of improving wayfinding within and through the City of London.

#### How the policy works

6.1.37. In order to reduce pedestrian congestion and improve pedestrian access through the public realm, new pathways for moving through the City will need to be created or re-established. Spreading the footfall across a wider area will help to create a more vibrant and comfortable street network.

6.1.38. Development will be expected to deliver net gains in the public realm, through the establishment of new pedestrian routes around and through buildings, having regard to the cumulative impact of their development alongside existing and permitted development on the capacity of pedestrian routes. Publicly accessible ground floors will be encouraged where pedestrian desire lines would otherwise be affected and permeability of the City compromised. The City Corporation has developed a block size analysis which identifies large impermeable street blocks across the City in order to prioritise the identification of new pedestrian routes through development proposals. Over the Plan period the aim is to reduce the proportion of larger street blocks (shown in blue on Figure 11) and to increase the proportion of smaller blocks.

6.1.39. Developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London totems, where necessary.

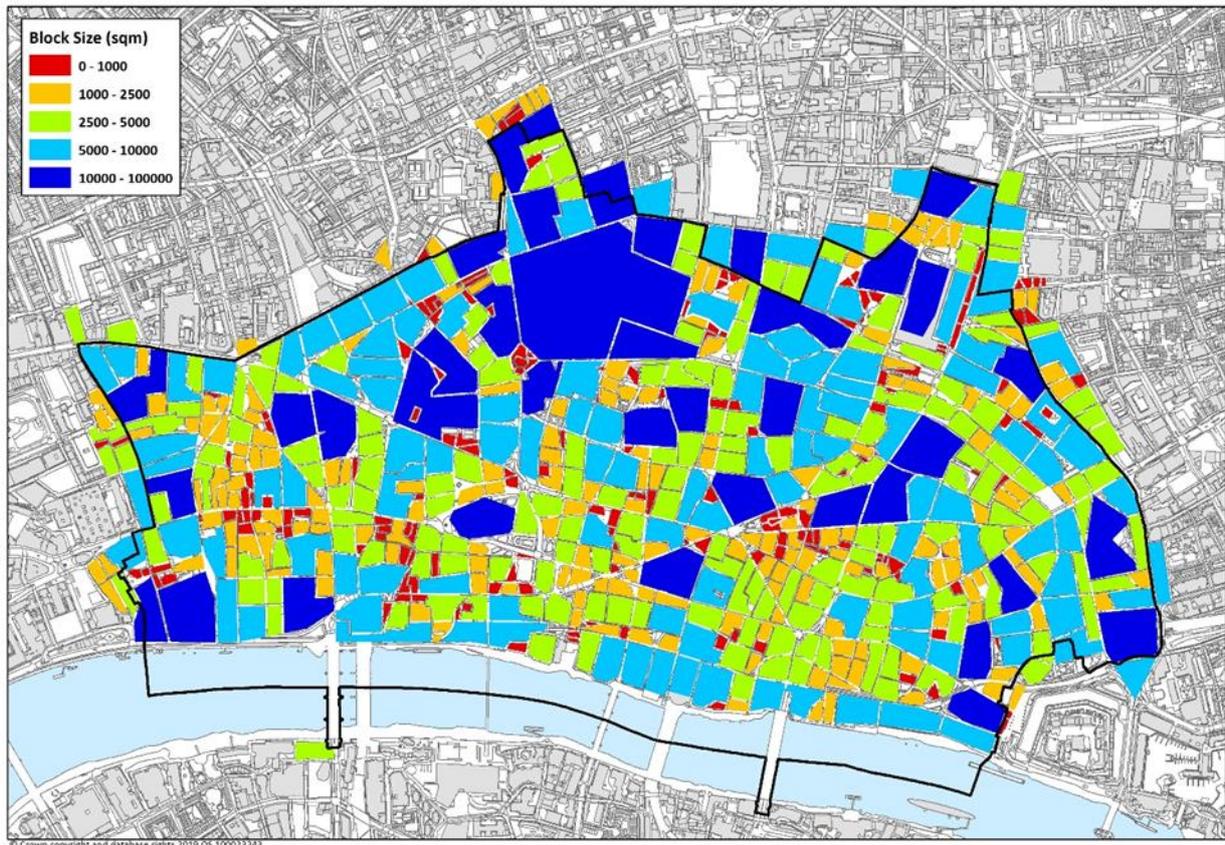


Figure 11: Block Size Analysis

## Policy DE5: Terraces and Viewing Galleries

### 1. Roof terraces will be encouraged where:

- The roof terrace is visually integrated into the overall design of the building when seen from both street level and higher-level viewpoints;
- There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative;
- Historic or locally distinctive roof forms, features or structures can be retained and enhanced;
- There would be no adverse impact on protected views;
- The design and layout of the terrace optimises the potential for urban greening;
- Emissions from combustion plant will not affect users of the terrace.

2. Where roof terraces and viewing galleries are proposed, security risks must be addressed at the design stage and space for security checks incorporated into the development, where required.
3. The provision of free to enter, publicly accessible areas will be required as part of all tall building or major developments, which may include roof gardens and terraces or public viewing galleries at upper levels, where appropriate.

#### Reason for the policy

6.1.40. Roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.

#### How the policy works

6.1.41. The City Corporation encourages proposals for roof gardens and terraces where they are sympathetic to existing roof forms and features, particularly those of historic interest or which are otherwise locally distinctive and where they do not impact adversely on residential amenity. There should be no impact on strategic or locally protected views.

6.1.42. Where roof terraces and gardens are publicly accessible entrances should not result in safety or security concerns, create congestion or adversely impact on the environmental quality at street level. Security implications should be considered at the design stage of the development, including making provision for security checks within the development, where required. Opening hours may be managed by condition or agreement, particularly where there are residential premises nearby. Roof terraces should not significantly increase noise levels, or result in unacceptable light spillage in areas with residents or other sensitive uses. Appropriate safety features should be included to prevent people from jumping or falling. The City Corporation is producing guidelines to advise developers on best practice to reduce the potential for suicides from tall buildings. The positioning of combustion flues should be carefully considered so as to not expose users of the roof terrace to pollution emissions from combustion plant.

6.1.43. Public access to tall buildings within the City is important in creating an inclusive city. Tall buildings should provide publicly accessible areas which are free to enter. These may include public viewing galleries at upper levels or other forms of open space provision and may provide retail, leisure or educational facilities to enhance their attraction.

## Policy DE6: Shopfronts

Shopfronts should be of a high standard of design and appearance; inappropriate designs and alterations will be resisted. Shopfront proposals should:

- Respect the quality and architectural contribution of any existing shopfront;
- Maintain the relationship between the shopfront, any fascia, the building and its context;
- Use materials which are sympathetic to the wider context and are of high quality;
- Ensure that signage is in appropriate locations and in proportion to the shopfront;
- Take into account the impact of louvres, plant and access to refuse storage;
- Ensure that awnings and canopies are positioned only in locations where they would not harm the appearance of the shopfront, obstruct architectural features or views and are in compliance with highway requirements;
- Avoid openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity of the area;
- Avoid external shutters and contain alternative security measures, where required;
- Avoid opaque windows and provide retail displays which encourage browsing and passive surveillance;
- Ensure that the design is inclusive incorporating level entrances and adequate door widths; and
- Ensure that internal shop lighting does not create inappropriate light spillage into the public realm.

### Reason for the policy

6.1.44. Shopfronts are important elements in the townscape and can contribute significantly to the street scene. The design of a shopfront should recognise this and be appropriate to, or enhance, the building and its location. It should respect the design of the building and not obscure, or result in damage to, existing architectural features.

6.1.45. Existing shopfronts should be retained where they contribute to the appearance or special interest of a building or the street scene, particularly in listed buildings or conservation areas, or those that are of design or historic significance in their own right or as part of a group. Any modifications necessary should be sympathetic to the original design.

### How the policy works

- 6.1.46. New shopfront proposals should relate to the upper floors of the building and surrounding buildings, providing consistency with neighbouring premises, where appropriate. New shopfronts should utilise high quality materials and finishes. The City Corporation will seek a reduction in fascias of excessive dimensions (height, width and depth), which are out of proportion or scale with the shopfront or have a detrimental visual effect on the building or the street scene.
- 6.1.47. Modification to shopfronts and shopfront designs to incorporate louvres, plant or refuse accommodation should be undertaken in a manner sympathetic to the design and character of the building where they cannot be accommodated in less sensitive elevations. Awnings and canopies, where appropriate, should be integrated into the shopfront design in relation to size, location and materials.
- 6.1.48. Fully openable shopfronts and large serving openings may be refused where they create a void at ground floor level that could harm the appearance of buildings and create potential amenity issues.
- 6.1.49. Required security measures should be internal to limit their visual impact on shopfronts. External security shutters are not normally acceptable, except where they are a characteristic of historic shopfronts. Internal shutters should be perforated to enable visibility into the shop and passive surveillance. To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.
- 6.1.50. Retail entrances should be designed with level entrances to enable inclusive access by all. Other measures and movable ramps should be used exceptionally where level entrance is not feasible.

### **Policy DE7: Advertisements**

1. Advertising must be of a high standard of design, restrained in amount and in keeping with the character of the City.
2. Excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level will be resisted.

### Reason for the policy

- 6.1.51. To protect and enhance the character of the City's streets, the City Corporation considers that advertising material should be restrained in quantity and form. Poor quality advertisements harm the street scene and the unique character of the City of London. The City Corporation will exercise advertisement control having regard to visual amenity and public safety and will seek improvements to the design of advertisements, where necessary.

## How the policy works

- 6.1.52. Advertising hoardings and advertisements on street furniture will not normally be permitted as these detract from the character of the City. The display of advertisements on construction site hoardings will be resisted unless directly related to the development site. Construction hoardings may, however, provide an opportunity to add interest to the street scene by including images and information about the development under construction. Further guidance is contained in the City Corporation's Hoardings Advice Note.
- 6.1.53. The design of advertising material should respect its locality and use appropriate materials of high quality. Advertisements should be appropriate to the frontage served and should not include static or moving projection of images beyond the frontage, such as laser projections and projections on building façades, to protect visual amenity and public safety. Illumination of advertisements should be discreet and incorporate LEDs to reduce the overall bulk and energy use of signage. Advertising flags and banners will not normally be permitted except where appropriate for cultural institutions. Rotating advertisements will be resisted as these detract from the City's character.
- 6.1.54. Particular care will be necessary with advertisements on or in the setting of listed buildings and within conservation areas. Internal illumination of advertisements in such areas will not normally be permitted.
- 6.1.55. Advertisements above ground level are detrimental to the appearance and visual amenity of the street scene and can detract from the character and qualities of individual buildings by obscuring architectural features and the City's streetscape and skyline. While there are exceptions, such as traditional or historic signs, signs in an elevated position will not usually be permitted.
- 6.1.56. Appropriate action will be taken to have unauthorised advertisements removed. The City Corporation's Transport Strategy requires that pavements are kept clear of obstructions through a range of actions, which include not permitting A-boards on the pavement and encouraging owners and occupiers not to place A-boards on private land adjacent to the pavement.

### **Policy DE8: Daylight and sunlight**

1. Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the Building Research Establishment's guidelines.
2. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context, minimising the need for artificial lighting.

### 3. Development should incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and public realm.

#### Reason for the policy

6.1.57. The City is an urban centre with a very high density of buildings, resulting in lower average levels of daylight and sunlight to buildings and spaces in comparison to suburban or rural areas. The amount of daylight and sunlight received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of daylight and sunlight is important for the mental health of workers and residents.

#### How the policy works

6.1.58. The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for Daylight and Sunlight' that set out a methodology for assessing changes in daylight and sunlight arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Given the importance of the City's open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines. Developers will be required to submit daylight and sunlight assessments in support of their proposals. The City Corporation may require independent verification of these assessments at the developer's expense.

6.1.59. When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. The City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site as well as the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive. The Mayor of London has indicated that guidance on daylight and sunlight standards will be produced to support the London Plan.

6.1.60. Planning considerations concerning daylight and sunlight operate independently of any common law rights and any light and air agreements which may exist. If a development is considered beneficial in the public interest and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.

## **Policy DE9: Lighting**

1. Lighting should be sensitively co-ordinated with the overall design of any new development, having regard to siting, scale, type, intensity and colour temperature of light. Development proposals should consider the lighting strategy early in the design process.
2. Development should incorporate measures to reduce light spillage from external and internal lighting, particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
3. The external lighting of buildings should contribute positively to the unique character and grandeur of the City townscape by night.
4. External lighting of heritage assets within the City must be sympathetic to the building and the wider context in terms of tone and brightness.

### Reason for the policy

- 6.1.61. The City Corporation's Lighting Strategy contributes to the City's wider aims of improving the night-time offering and creating an after-dark street experience that befits a world class business and cultural centre. Well-designed lighting schemes on commercial properties within the City can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents.
- 6.1.62. Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes can improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security. In the City, the predominance of glazed office buildings can lead to light spillage concerns for neighbouring residents with a potential impact on wellbeing. Avoidance of light spillage onto urban green spaces is crucial for biodiversity.

### How the policy works

- 6.1.63. The highlighting of key buildings, bridges and other points of interest within the City at night time is appropriate where it enhances the overall experience of this unique area, and provides orientation and wayfinding after dark.
- 6.1.64. The Illuminated River art project, to be implemented fully by 2022, will enhance the visual impact at night time through lighting of all 5 bridges located in the City. This will be complemented by a reduction in street lighting on the bridges.
- 6.1.65. The external illumination of buildings, where appropriate, should be carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design. Lighting intensity,

tone and colour need to respect the architectural form and detail of the building, be sensitive to the setting of historic buildings and limit adverse effects upon adjacent areas, uses and biodiversity.

6.1.66. There is potential for badly designed lighting schemes to generate light pollution with adverse impacts on neighbours and the natural environment, as well as incurring unnecessary costs for the occupier. The design of lighting schemes should be considered at an early stage in the development design process, having regard to the City of London Lighting Strategy. Developers should submit a Lighting Strategy with their planning application if a proposal includes the installation of external lighting or light spillage into the public realm.

6.1.67. The City Corporation will prepare further planning guidance to assist developers in the design of appropriate lighting schemes. Detailed information on requirements for lighting can be found in the City of London Lighting Strategy.

## 6.2. Vehicular Transport and Servicing

### Context

- 6.2.1. The City is served by an extensive public transport network with six mainline railway stations, 12 underground and DLR stations and an extensive network of bus routes. Transport for London identifies the whole of the City of London as having a Public transport Accessibility rating of above 6, the highest possible score. In addition, major rail termini near the City are used by large numbers of City commuters. Significant improvements are being made to public transport provision, particularly with the opening of the Elizabeth Line with two stations in the City at Farringdon and Liverpool Street/Moorgate. There are also river bus services which stop at Blackfriars Pier and at Tower Pier just outside the City.
- 6.2.2. The City has access to a very wide regional labour pool with many of its businesses drawing their workforces from destinations across London and the wider South East. The provision of safe, convenient, sustainable and effective public transport services and facilities is critical to the City's international competitiveness and its ability to continue to attract highly skilled workers. Given the unique nature of the City, with its comparatively low residential population and its dependence on inward commuting, the widely publicised '15-minute cities' concept is not directly relevant to the City's circumstances. For instance, some services for City residents are provided in adjoining boroughs through partnership working arrangements, since it may not be cost effective to deliver those services within the Square Mile. The policies in this Plan seek to facilitate ease of access to jobs and services by walking and cycling for those who are able to do so, including ensuring good connections to neighbouring boroughs.
- 6.2.3. Traffic in the City has changed significantly over the last two decades, both in terms of total volume and overall composition. Biennial traffic counts across the City show a 40% decrease in overall traffic volumes, with greater reductions for motor vehicles such as cars and light goods vehicles. The greatest observed reductions have coincided with key events such as the introduction of the Congestion Charge Zone, the global recession and the introduction of cycle superhighways. The street capacity unlocked by these reductions, alongside increases in cycling infrastructure provision, has facilitated an estimated tripling of cycling volumes across the City.
- 6.2.4. Despite traffic reductions, there are still significant challenges. Traffic counts in autumn 2017 found a slight increase in car volumes, probably caused by the increasing volumes of private hire vehicles. Freight vehicle numbers, after dropping significantly between 1999 and 2004, have levelled off in recent years. The rapid increase in cycling volumes seen in the first decade of the 21<sup>st</sup> century has not been sustained, with volumes slightly decreasing in recent years.
- 6.2.5. The demands on the City's transport network are increasing due to significant growth, fast-moving technological development and changing travel habits. In light of these factors, the City Corporation published a long-term Transport Strategy in 2019 which sets the key priorities for the City's streets and how the network is used. The Transport Strategy was developed in parallel with the drafting of the

Local Plan and the policies set out in both are aligned. Measures to support the City's Covid-19 recovery may provide an opportunity to accelerate delivery of some elements of the Transport Strategy.

6.2.6. The Mayor's Transport Strategy provides London-wide guidance, which is implemented through the City's Local Implementation Plan. Transport providers serving the City publish plans and strategies that influence investment and management decisions affecting the City's transport network.

### **Strategic Policy S9: Vehicular Transport and Servicing**

The City's transport infrastructure will be maintained and improved by:

1. Safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity, including the Northern Line/Bank Station upgrade. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused.
2. Implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term.
3. Promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations and river piers.
4. Minimising road danger and congestion, and reducing vehicle emissions by:
  - Designing and managing streets in accordance with the City of London street hierarchy;
  - Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle for shorter distances;
  - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
  - Encouraging the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points;
  - Using traffic management measures and street works permits to improve journey time reliability on the City's roads; and
  - Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, including through the use of river transport.

## Reason for the policy

6.2.7. The City's strategic central London position and its comprehensive transport infrastructure enable the vast majority of workers, residents and visitors to use public transport to access the City from across London and the wider south east. 93% of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The City is already a highly sustainable location, and the opening of the Elizabeth Line will result in a wider catchment area within an hour's journey time of the City. The City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with Transport for London to help secure improvements to public transport, for instance by safeguarding land from other forms of development where necessary.



Figure 12: Rail and underground network

6.2.8. The City's Transport Strategy indicates that the design and management of streets will reflect their position in the street hierarchy, as well as their function as places.

Movement function	Proposed category
Through traffic – the preferred streets for motor vehicles that do not start or finish their journey in, or immediately adjacent to, the Square Mile.	London Access streets (TfL network)
Local traffic – the preferred streets for motor vehicles that are travelling around the Square Mile or to locations immediately adjacent.	City Access streets
Access – used for the first or final part of a journey, providing access to properties.	Local Access streets

Table 3: City of London street hierarchy

6.2.9. The TfL network (classified as London Access) is expected to accommodate the majority of through traffic, while roads which are managed by the City Corporation are classified as either City Access or Local Access. Proposed changes to the highway network at Bank Junction, St Paul's Gyratory and Beech Street are reflected in the street hierarchy.

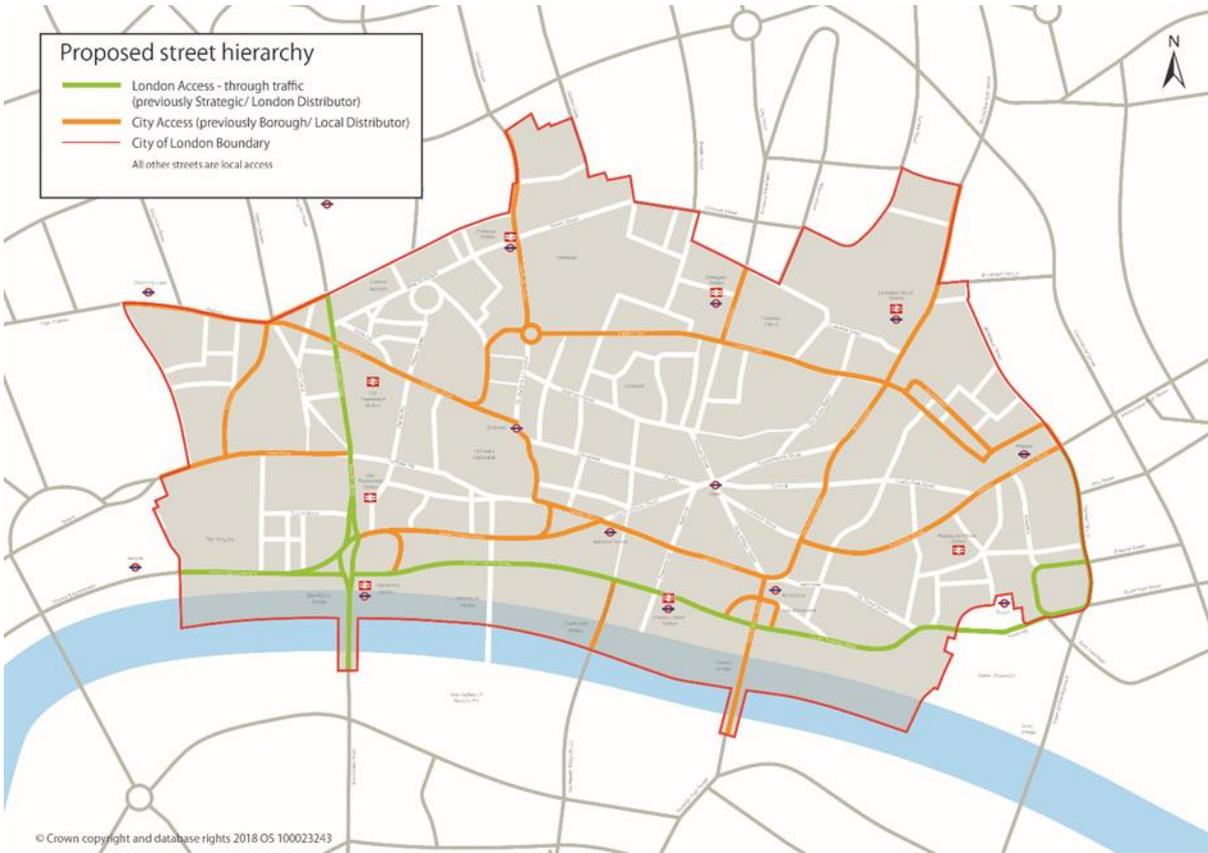


Figure 13: City of London Street Hierarchy

## How the policy works

- 6.2.10. The City's Transport Strategy aims to support the continued reduction of motor vehicle traffic on the City's streets, with targets proposed to reduce the number of motor vehicles in the City by at least 25% by 2030 and at least 50% by 2044. The spare capacity unlocked by these reductions will allow for the radical transformation of the City's streets to deliver a healthier, safer and more attractive street environment.
- 6.2.11. Achievement of the targets is dependent on measures introduced by the Mayor of London and TfL, such as the Central London Zero Emission Zone, although the City Corporation will explore specific measures within the City of London if strategic scale measures are not progressed. The City Corporation will also implement measures such as timed closures and additional traffic calming to facilitate the removal of non-essential vehicular traffic.
- 6.2.12. The City Corporation will work with TfL to review bus routing and frequency through the City to maintain or improve journey times and connectivity while enhancing the pedestrian environment.
- 6.2.13. The City Corporation will work with TfL to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step free access as part of new developments and major refurbishments.
- 6.2.14. The City Corporation will require developers and occupiers to minimise the impact of freight and servicing trips through measures such as the retiming of deliveries and collections outside peak periods, along with consolidation onto fewer or different types of vehicles.
- 6.2.15. Greater use of the River Thames will be encouraged for both passenger and freight transport purposes to alleviate the need for some motor vehicle trips on the City's streets.

### **Policy VT1: The impacts of development on transport**

1. Development proposals must have a positive impact on highway safety for all users and not have adverse effects on the City's transport networks. Where development would result in adverse impacts on the transport network, these must be mitigated through site/building design and management of operational activities. Appropriate measures will be sought via planning contributions or by legal agreement.
2. The design and implementation of traffic management and highway security measures must be agreed with the City Corporation and Transport for London, where appropriate, and may include restricting motor vehicle access and using traffic calming measures to limit the opportunity for hostile vehicle approach.
3. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) are required for all developments that exceed the following thresholds:

Land Use	Thresholds
Offices	1,000m <sup>2</sup>
Residential	10 units
Retail	1,000m <sup>2</sup>
Hotel	10 bed spaces
Health	1,000m <sup>2</sup>
Transport Infrastructure	>500 additional trips per peak hour
Mixed Use	1,000m <sup>2</sup>

4. A Construction Logistics Plans is required for all major developments or refurbishments and for any developments that would have a significant impact on the transport network during construction.

#### Reason for the policy

6.2.16. Development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Transport Assessments are required to assess the potential impacts of development, while Travel Plans will be required to maximise the use of active transport modes and public transport.

#### How the policy works

6.2.17. An assessment of the transport implications of development, during both construction and operation, should address the impacts on:

- Road danger;
- Pedestrian environment and movement;
- Cycling infrastructure provision;
- Public transport; and
- The street network.

6.2.18. Transport Assessments and Travel Plans (incorporating Cycling Promotion Plans) should be used to demonstrate adherence to the City Corporation's Transport Standards. Applicants should discuss the scope of the transport documentation required early in the pre-application stage to ensure that it provides evidence tailored to the City's specific circumstances. Account should be taken of the cumulative transport impacts of other nearby developments. TfL has prepared further guidance for developers on Transport Assessments which is available on the TfL website.

6.2.19. A full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP should comply with the measures set out in the City Corporation's Code of Practice for Deconstruction and

Construction Sites and with TfL's online guidance. The CLP should show examples of how vehicles will be managed in line with the need to Reduce, Re-time and Re-mode (the three Rs).

- 6.2.20. Development will be subject to conditions, Section 106 and Section 278 Agreements to ensure appropriate mitigation of any adverse transport impacts. Community Infrastructure Levy contributions will be used by the City Corporation to deliver wider improvements to the transport network, where appropriate.

### **Policy VT2: Freight and Servicing**

1. Applicants should consult with the City Corporation on matters relating to servicing at an early design concept stage. Development should be designed to provide for on-site servicing, wherever practicable.
2. Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation. New technologies will be encouraged to enable efficient servicing and deliveries to sites.
3. On site servicing areas must be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Servicing areas must be equipped with electric vehicle fast charging points.
4. Delivery to and servicing of development must take place outside peak hours (i.e. avoiding deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays). Deliveries should be made in the late evening or at weekends outside of residential areas. Areas of high footfall may be subject to further restrictions.
5. Developers should consider ways to reduce congestion caused by servicing and deliveries, such as implementing last mile deliveries by foot, cycle or zero emission vehicle, and should justify where such measures are not possible. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate.
6. Provision should be made within buildings for shredding operations.

#### Reason for the policy

- 6.2.21. The low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City's traffic moving and thereby avoid air pollution caused by stationary traffic. The Mayor's Transport Strategy aims to reduce the number of lorries and vans entering central London in the morning peak by 10% by 2026. The City's Transport Strategy seeks to reduce the number of motorised freight vehicles by 15% by 2030 and 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles. The City Corporation is working with local employers to support

them in freight consolidation and to share best practice and ideas, for example through the Cheapside Business Alliance and the Active City Network.

- 6.2.22. Retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. The City Corporation's Transport Strategy aims to reduce the number of motorised freight vehicles at peak times (7-10am, 12-2pm and 4-7pm) by 50% by 2030 and 90% by 2044. The use of different forms of consolidation, including 'virtual' as well as physical consolidation, will be required to minimise the number of trips required to service a development during construction and operation. Virtual consolidation involves techniques such as preferred suppliers or nominated carriers to serve a multi-tenanted building. Opportunities to trial and support freight innovation through new technology will be explored as part of the City Corporation's Future City Streets programme.
- 6.2.23. Large physical consolidation centres will almost always need to be located outside the City because of the lack of suitable land and high land values within the City and will therefore require the cooperation of other local authorities. The City Corporation's Transport Strategy outlines the Corporation's intention to work with a partner haulier to provide a consolidation service for the City of London by 2022 and to establish a sustainable logistics centre to serve the Square Mile by 2030. This centre would co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriering services. It would be supported by last mile logistics hubs within the City to facilitate more deliveries on foot, by bike and by small electric vehicles.
- 6.2.24. Personal deliveries to places of work within the City contribute to congestion on the streets. Businesses should discourage personal deliveries to business premises and instead encourage deliveries near home and use of click and collect parcel drop off services. It may be appropriate to secure this through a legal agreement. Where deliveries continue to take place, the provision of shared ground floor storage facilities in multi-tenanted buildings may reduce the amount of time spent at the kerbside by delivery vehicles. To reduce emissions from delivery vehicles, electric vehicle charging points will be required within service areas for freight vehicles.
- 6.2.25. On-street shredding operations associated with building occupation creates noise and congestion on street and can have an adverse impact on the amenity of neighbouring uses.

#### How the policy works

- 6.2.26. Servicing areas should be designed into new buildings and provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom should be provided of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas.
- 6.2.27. Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational

deliveries and servicing. For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. Where consolidation of servicing and deliveries is proposed, the number of vehicle trips that have been avoided as a result should be set out in the DSP. Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP. Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries. The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. The City Corporation will work with developers and occupiers to monitor the actual reductions in deliveries achieved through consolidation.

6.2.28. Out of hours servicing is required, except in residential areas where night-time deliveries should be avoided, and further restrictions may be applied in areas of high footfall. The DSP should set out that a booking system for deliveries and servicing will be implemented, and that deliveries and servicing within the restricted hours of 7am-10am, 12pm-2pm and 4pm-7pm on weekdays will not be permitted. High footfall in areas at other peak times may also require restrictions on deliveries and servicing.

6.2.29. Where deliveries are required outside of the restricted hours, these should be subject to a quiet delivery agreement or a commitment to minimise noise and pollution impacts in all stages of the delivery process. Details should be set out in the DSP. Where appropriate, construction deliveries may be accepted outside of normal working hours and the management of such deliveries should be explained in the DSP.

6.2.30. Provision should be made within off-street, in-building, servicing bays for shredding operations to reduce the potential for disturbance to neighbours. On-street shredding will not be permitted.

6.2.31. Further information is set out in the City of London's Freight and Servicing SPD.

### **Policy VT3: Vehicle Parking**

1. Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.
2. No new public car parks will be permitted, including through the temporary use of vacant sites.
3. Underutilised public car parks will be prioritised as sites for last mile delivery hubs and other alternative uses that support the delivery of the Transport Strategy. The

redevelopment of existing public car parks for other land uses will be supported if it is demonstrated that they are no longer needed for a transport-related function.

4. All off-street car parking facilities must be equipped with electric vehicle charging points.
5. New taxi ranks will only be permitted in key locations such as near stations, hotels and large retail developments and where they do not conflict with other policies in the development plan. Off-street taxi ranks should be designed with a combined entry and exit point to minimise obstruction to other transport modes.

#### Reason for the policy

6.2.32. The City has excellent public transport accessibility and all development should therefore be car-free, unless it can be demonstrated that there are exceptional circumstances which justify limited car parking.

#### How the policy works

- 6.2.33. Designated parking must be provided for Blue Badge holders within developments in conformity with the London Plan requirements and must be marked out and reserved for their use. Some older or disabled residents may need regular visits from carers and healthcare professionals and the provision of visitor parking would support their ability to live in their own homes. Any such parking should be marked out as such and restricted only for these users.
- 6.2.34. The City's public car parks were mostly constructed during the 1960s. Some are now underused, and the City Corporation is actively developing proposals to establish last mile delivery hubs within those car parks. Other transport-related infrastructure may be suitable in under-utilised car parks.
- 6.2.35. Evidence will be required to demonstrate that a car park is no longer required for a transport-related purpose if conversion or redevelopment to an alternative land use is proposed.

#### **Policy VT4: River Transport**

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore and other river-based transport infrastructure to enable an increase in passenger and freight transport by river. The City Corporation will seek the reinstatement of Swan Lane Pier and development which prejudices this reinstatement will not be permitted.
2. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site.
3. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.

### Reason for the policy

- 6.2.36. Walbrook Wharf is the only active river wharf in the City and will be retained as a waste facility and river wharf in line with the London Plan and the Mayor's Safeguarded Wharves Direction. The waste transfer site at Walbrook Wharf provides a means of removing domestic and commercial waste from the City by river, significantly reducing the need for road transport of waste. Subject to the need to retain capacity for efficient waste operations from this site, there may be potential to use Walbrook Wharf for freight logistics.
- 6.2.37. Additional use of the river either to transport construction and demolition materials or for deliveries and servicing would further reduce the need for goods vehicles on the City's streets, helping to alleviate congestion and pollution.
- 6.2.38. Swan Lane Pier is a redundant pier and the City Corporation will seek its reinstatement. Applicants should liaise with the Port of London Authority regarding the operational and safety aspects of their proposals and with the Environment Agency regarding the impact of boat movements on biodiversity and river defences.
- 6.2.39. The City Corporation will require developments adjacent to, on, or over the river, to consider the use of the river for freight and servicing and for the transport of construction and waste materials.

### **Policy VT5: Aviation Landing Facilities**

Heliports will not be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

### Reason for the policy

- 6.2.40. Heliports are not appropriate in the City because of the noise and disturbance that would be created by helicopters in such a densely developed area. In order to demonstrate a need for helipad facilities, it must be certified by the emergency services and shown that the need cannot be met elsewhere. The City Corporation's Transport Strategy sets out principles that will apply to the potential use of drones in the City. The City Corporation will keep the need for facilities for drones under review, taking account of developing technology, the impact on amenity, City streets and sky space, and the security and privacy implications.

## 6.3. Active Travel and Healthy Streets

### Context

6.3.1. The Mayor of London, through his Transport Strategy, aims to significantly change the function of London's streets to reduce the dominance and negative impacts of motor traffic and enable walking, cycling and social interaction. The Healthy Streets Approach provides the framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. These include ensuring people feel safe and creating street environments that enable people to choose walking, cycling and public transport instead of using the car. Good performance against each indicator demonstrates that individual streets are appealing places to walk, cycle and spend time.



Figure 14: Mayor's Transport Strategy Healthy Streets Indicators (Source: Lucy Saunders)

6.3.2. The City's workforce is expected to increase significantly over the course of the Plan period to 2036, albeit that increased remote working means that actual footfall is unlikely to rise in proportion to total employment. Visitor numbers are also anticipated to rise. This will result in significant and increasing pressure on the pavements and the public realm at peak times in the morning, lunchtime and early

evening. Figure-15 illustrates forecast pedestrian flows across the City in 2026 during the am peak. This forecast was produced before the Covid-19 pandemic and it is uncertain to what extent the pandemic may affect medium and longer term pedestrian movement in the City. The pandemic has, however, emphasised the importance of facilitating safe and convenient public transport services into and out of the City together with measures to ensure active travel and pedestrian comfort within the City's boundaries.

**2026 Baseline scenario Morning peak (07:00 – 10:00)**

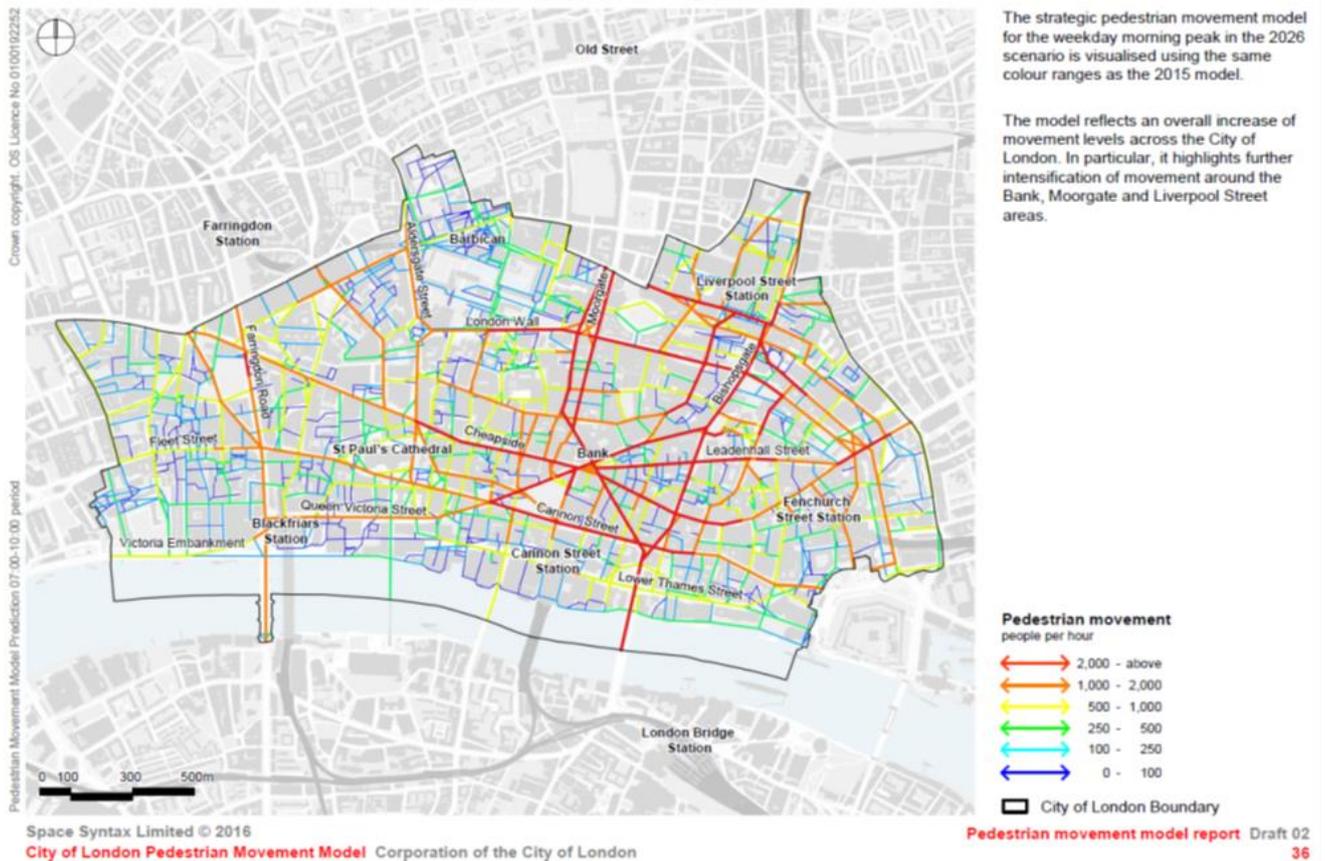


Figure 15: Forecast pedestrian flows in the City of London in the am peak in 2026

**Strategic Policy S10: Active Travel and Healthy Streets**

The City Corporation will work with partners to improve the quality and permeability of the City's streets and spaces to prioritise walking and cycling, improve accessibility and encourage more active modes of travel to, from and within the City by:

- Improving conditions for safe, convenient, comfortable and accessible walking and cycling, incorporating climate change adaptation;
- Expanding the cycle network across the City with the aim of ensuring that nearly all property entrances are within 250m of the network;
- Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City's Transport Strategy;

- Improving access routes and the public realm around stations, and between stations and key destinations; and
- Implementing enhancements to the safety and appearance of streets and public realm in conjunction with restrictions to vehicular access, taking account of the needs of people with disabilities.

### Reason for the policy

6.3.3. Most movement in the City is on foot and the street environment is predominantly a pedestrian environment, with over 750,000 walked journeys a day. Cycling in the City needs to be considered within this context. Cycling in the City increased by almost 300% between 1999 and 2017, although the rate of growth has slowed markedly since 2012. People cycling now make up a quarter of vehicles and this figure can rise to over 50% on major streets during peak periods. Pedestrian numbers have also risen in recent years as the City's workforce has grown. Over 400,000 pedestrians were counted on the City's streets during a survey in November 2017.

6.3.4. Improvements to conditions for safe, convenient and comfortable walking and cycling are required to improve the experience of people who already walk and cycle and encourage more people to use active modes of travel. Provision of necessary infrastructure is particularly challenging due to the City's historic street pattern and the significant demands for space on streets from the high volume of pedestrians, cyclists and servicing and other essential vehicles.

6.3.5. The Mayor's Transport Strategy seeks to enable more people to walk and cycle and reduce the use of and reliance on cars. Prioritisation of walking and cycling through reallocation of highway space is advocated where appropriate to reduce conflict between different modes of transport, and to create an environment where people choose to walk and cycle.

### How the policy works

6.3.6. Through the City Corporation's Transport Strategy, the design and management of streets will reflect their position in the street hierarchy, as well as their function as places. Traffic management measures to implement the street hierarchy will be identified through the development of area based Healthy Streets Plans. These will consider how to reduce the use of Local Access streets by through traffic, while maintaining access. They will also consider opportunities to introduce pedestrian priority, improve the experience of cycling and walking, enhance the public realm and create new public space.

6.3.7. Planning applications will be assessed against the Healthy Streets Indicators and developers will be required to use the Healthy Streets Check for Designers for all developments that have a significant impact on surrounding streets.

6.3.8. The first four Healthy Streets Plans, to be developed by 2022, will cover the following areas:

- Barbican and Smithfield: supporting the delivery of the Culture Mile Look and Feel Strategy and the new Museum of London. The area covered will align with the Smithfield and Barbican Key Area of Change.
- Bank and Guildhall: incorporating the transformation of Bank Junction and supporting changes to the Museum of London roundabout and St Paul's Gyratory.
- City Cluster and Fenchurch Street: responding to the growth of the City Cluster and the proposed upgrade of Fenchurch Street station and enabling the delivery of the City Cluster Area Strategy. This will align with the City Cluster Key Area of Change and incorporate part of the Aldgate, Tower and Portsoken Key Area of Change.
- Temple and Fleet Street: in response to the Fleet Street Estate Project, which comprises the new Magistrates court and City of London Police headquarters, and enhancement of Fleet Street and the Temples area.

6.3.9. An experimental safety scheme was introduced at Bank Junction in May 2017, which restricted traffic to buses and cycles only on weekdays between 7am and 7pm. Monitoring shows that this scheme achieved a significant reduction in casualties at the junction, while also reducing NO<sub>2</sub> emissions in the area. Traffic restrictions at the junction have now been made permanent and a wider series of highways and public realm enhancements, known as All Change at Bank, will be implemented during the Plan period to transform the look and feel of this key junction at the heart of the City.

6.3.10. Adaptation to the anticipated climate change in the City should include pollution reduction and mitigation. The Healthy Streets Approach, the City's Transport Strategy and the City Corporation's Air Quality Strategy seek to deliver improvements in air quality and reductions in emissions and noise from transport. The City Corporation is working with partners to ensure that the City's streets and the public transport system are resilient to the long-term impacts of severe weather and climate change.

### **Policy AT1: Pedestrian Movement**

1. Developers should facilitate pedestrian movement and reduce severance by provision of suitable routes through and around new developments. The City Corporation will work with developers and owners to maintain pedestrian routes at ground level and the upper level walkway network around the Barbican and London Wall.
2. Development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians using them.
3. The loss of a pedestrian route will only be permitted where an alternative public pedestrian route of at least equivalent standard is provided having regard to:
  - The extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;

- The shortest practicable routes between relevant points.
4. Routes of historic importance will be safeguarded and where appropriate reinstated as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
  5. The replacement of a route over which pedestrians have rights with one to which the public have access only with permission will not be acceptable.
  6. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary, and it is clear to the public that access is allowed.
  7. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant.

#### Reason for this policy

- 6.3.11. In light of the current and predicted demands on the City's streets and public realm, permeability and legibility are vital in order to accommodate pedestrians and enable efficient movement of people on foot and by cycle. Redevelopment schemes may provide opportunities to improve pedestrian safety and comfort, for instance by creating new routes or areas of open space, widening pavements and removing pinch points, or securing enhanced public access to private spaces and routes. Policy DE4 sets out requirements for improved pedestrian permeability through buildings and development sites.
- 6.3.12. The City Corporation's Transport Strategy promotes strategic measures to facilitate improved pedestrian movement, including pedestrian priority streets, increasing the number of pedestrianised or pedestrian priority streets from 25km to 35km by 2030 and with an initial focus on the City Cluster and Culture Mile. Opportunities will also be identified to introduce pedestrian priority on streets with a pavement width of less than two metres.
- 6.3.13. The Transport Strategy identifies certain routes and junctions which will be prioritised for improvement, focusing on those which are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 (see Figure 16):
- The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank Junction.
  - Bank Junction and streets between the junction and the City Cluster.
  - The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory.

- The route between the Barbican and the new Museum of London, including Beech Street and Long Lane (the ‘Culture Spine’).
- Fleet Street, including potential changes to Ludgate Circus (in partnership with TfL).
- The Bishopsgate corridor, including Monument junction (in partnership with TfL).
- The Globe View section of the Riverside Walkway.

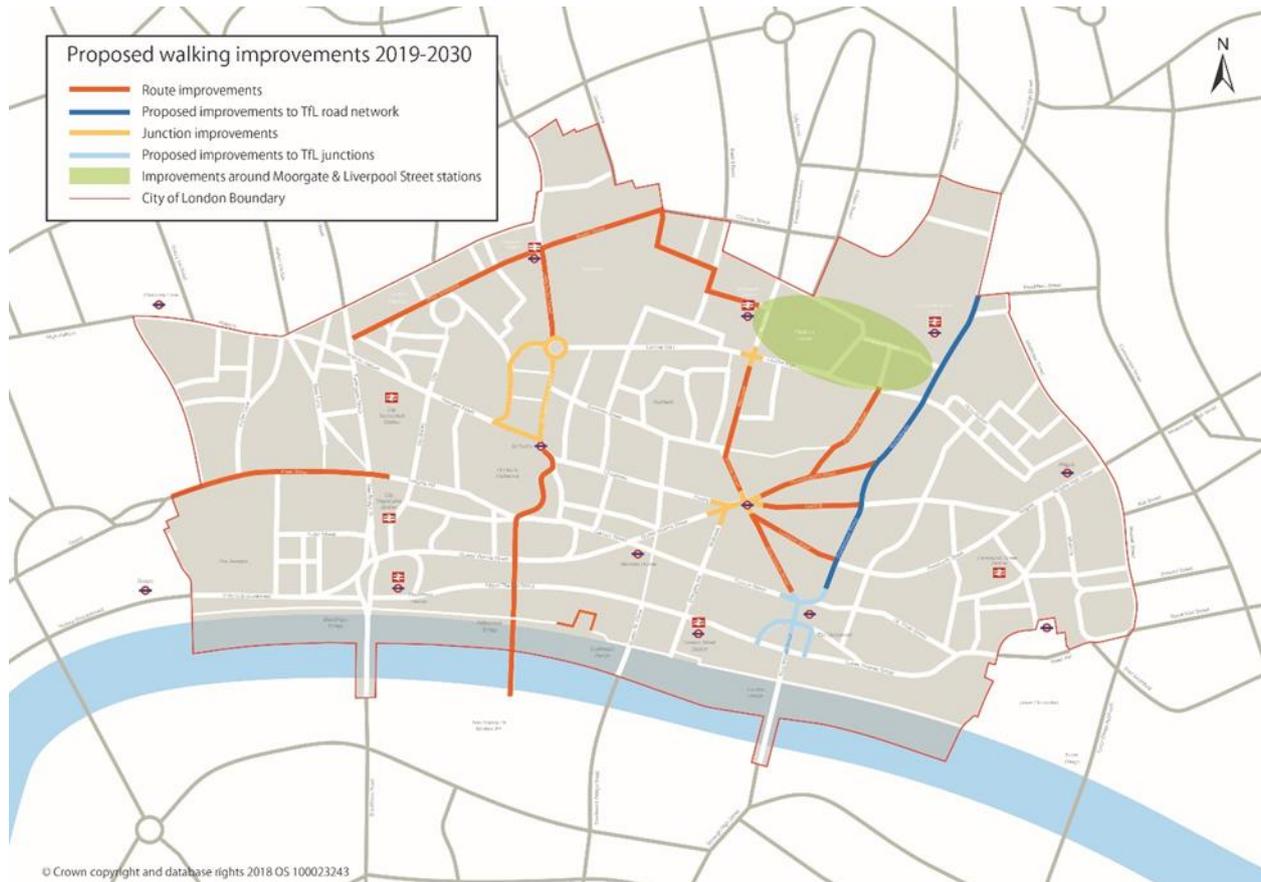


Figure 16: Proposed walking improvements 2019-2030

6.3.14. The City’s narrow streets and alleyways pose additional opportunities and challenges in terms of accessibility, wayfinding and safety. Many of these are valuable amenity spaces and are of historic importance. Sensitive solutions will be sought where development would have an impact on these spaces to protect their setting and create high quality, accessible areas for all the City’s users.

#### How the policy works

6.3.15. In considering proposals for new pedestrian routes, the City Corporation will ensure that routes are of adequate width, step-free and follow best practice in street design. Developers will be expected to consider the cumulative impacts of their developments on City streets alongside other existing and permitted

development. Further details are set out in the City Public Realm SPD and accompanying Technical Manual.

6.3.16. Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. TfL's Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City Corporation's Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve a B+ rating.

6.3.17. Appropriate management and maintenance arrangements for the public realm and pedestrian routes should be agreed, including for public space that is privately owned (in accordance with the Mayor of London's Public London Charter) and secured through legal agreement or planning condition.

6.3.18. Where new pedestrian routes are created, or existing routes improved, the City Corporation will work with organisations such as the Active City Network and the Cheapside Business Alliance to provide information about routes to City workers, residents and visitors.

### **Policy AT2: Active Travel including Cycling**

All major development must promote and encourage active travel through making appropriate provision for people who walk, cycle and travel actively, by:

- ensuring suitable access between the development site and pedestrian and cycle routes;
- incorporating sufficient shower and changing facilities, and lockers/storage to support walking and cycling.

#### Reason for this policy

6.3.19. Most of the City's employees journey into work via public transport, completing their journeys on foot. Pedestrians make up the majority of the road users in the City and as such, provision needs to be made to facilitate safe and pleasant pedestrian movements and active travel.

6.3.20. A growing number of people are choosing to cycle through and around the Square Mile. Increased access to the East-West and North-South Cycle Superhighways enables cyclists to cross the City on safer strategic routes. This will be supplemented by a Citywide core cycle network providing safe and attractive routes around the Square Mile and linking into cycling networks in neighbouring boroughs (see Figure 17). Cycling improvements and interventions will be prioritised on this network, with the aim of delivering the core cycling network by 2035.

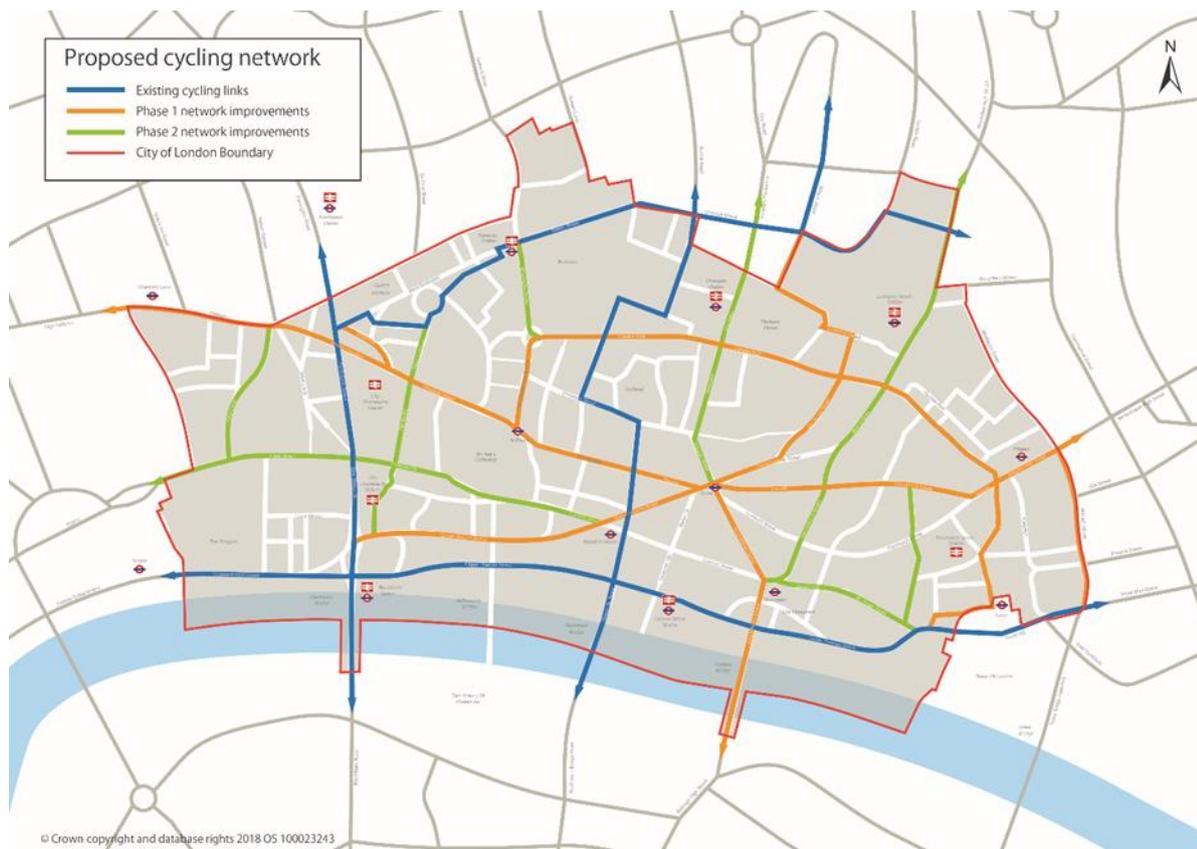


Figure 17: Proposed core cycling network and phasing

6.3.21. Smaller measures and network enhancements will be identified through development of the Healthy Streets Plans and a review of existing Quietways, which run along less heavily trafficked back streets. Additional cycling infrastructure should see an increase in the uptake of cycling as a way of travelling around as well as commuting into the City and help to achieve the aims of both City of London’s Transport Strategy, and that of the Mayor of London.

#### How the policy works

6.3.22. New developments should provide shower and storage/locker facilities to encourage employees to engage in active travel modes. Lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space. Showers should be provided at a minimum of 1 shower per 10 cycle parking spaces. The City of London’s Active City Network actively encourages employers to promote and support safer commuting. The provision of personalised travel planning by employers for their staff can be an effective way of helping to achieve this.

6.3.23. Developers will be required to contribute towards the enhancement of the public realm to encourage pedestrian and cycle travel, and towards the expansion of the City’s cycle network if the development is likely to benefit from the provision of a nearby route. Contributions may be secured through s106 planning obligations and s278 highways agreements where such provision is necessary to mitigate the impacts of the development.

### **Policy AT3: Cycle Parking**

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, and will be encouraged to provide facilities for public cycle parking.
2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.

#### Reason for this policy

6.3.24. There is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, reduce carbon emissions and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs.

#### How the policy works

6.3.25. Developers will be required to provide sufficient cycle parking to meet potential demand, including provision for non-standard cycles. A robust justification for failure to comply with London Plan standards will be required. This will be considered on a case by case basis as part of pre-application discussions. All on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with London Cycling Design Standards.

6.3.26. Short-stay visitor cycle parking should be provided on-site at ground floor level. Visitor cycle parking should be near building entrances in publicly accessible spaces wherever possible. Exceptionally, if this is not possible because of the layout and configuration of the site, 25% additional long stay cycle parking must be provided.

6.3.27. In order to facilitate last-mile deliveries by sustainable modes of travel, premises that include retail and take-away food outlets will be encouraged to provide storage space for cargo bikes and hand carts.

6.3.28. The Mayor's Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people.

6.3.29. This policy applies to the cycle parking provided within new developments. The City Corporation's Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. The City Corporation will publish a Cycle Parking Delivery Plan, which will review the availability and distribution of public cycle parking on and off-street to ensure it is sufficient to meet forecast demand.

## 6.4. Historic Environment

### Context

6.4.1. The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, workers, residents and visitors.

6.4.2. There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17<sup>th</sup> century home on Cloth Fair to Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects, such as the Barbican Estate and the Lloyds Building. As well as listed buildings there are 27 conservation areas, 48 Scheduled Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides part of the backdrop and setting for the Tower of London World Heritage Site.

### Strategic Policy S11: Historic Environment

The City's heritage assets, their significance and settings will be positively managed, by:

1. Conserving and enhancing heritage assets and their settings to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing;
2. Encouraging the beneficial, continued use of heritage assets consistent with their conservation and enhancement, including those on the Heritage at Risk Register;
3. Seeking improved public access, and enhanced experience and interpretation of the City's cultural and heritage assets;
4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations; and
5. Preserving and seeking to enhance the Outstanding Universal Value (OUV),<sup>1</sup> architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.



Figure 18: Designated heritage assets in the City of London

### Reason for the policy

6.4.3. The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.

6.4.4. The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.

6.4.5. The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of the City's listed buildings have a commercial use, including offices, retail, and hotels and provide vital small and medium-sized office space. The City has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, Bevis Marks Synagogue and an equally unique collection of over 60 churchyards embedded within a dense townscape.

6.4.6. Heritage assets can significantly contribute to London's economy, providing valuable office space suitable for small to medium-sized occupants as well as creative industries, and providing potential space for hotels and retail uses. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to, and experience of, the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

#### How the policy works

6.4.7. The policy enables adaptations to be made to heritage assets where the alterations are consistent with the conservation and significance of those assets. The sensitive adaptation of heritage assets contributes to the continual growth of the City's economy. This and continued investment will ensure that buildings retain an active use so that the City's buildings and heritage can be appreciated by present and future generations.

6.4.8. The City Corporation will encourage proposals to achieve the conservation and appropriate use of buildings and monuments on the Heritage at Risk Register to ensure their repair, long term well-being and where possible, avoid future deterioration.

6.4.9. In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage Site of Outstanding Universal Value (OUV).

#### **Policy HE1: Managing Change to Heritage Assets**

Development proposals which affect heritage assets or their settings should be supported by a Heritage Assessment, to evaluate the significance of relevant heritage assets and their settings, to inform the proposals and maximise enhancements. Proposals should meet the following criteria:

1. Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings.
2. Development in conservation areas should preserve or enhance the character or appearance of the conservation area. The loss of buildings and elements which contribute to the character, appearance or significance of a conservation area will be resisted;
3. Development should not adversely affect Historic Parks and Gardens included on the Historic England Register and historic open spaces;
4. The demolition or loss of designated heritage assets will be refused, having regard to the tests set out in national policy.
5. Where proposals would result in harm to, or the loss of, a non-designated heritage asset, the City Corporation will have regard to the scale of any harm or loss, the significance of the heritage asset and the wider public benefits proposed.

6. Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought.

Reason for the policy

6.4.10. It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset.

6.4.11. National policy applies different tests to development proposals that would result in substantial harm to (or total loss of) the significance of a designated heritage asset and proposals that would cause less than substantial harm. Where the harm is less than substantial it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. National policy indicates that great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

6.4.12. Where a development proposal would affect a non-designated heritage asset, national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as appropriate and be based on a clear understanding of the building, structure, open space or archaeological remains, including group value.

6.4.13. The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.

6.4.14. In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.

6.4.15. Many buildings in conservation areas, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.

- 6.4.16. Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.
- 6.4.17. Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building does not harm its significance. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.
- 6.4.18. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations is a material consideration.
- 6.4.19. Development proposals that affect the City's historic parks and gardens will be assessed to ensure that overshadowing does not cause undue harm, that their historic character is maintained, and that the setting, enjoyment, and views into and from these gardens are respected. Development should not detract from the layout, design, character, appearance or setting of the park or garden or prejudice its future restoration.
- 6.4.20. The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have been lost to the detriment of the City's historic townscape. Where possible, the City Corporation will seek to re-open or reintroduce such routes when the opportunity arises.

#### How the policy works

- 6.4.21. Developers will be required to provide supporting information describing the significance of any heritage assets where fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets.

## **Policy HE2: Ancient Monuments and Archaeology**

1. Development proposals which involve excavation or ground works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities.
2. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, inclusive access to, public display and interpretation where appropriate.
3. Proper investigation and recording of archaeological remains will be required as an integral part of a development programme, together with timely publication and archiving of results to advance understanding.

### Reason for the policy

6.4.22. The entire City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.

### How the policy works

6.4.23. Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and to inform consideration of the development proposals by the City Corporation.

6.4.24. In some cases, a development may reveal a monument or archaeological remains which will be displayed on the site, or reburied. On sites where significant monuments or archaeological remains exist, development must be designed to enhance physical preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future. Undesignated archaeological remains equivalent to a scheduled monument will be given equal weight to designated heritage assets.

6.4.25. The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of development proposals. Agreement will be sought, where appropriate, to achieve public access. The City Corporation will refuse schemes which do not provide an adequate assessment of a site, make any provision for the incorporation, safeguarding or preservation of significant monuments or remains, or which would harm or adversely affect those monuments or remains. Where display of a monument or of archaeological remains would harm the heritage asset or make it vulnerable and reburial is

necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.

6.4.26. A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be conditioned and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

### **Policy HE3: Setting of the Tower of London World Heritage Site**

1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and connectivity.

#### Reason for the policy

6.4.27. The Tower of London is a UNESCO World Heritage Site of Outstanding Universal Value. While the Tower itself is within the London Borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to safety and accessibility for non-motorised road users. Developments within a wider area may affect the setting of the Tower, depending on their scale, form and location.

#### How the policy works

- 6.4.28. Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.
- 6.4.29. The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its OUV, while accommodating change. The International Council on

Monuments and Sites (ICOMOS) publication 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties' offers guidance on the process of commissioning Heritage Impact Assessments (HIAs) for World Heritage properties, in order to evaluate the impact of potential development on the OUV of properties.

## 6.5. Tall Buildings and Protected Views

### Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD)
2. Tall buildings of world class architecture and sustainable and accessible design will be encouraged on suitable sites, having regard to:
  - the potential effect on the City skyline, the wider London skyline and historic skyline features;
  - the character and amenity of their surroundings, including the relationship with existing tall buildings;
  - the impact on the significance of heritage assets and their immediate and wider settings;
  - the provision of a high-quality public realm at street level; and
  - the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.
3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.
4. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities within the building and its curtilage, including at upper levels, available at no charge.
5. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.
6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.

#### Reason for the policy

- 6.5.1. The City contains many tall buildings, which help to enhance its environment and economy and contribute to London's world city role. While tall buildings are a characteristic and iconic element of the City's skyline, they must not adversely impact on the City's unique environment or built heritage. All of the City is sensitive

to the development of tall buildings within and outside the City. Areas outside of the City may also be sensitive to the development of tall buildings within the City. The location and impact of future tall buildings therefore needs to be carefully considered. Policy HE3 sets out criteria for development proposals affecting the setting of the Tower of London World Heritage Site.

6.5.2. Tall buildings are defined as those exceeding 75m AOD in height. Figure 19: Tall buildings distribution in the City of London September 2019 shows their current distribution. The City Corporation is required to refer applications to the Mayor for buildings that exceed 150m above ground height across the City and 25m above ground height in the Thames Policy Area. The intention of this lower threshold is to preserve the open aspect of the river and the riverside public realm. Tall buildings in the City may have impacts on locations within adjacent boroughs. Developers should ensure that any cross-boundary impacts are fully addressed.

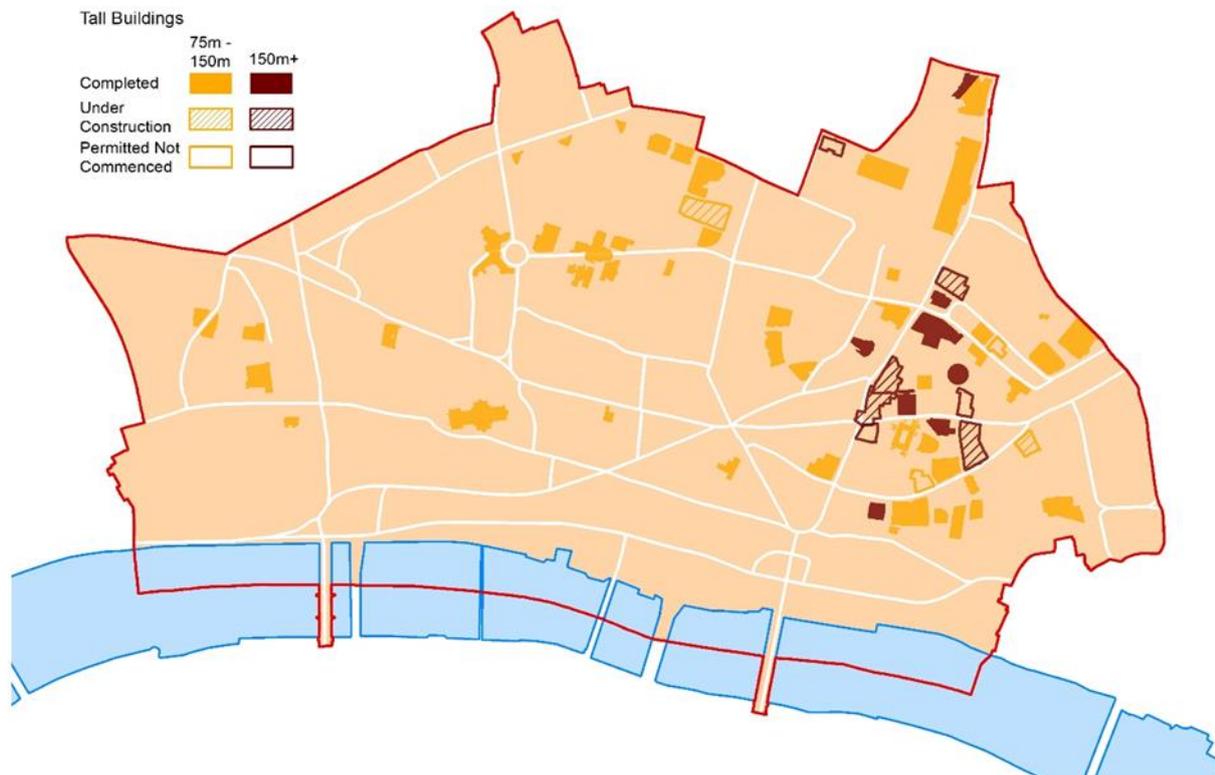


Figure 19: Tall buildings distribution in the City of London September 2019

6.5.3. Guidance issued by the Design Council/CABE and Historic England encourages local planning authorities to consider the scope for tall buildings as part of strategic planning and to identify locations where they are, or are not, appropriate. The London Plan indicates that areas should be identified where new tall buildings will be an appropriate form of development in principle.

6.5.4. All of the City of London is sensitive to development of tall buildings and the City Cluster represents the most appropriate area for encouraging tall buildings in the City. This does not mean that all sites within the cluster are suitable. All new tall

building proposals will need to satisfy the requirements of Policy S12 and other policies in this Plan and the London Plan. Policy S21 provides more details about the considerations that apply specifically to new tall building proposals in the City Cluster.

6.5.5. Outside of the City Cluster, there is less scope for new tall buildings due principally to conservation area and views protection considerations. Figure 21: Areas inappropriate for new tall buildings 21 identifies those areas of the City that are considered inappropriate for new tall buildings due to these policies, based on a composite of the various policy designations illustrated in Figure 20.

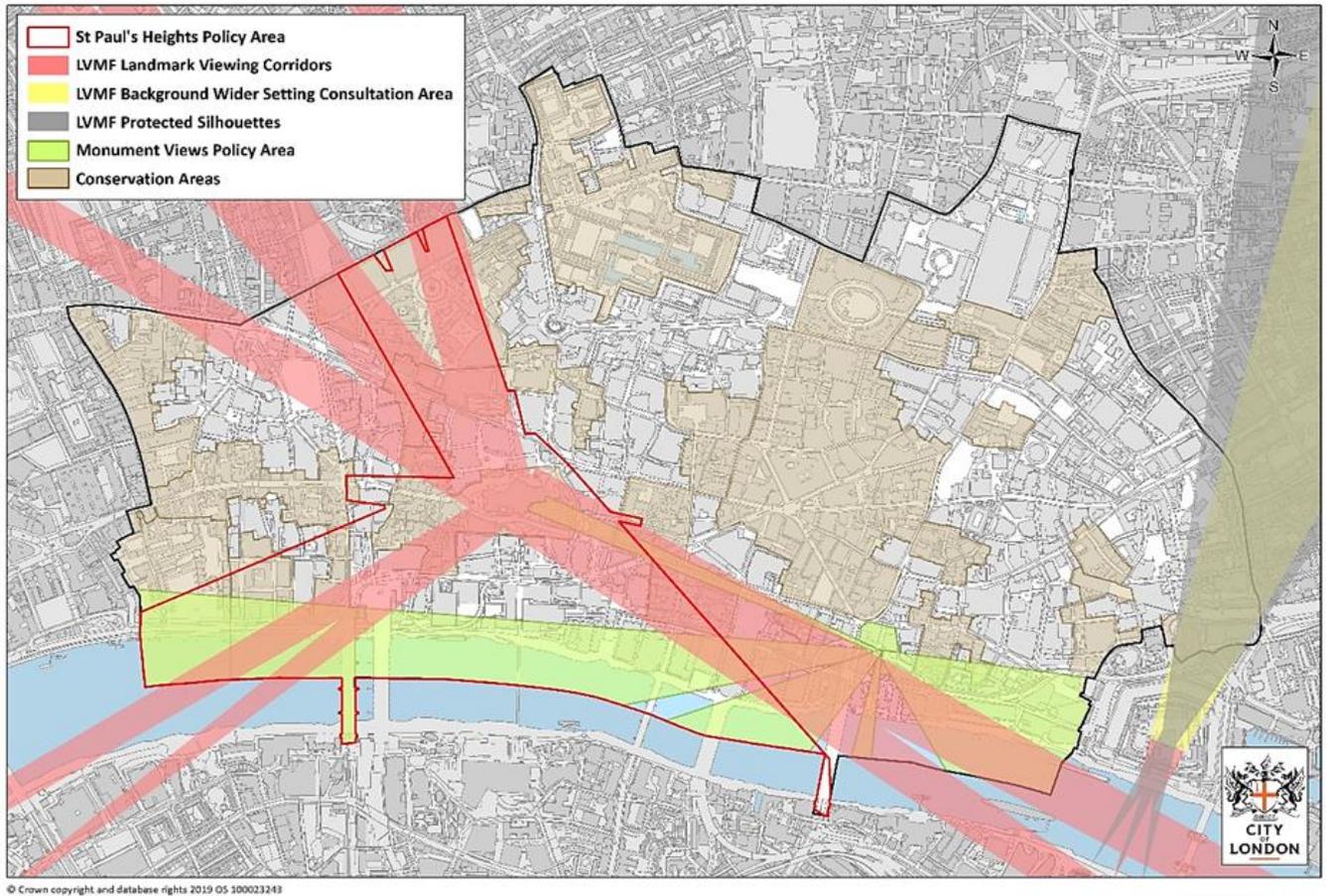


Figure 20: Components of areas inappropriate for new tall buildings

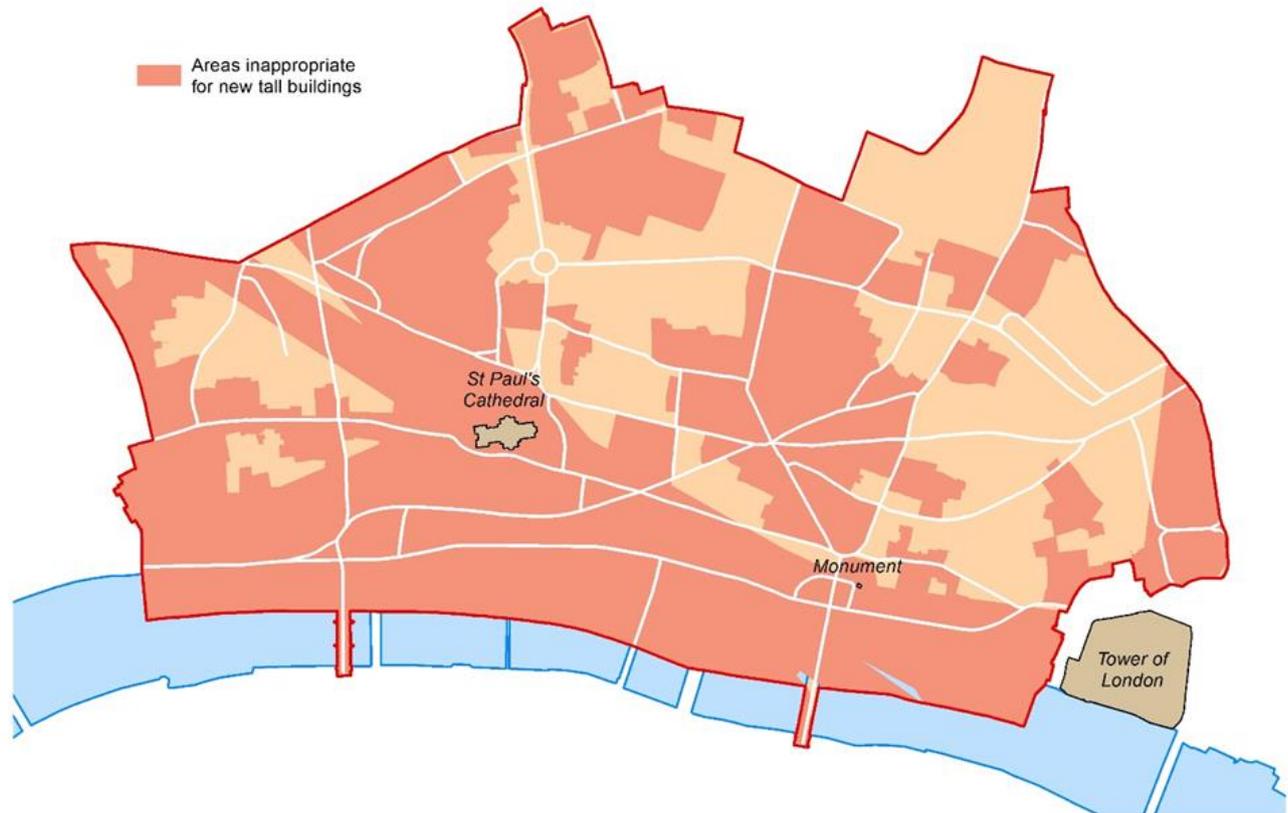


Figure 21: Areas inappropriate for new tall buildings

How the policy works

6.5.6. Tall buildings are high-profile developments with a wider impact, visible on the skyline across large parts of London. They provide City landmarks and should be designed to enhance the City’s skyline.

6.5.7. Tall buildings must not adversely impact on the operation of London’s airports, taking account of airport surface limitation heights. Consultation with London City Airport will be required on all proposals over 90m AOD and with Heathrow Ltd on all proposals over 150m AOD. Subject to this consultation, the maximum height of buildings, any equipment used during the construction process and any subsequent maintenance or demolition must not exceed the Civil Aviation Authority’s (CAA’s) aviation safeguarding policy for central London, which sets a maximum height limitation of 309.6m (1,016 ft) AOD. Developers should undertake early liaison with the CAA, Heathrow and London City Airports regarding building heights and the height of cranes or other equipment to be used during construction, subsequent operation or demolition.

6.5.8. The development of tall buildings must take account of City Corporation Planning Advice Notes on the potential microclimate and thermal comfort impacts from development at an early stage in the design process. Planning Advice Notes set out requirements for assessing the impacts of tall buildings on solar glare, solar

convergence, sunlight, wind and thermal comfort explaining how they should be considered as part of the design process. Tall buildings should not interfere with telecommunications during construction and operation. Developers will be required to submit a Telecommunications Interference Survey identifying the impact of the development and any proposed mitigation measures.

6.5.9. Proposals for new tall buildings should take account of the cumulative impact of other proposed, permitted and existing tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, maintain and enhance pedestrian permeability and deliver consolidation of servicing and deliveries to reduce potential vehicle movements.

6.5.10. Tall buildings must provide for the amenity of occupiers, visitors to the building and the wider public. They should contain permeable ground floors which provide an active frontage, such as retail facilities. Tall buildings should provide free to enter, publicly accessible areas, which may include retail, leisure or educational facilities or areas of open space including roof gardens or public viewing galleries. There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London.

6.5.11. The City Corporation will use 3D digital modelling technology to visually assess the impact of tall buildings on the local, City-wide and London-wide townscape and skyline. This assessment will support detailed consideration of development proposals against the policies in this Plan. Developers should submit virtual models of their development in an open source or other format compatible with the City Corporation's 3D digital model to enable this assessment.

### **Strategic Policy S13: Protected Views**

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views;
- Protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features; and
- Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).

## Reason for the policy

6.5.12. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.

6.5.13. The approach to views protection in this Plan is a clarification of the long-standing policy, rather than seeking changes to policy. It is supported by more detailed guidance in the Protected Views SPD.

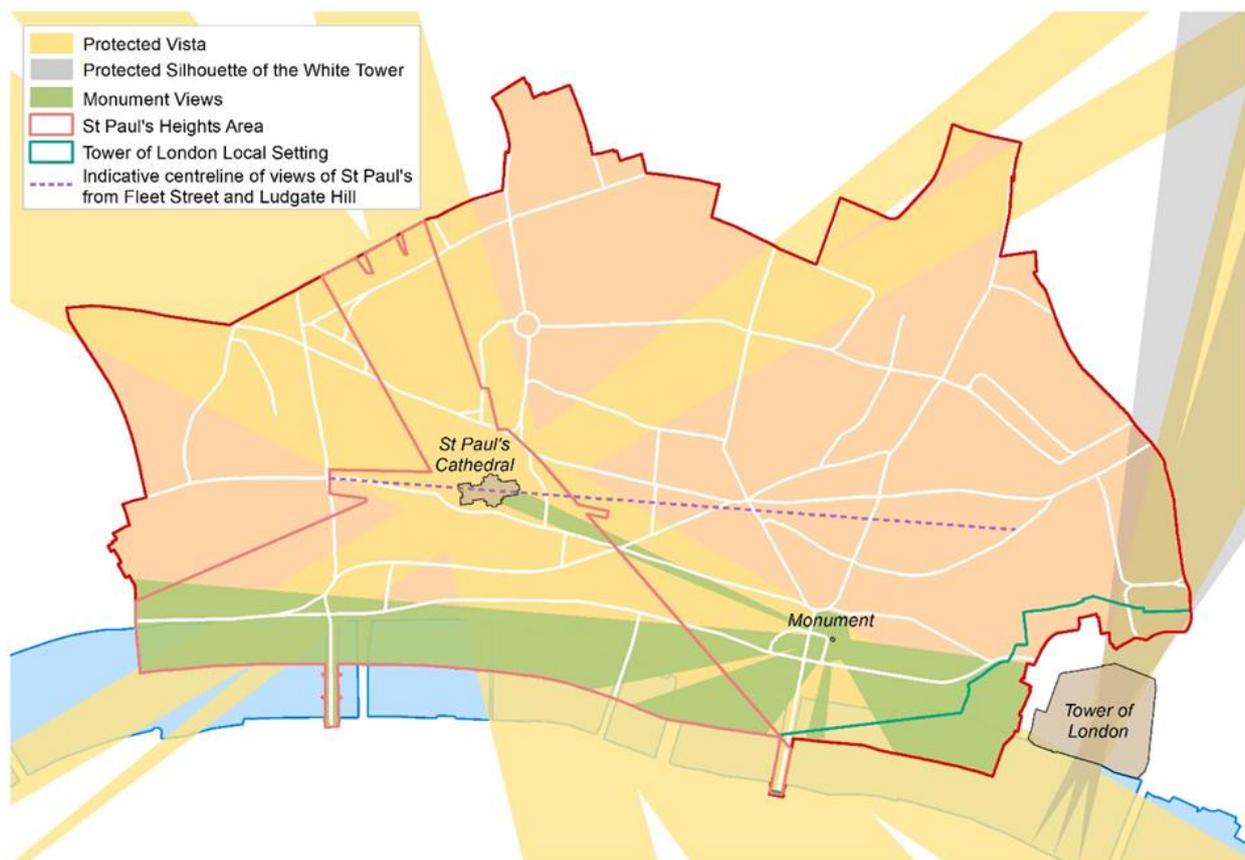


Figure 22: Areas covered by protected views

## How the policy works

6.5.14. Protected Vistas are defined geometrically from an assessment point at the view location to the Strategically Important Landmark that is the focus of the protected vista. Each Protected Vista includes a Landmark Viewing Corridor, within which development should not exceed the height of the threshold plane. Beside and behind Landmark Viewing Corridors are the Wider Setting Consultation Areas,

within which development that exceeds the defined LVMF threshold plane should not compromise the viewer's ability to recognise and appreciate the Strategically Important Landmark.

- 6.5.15. Other designated strategic views have defined assessment points but are protected by qualitative assessment of the impact of a proposal on the important elements of the view. For the City, most of the relevant views are 'River Prospects' from Thames bridges and the riverside walk. The Mayor of London's London View Management Framework (LVMF) SPG (2012) provides more detail, including detailed management plans for each strategic view of landmarks such as St. Paul's Cathedral and the Tower of London.
- 6.5.16. The LVMF defines a Protected Vista and a White Tower Protected Silhouette for the Tower of London. Any development in the Wider Setting Consultation Area in the background of this Protected Vista and the White Tower Protected Silhouette should preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. City sites have the potential to be intrusive in the view because of their relative proximity to the Tower. Therefore, proposed new development in the City which exceeds the defined LVMF threshold plane for this view will not be acceptable as it will not preserve this view. The City Corporation's Protected Views SPD provides further details and guidance on the protected views within the City.
- 6.5.17. The Tower of London has additional view protection, implemented through the Tower of London World Heritage Site Management Plan (2016). This defines and protects a range of settings of the Tower World Heritage Site, which includes its relationship to historic features that are visible in the urban landscape. All new buildings in the setting of the Tower should contribute to the quality of views both of and from the Tower.
- 6.5.18. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street, Ludgate Circus and Ludgate Hill which forms part of the long established royal and state processional route between Westminster and the City. The views of St Paul's are kinetic, changing as the viewer moves along the length of this route, depending on the topography and alignment of buildings. Development proposals that could be visible from places along this route should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure 22 to highlight this issue. Further details will be set out in an update to the Protected Views SPD, which will include a Statement of Significance and 3D digital modelling information to inform the future conservation and enhancement of this approach.
- 6.5.19. New development proposals should be well designed in their own right. Their bulk and form should not be based solely on the parameters set by the requirements and consideration of the protected views. In determining planning applications for tall buildings, the City Corporation will take account of guidance from the Design Council/CABE, Historic England and the Greater London Authority.

6.5.20. The City Corporation will co-operate with the Mayor, London boroughs and other local planning authorities, where proposed development outside of the City impacts on strategically important views of St Paul's Cathedral, to ensure that development does not adversely impact on the view.

6.5.21. The City Corporation will supplement its assessment of strategic and locally protected views with a visual assessment carried out using 3D digital modelling technology. Developers should submit virtual models for all major development in an open source or other format compatible with the City Corporation's 3D digital model.

## 6.6. Open Spaces and Green Infrastructure

### Context

6.6.1. The City of London is a dense urban environment containing many small open spaces and pocket parks. These spaces are vital to the City, offering residents, workers and visitors outside spaces in which to work or to relax and appreciate the streetscape. There is a growing recognition that green infrastructure helps to mitigate some effects of climate change, provides benefits for well-being and mental health and improves air quality. These same small green spaces are essential for wildlife found in this urban setting. The policy seeks to provide further green infrastructure, open space provision and biodiversity within the City.

### **Strategic Policy S14: Open Spaces and Green Infrastructure**

The City Corporation will work in partnership with developers, landowners, the churches and other agencies to promote a greener City by:

- Protecting existing open and green space;
- Seeking the provision of new open and green space through development, public realm or transportation improvements;
- Increasing public access to existing and new open spaces;
- Creating, maintaining and encouraging high quality green infrastructure;
- Using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality;
- Promoting the greening of the City through new development opportunities and refurbishments; and
- Ensuring new development and refurbishment protect and enhance the City's biodiversity.

### Reason for the policy

6.6.2. The City is densely built up and most of its open space provision consists of small spaces at street level. Green infrastructure in the City includes civic spaces, parks and gardens, churchyards, burial grounds, green roofs and walls in addition to amenity spaces. A key environmental asset is the River Thames.

6.6.3. Open and green space is under increasing pressure due to the intensification of development, an expanding workforce and growing visitor numbers projected over the Plan period. It is important that access to these spaces is protected and expanded as they provide multiple positive impacts on physical health and mental wellbeing, including providing opportunities for exercise, to reduce stress levels, and to facilitate social interaction.

6.6.4. The City of London Corporation is committed to protecting existing open spaces and expanding the provision of green infrastructure as far as possible consistent with heritage significance. The City Corporation seeks further urban greening to

make the Square Mile more attractive to workers, residents and visitors. This would contribute to the Mayor of London's ambition to make over 50 per cent of London green by 2050 and support London's designation in 2019 as the world's first National Park City.

6.6.5. Given that space is at a premium in the City, all new developments and refurbishments will be required to include a greening element to the building and/or the public realm where consistent with good design and area character. This approach will have many benefits over time such as improving the urban environment for biodiversity, reducing rainwater run-off, reducing air and noise pollution, regulating temperature, and making the City a more desirable business location by improving visual amenity. Public access to greening elements should be achieved wherever possible.

#### How the policy works

6.6.6. The City of London Corporation will work with developers and landowners at all stages of the development process and actively monitor developments from pre-application stage through to post completion to ensure that the highest standards of green infrastructure are achieved, and existing provision is improved.

### **Open Spaces**

#### **Policy OS1: Protection and provision of open spaces**

The quantity, quality and accessibility of public open space will be maintained and improved.

- Existing open space will be protected, particularly spaces of historic interest.
- Where a loss of existing open space is proposed, it must be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site;
- Additional publicly accessible open space and pedestrian routes will be sought in major commercial and residential developments wherever practical but particularly in areas of open space deficiency and where pedestrian modelling shows significant pressure on City streets;
- Further public spaces will be created from underused highways and other land;
- Public access will be secured, wherever possible, to existing and proposed private spaces;
- Access to new and existing open spaces will be improved; and
- Open spaces must be designed to meet the needs of all the City's communities.

### Reason for the policy

6.6.7. The City of London has 376 open spaces totalling just under 34 hectares which includes parks, gardens, churchyards and hard open spaces such as plazas and improvements to the highway. Most of the open spaces are small, with approximately 80% of sites less than 0.2 hectares in size and only 11% over half a hectare. There is a need for additional open space in the City to provide facilities for the growing daytime population, to help reduce the effects of pollution and climate change, to provide facilities for relaxation, tranquillity, agile working, leisure and sport, and to increase biodiversity.

### How the policy works

6.6.8. Many open spaces in the City are of historic value, such as churchyards, while others are of more recent origin. New or improved spaces are created through a programme of public realm enhancements undertaken by the City Corporation and others. Policy DE3 sets out standards for public realm improvements. These new spaces may be public highway land or private space around buildings. They offer the opportunity to create areas which meet a range of needs.

6.6.9. The provision of open space across the City is uneven. The northern area of the City contains just over half of all the open space in the City, due to the relatively large amounts of space in the Barbican and Golden Lane estates and the Broadgate commercial estate. There is significant open space along the Thames and the riverside, with the Riverside Walk, the Temples legal precinct and space close to the Tower of London. A new area of public realm will be created at Blackfriars foreshore as a result of the Thames Tideway Tunnel project. Although open space provision in the Aldgate area has been significantly enhanced with the opening of Aldgate Square, this area and the City Cluster areas have the lowest proportions of open space and face pressure from the increasing employment and pedestrian numbers associated with commercial intensification (see Figure 15). Additional open space is especially important in these areas, both at street level and at higher levels through the provision of accessible roof gardens/terraces.

6.6.10. There is intense pressure on all the City's open spaces particularly at lunchtimes and new development provides opportunities to create additional open space in and around buildings. These spaces should be designed for multiple uses, be maintained to a high standard and be resilient to future climate conditions.



Figure 23: Open Spaces in the City of London

## Policy OS2: City Greening

1. The provision of urban greening should be integral to the design and layout of buildings and the public realm.
  - All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context;
  - The installation of biodiverse extensive or intensive green roofs, terraces and green walls will be sought, where appropriate, and new development should not compromise these elements on existing buildings located nearby; and
  - The loss of green walls and roofs, in whole or in part, will only be permitted in exceptional circumstances.
2. Major development proposals will be required to:
  - Include an Urban Greening Factor (UGF) calculation demonstrating how the development will meet the City's target UGF score of 0.3 as a minimum; and
  - Submit an operation and maintenance plan to demonstrate that the green features will remain successful throughout the life of the building.

## Reason for the policy

- 6.6.11. Urban greening provides a wide range of benefits for air quality, noise, urban heat island effect, rainwater run-off, biodiversity enhancement, recreation, and health and wellbeing of the City's communities. This will increase in importance as weather patterns continue to change with rising average temperatures, summer droughts and more intense rainfall events periodically through the year. The inclusion of blue infrastructure such as rain gardens and rainwater harvesting can help to minimise water use.
- 6.6.12. Evidence demonstrates a positive correlation between urban greening and good mental and physical health. The provision of large green spaces in the City's high-density urban environment is difficult to achieve. Small areas of soft landscaping, green walls and green roofs, associated with buildings and the public realm, will play a vital role in promoting wellbeing. Increased access to green spaces will be sought.
- 6.6.13. The City Corporation has long championed green roofs and continues to actively encourage them, but other forms of greening are less common in and around new buildings. The City Corporation will seek the provision of trees and landscaping in all development where this is possible. Vertical greening such as green walls will be sought on buildings which do not provide for overnight sleeping accommodation. Green walls bring many of the same benefits to the environment as green roofs and can improve the appearance of locations where there is limited opportunity for horizontal planting. To be successful they require careful design, installation and regular maintenance.
- 6.6.14. Green roofs should be designed, installed and maintained appropriately and can be designed as sustainable or ecological features, and recreational spaces. To ensure that the maximum practicable coverage of green roof and terraces can be achieved, location-appropriate plants should be installed on sloping roofs, between cradle tracks and underneath solar panel installations.
- 6.6.15. There are two main types of green roofs, intensive green roofs which can be used as recreational spaces with similar features to parks and gardens, and extensive ones (including BioSolar green roofs) having plants such as sedums and wildflowers but with limited or no access. Varying extensive green roof substrate levels will be encouraged to improve rainwater retention and enhance biodiversity, using a high proportion of native plants. Where developers seek to install intensive green roofs with deep substrates for amenity space, these are expected to be of high-quality design incorporating rainwater harvesting for irrigation to minimise water use.
- 6.6.16. The green roof should not impact adversely on protected views and planting should be appropriate to the location and height of the roof. All green roofs should be designed, installed and maintained appropriately for the life of the building to maximise the roof's environmental benefits including biodiversity, rain-water run-off attenuation and building insulation.

## How the policy works

- 6.6.17. This policy promotes greening for all new buildings and public realm schemes. It takes account of the value of different types of greening through the application of an Urban Greening Factor (UGF), with a higher UGF for greening that provides multiple benefits.
- 6.6.18. The London Plan has introduced a UGF scoring system for London, which will operate as a tool to assess the amount, type and value of greenery within development proposals. The London Plan recommends interim target scores, pending work by individual boroughs and the City Corporation to develop their own approaches tailored to local circumstances.
- 6.6.19. The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City. The Study considered the potential for an UGF on a range of development types, including offices, residential, hotels and mixed commercial. Policy OS2 requires major development proposals in the City (commercial and residential) to include an UGF calculation demonstrating how it will meet the minimum UGF target of 0.3.
- 6.6.20. Developers will need to provide evidence to justify why the UGF target cannot be met. The City Corporation will take a flexible approach where delivery of the target UGF would detract from the heritage significance of a building or conservation area.
- 6.6.21. Development proposals could include greening of roofs, facades, terraces and balconies, both internal and external, and/or landscaping around the building depending on the circumstances of each site. The UGF assessment should be submitted as part of the planning application, along with landscaping proposals and an operation and maintenance plan to show how the greenery will be maintained. This will ensure that suitable green elements are designed in and will remain attractive and viable throughout the life of the development.
- 6.6.22. More details including a worked example of a UGF calculation are set out in Appendix 1 of the Local Plan.

## **Biodiversity**

### **Policy OS3: Biodiversity**

Development should aim to secure net gains for biodiversity where possible by incorporating measures to enhance biodiversity, including:

- Retention and enhancement of habitats within Sites of Importance for Nature Conservation (SINCs), including the River Thames;
- Measures recommended in the City of London Biodiversity Action Plan (BAP) in relation to particular species or habitats;
- Green roofs and walls, gardens and terraces, soft landscaping and trees;
- Green corridors and biodiversity links;

- Wildlife-friendly features, such as nesting or roosting boxes;
- A planting mix and variation in vegetation types to encourage biodiversity;
- Planting which will be resilient to a range of climate conditions, with a high proportion of native plants;
- A lighting scheme designed to minimise impacts on biodiversity.

#### Reason for the policy

6.6.23. Protecting and improving biodiversity involves enhancing wildlife populations and their habitats. This has positive impacts for the environment, the economic and social life of the City and the aesthetics of the streetscape. Healthy biodiversity should be viewed as a sign of a healthy environment and healthy city.

6.6.24. The City has 13 Sites of Importance for Nature Conservation (SINCs), including three new SINCs (Postman's Park, Portsoken Street Garden, St Dunstan in the East Church Garden) which were agreed following a review in 2016. Two existing SINCs were agreed to be upgraded as part of this review: Barbican and St Alphage Garden, which includes the Barbican Wildlife Garden and the Beech Gardens, was upgraded from Grade 2 to Grade 1 Site of Borough Importance for Nature Conservation (SBINC); and Roman Wall, Noble Street, which was extended southwards to include St Anne and St Agnes Churchyard and was upgraded from a Local SINC to a Grade 2 SBINC. These new and upgraded SINCs will formally take effect upon adoption of this Plan.

6.6.25. A number of areas along the riverside, west of Farringdon Street and east of Bishopsgate have been identified as areas of deficiency in access to nature by the GLA. It is important that opportunities are taken to improve biodiversity throughout the City, and particularly in areas where this would improve green corridors or biodiversity links, such as along the riverside. The River Thames, which is a Site of Metropolitan Importance for Nature Conservation (SMINC), brings wider benefits for migrating birds and fish species.

#### How the policy works

6.6.26. Measures to enhance biodiversity should provide habitats that benefit the City's target species (house sparrows, peregrine falcons, swifts, black redstarts, bats, bumblebees and stag beetles) and by extension a wider range of insects and birds. The City of London BAP provides further details about the target species and their habitats. The BAP will be kept under regular review.

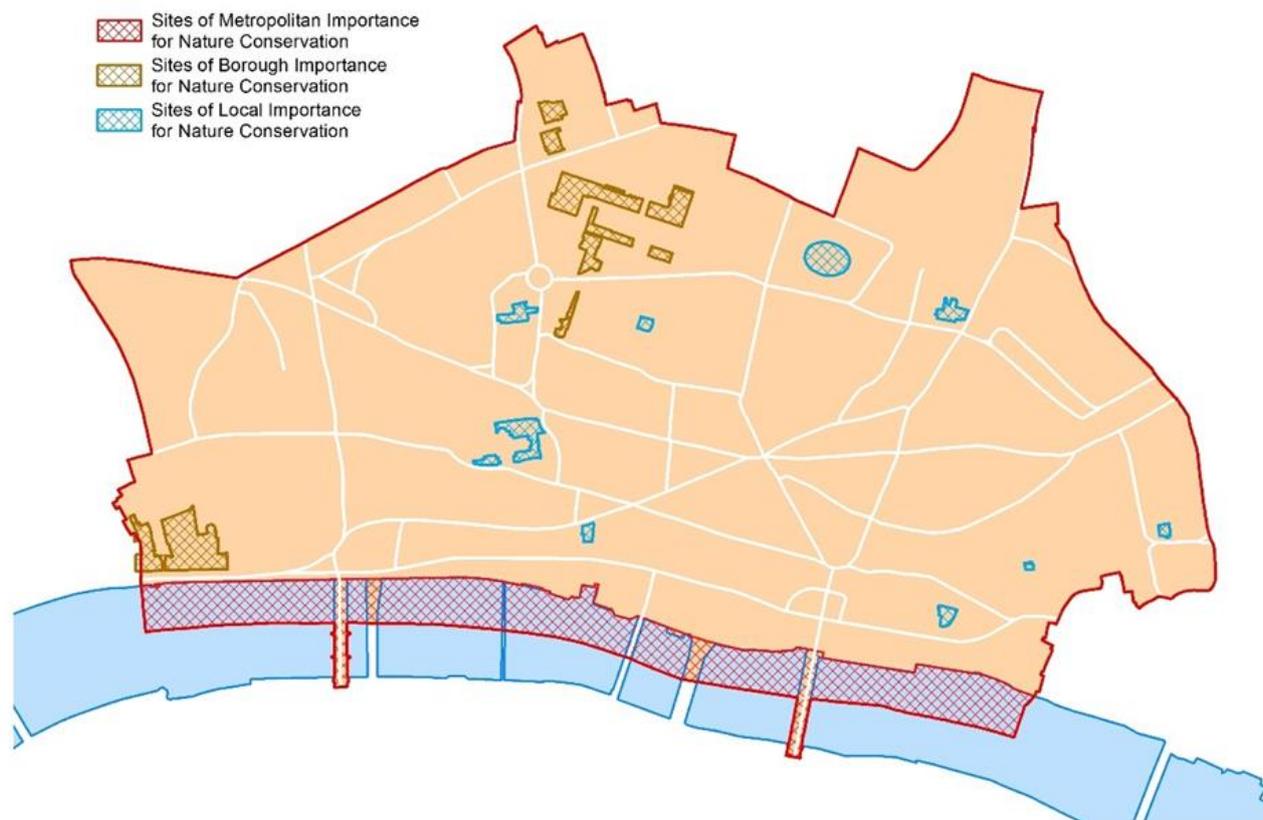


Figure 24: Sites of Importance for Nature Conservation (SINCs)

6.6.27. New developments should seek to protect and enhance biodiversity and the City's environmental assets. This can be achieved by providing spaces for biodiversity to flourish through the retention and planting of trees and soft landscaping, along with green roofs and walls where possible. A variety of these provisions in one development will create habitats for a range of different wildlife species. Joined up green spaces and corridors give species a better chance of survival in the urban landscape and greater resilience to future climate change. These measures will assist in the delivery of the All London Green Grid (ALGG) to promote the design and delivery of green infrastructure across London.

6.6.28. The City's wildlife depends not only on greenery but also on the built environment. Buildings can provide roosting sites for bats and nesting opportunities for birds. Artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species.

6.6.29. Proposals for riverside developments should consider whether there may be opportunities to incorporate habitat creation measures to enhance the biodiversity of the River Thames SMINC.

6.6.30. Where development has a potential impact on designated sites of importance for biodiversity, the developer should submit an ecological statement outlining how any

impacts will be avoided, minimised or mitigated. Where necessary, the City Corporation will seek independent review of an assessment, paid for by the developer.

6.6.31. Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. The Mayor of London will be producing guidance to set out how biodiversity net gain applies in London.

## Trees

### Policy OS4: Trees

The City Corporation will seek to increase the number of trees and their overall canopy cover by:

- Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate;
- Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value;
- Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value;
- Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; and
- Promoting tree planting to provide a diverse range of tree species, including large-canopy trees wherever practicable.

### Reason for the policy

6.6.32. There are just over 2,500 trees in the City, which are found in a variety of locations: along streets, in open spaces such as churchyards and livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.

6.6.33. Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to enhancing amenity and townscape. Trees provide a wide range of benefits in the urban environment, including the trapping of air pollutants, enhancing biodiversity, providing shade and shelter from sun and rain, absorbing rainwater and filtering noise.

6.6.34. The City of London Tree Strategy SPD aims to increase the number of City Corporation owned trees and ensure that all trees within the City are managed,

preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the townscape for both current and future generations. The Tree Strategy SPD will be kept under review and should be read alongside the City of London Biodiversity Action Plan (BAP).

6.6.35. Trees play an important role in connecting green spaces to create green corridors. Additional planting where feasible will help to reinforce those corridors. It is important that new tree planting includes a variety of species to increase the resilience of the City's tree stock against the threat of disease and the impacts of a changing climate.

#### How the policy works

6.6.36. Developers will be expected to safeguard existing trees, plant new trees and only remove trees in exceptional circumstances. Where trees are removed during development works, replacement trees of an appropriate species, height and canopy cover must be planted when works are completed. The City Corporation will seek financial compensation for any trees removed or damaged without permission. This value will be based on a recognised tree valuation method such as the Capital Asset Value for Amenity Trees (CAVAT) or i-Tree Eco.

6.6.37. The City Corporation will use TPOs, s106 planning obligations or conditions to ensure the retention of existing trees and the provision of new trees.

## 6.7. Climate Resilience and Flood Risk

### Context

6.7.1. This section aims to ensure that the City of London remains resilient to changing climate patterns. The main focus is on flood risk and the risk of overheating of buildings and spaces which will become more frequent as a result of climate change.

6.7.2. The UK Climate Projections (CP18) predict that London will experience a rise in mean temperatures of between 2°C and 6°C by 2061. This will increase the risk of overheating and the need for energy intensive air conditioning. In addition to this the City can experience temperatures up to 10°C higher than the countryside around London, due to heat retention and waste heat expulsion from buildings resulting in an Urban Heat Island Effect. Climate change could potentially affect patterns of wind flow in high-density urban environments like the City and this will be kept under review. The City Corporation has adopted a Climate Action Strategy setting out how the City can transition to a zero carbon economy by 2040 and be resilient to the impacts of climate change.

### **Strategic Policy S15: Climate Resilience and Flood Risk**

Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

- Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;
- Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;
- Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise.

### Reason for the policy

6.7.3. Today's new buildings will probably be in place for decades or longer and must be resilient to the weather patterns and climate conditions they will encounter during their lifetime. Designing climate resilience into buildings and the public realm will help keep the City safe and comfortable as climate patterns change. Policy DE1 (Sustainability standards) sets out standards for new development in the City and the City Corporation's ambition to move to a zero emission City by 2040. This includes scope 3 emissions and embodied carbon which can be addressed through whole life carbon assessment.

6.7.4. Although the total annual rainfall is projected to remain broadly similar to current levels, patterns of rainfall are expected to change with more intense storms and periods of low rainfall. This will increase the risk of flooding, particularly from surface water and from sewer surcharge from London's combined drainage network. Conversely there will be a greater risk of water shortages and drought conditions as rainfall fluctuates.

6.7.5. The City lies within the tidal section of the Thames and is vulnerable to sea level rise resulting from climate change. The Thames Estuary 2100 Plan identifies the need for the existing flood defences in central London to be raised by up to 0.5m by 2065 and 1m between 2065 and 2100 to protect London from flooding.

#### How the policy works

6.7.6. The City Corporation will continue to monitor and model climate change impacts on the City to inform policy and decision making through implementation of, and annual monitoring and review of, the City Corporation's Climate Action Strategy. UK Climate Projections and the detailed actions in the Climate Action Strategy will form the basis of future planning for climate resilience in the City. The City of London Strategic Flood Risk Assessment will be reviewed at least every five years or more frequently if circumstances require.

6.7.7. Developers will be required to demonstrate that their proposals have taken account of predicted climate change and will minimise the impacts of changed climate patterns on future occupants and the City's communities.

#### **Policy CR1: Overheating and Urban Heat Island Effect**

1. Developers will be required to demonstrate that their developments have been designed to reduce the risk of overheating through:
  - solar shading to prevent solar gain, particularly on glazed facades;
  - urban greening to improve evaporative cooling;
  - passive ventilation and heat recovery;
  - use of thermal mass to moderate temperature fluctuations;
  - minimal reliance on energy intensive cooling systems.
2. Building designs should minimise any contribution to the urban heat island effect.

#### Reason for the policy

6.7.8. Development presents an opportunity to renew or adapt the existing building stock and public spaces, or provide new buildings and spaces, which will cope better with changing climate patterns. The design of buildings should reduce energy demands from cooling infrastructure, making them more resilient to higher temperatures. Measures such as urban greening and design features that provide shade and shelter can have a positive impact on or near the building, minimising the urban heat island effect (see Policy OS2).

6.7.9. Climate adaptation measures can contribute to wider benefits by pre-empting potential detrimental climate impacts. Careful selection of plants which are resilient to a range of weather conditions will assist wildlife to survive changed climate conditions. Urban greening and reduced reliance on air conditioning will have benefits for the City's air quality.

### How the policy works

6.7.10. For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.

6.7.11. For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.

### **Policy CR2: Flood Risk**

All development within the City Flood Risk Area, and major development elsewhere, must be accompanied by a site-specific flood risk assessment demonstrating that:

- the site is suitable for the intended use, in accordance with the Sequential and Exception tests (see tables 4 and 5) and with Environment Agency and Lead Local Flood Authority advice;
- the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere;
- safe access and egress routes are identified; and
- flood resistance and resilience have been designed into the proposal.

### Reason for the policy

6.7.12. While the City is generally at low risk of flooding due to its topography, some parts of the City are at risk of flooding from the River Thames and from surface water/sewer overflow in the former Fleet valley.

6.7.13. Figure 25 identifies the areas at risk from these sources as the City Flood Risk Area. This policy will ensure that vulnerable uses are not located in areas that are at risk of flooding and that suitable flood resilience and evacuation measures are incorporated into the design.

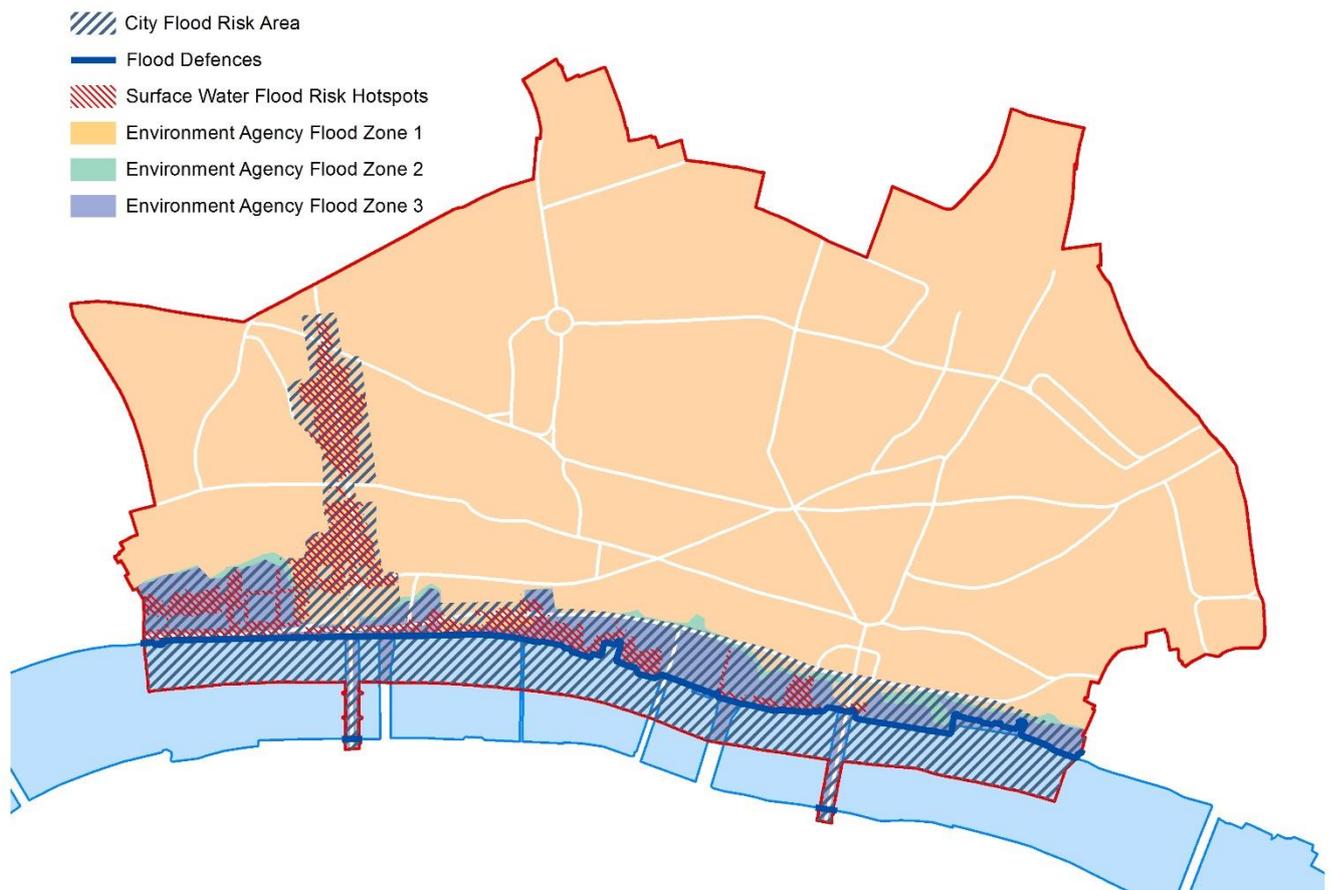


Figure 25: City Flood Risk Area

### How the policy works

6.7.14. Site-specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment and the City of London Local Flood Risk Management Strategy. Necessary mitigation measures must be designed into and integrated with the development. Design and mitigation measures such as sustainable drainage systems may provide protection from flooding for properties beyond the site boundaries.

6.7.15. Within the City Flood Risk Area different uses will be acceptable in different zones. Table 4 shows the vulnerability classifications and Table 5 shows which level of vulnerability classification is suitable in which part of the City Flood Risk Area. The Environment Agency's flood zones are shown on the Policies Map. The Sequential Test must be applied for all development other than minor development or change of use in the City Flood Risk Area, which comprises Environment Agency Flood Zones 2 and 3 and areas at risk of surface water / sewer flooding. Where a change of use results in a more vulnerable use evidence must be presented to demonstrate safety and suitable access and egress routes. Where necessary, conditions may be attached to planning permissions to manage the change of use into more vulnerable categories.

<b>Essential Infrastructure</b>	<ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations</li> </ul>
<b>Highly Vulnerable</b>	<ul style="list-style-type: none"> <li>• Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Installations requiring hazardous substances consent.</li> </ul>
<b>More Vulnerable</b>	<ul style="list-style-type: none"> <li>• Hospitals</li> <li>• Residential institutions such as care homes and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Sites used for waste management facilities for hazardous waste.</li> </ul>
<b>Less Vulnerable</b>	<ul style="list-style-type: none"> <li>• Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in 'more vulnerable' and assembly and leisure.</li> <li>• Police, ambulance and fire stations which are not required to be operational during flooding.</li> <li>• Waste treatment (except hazardous waste facilities).</li> </ul>
<b>Water-compatible development</b>	<ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Sewage transmission infrastructure and pumping stations</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> </ul>

Table 4: Flood risk vulnerability classifications relevant to the City  
Source: Relevant uses from Planning Practice Guidance – Flood Risk and Coastal Change

6.7.16. If the intended use of a site falls into one of the categories where an Exception Test is required, as set out in Table 5, the developer will need to investigate whether there is a reasonably available site outside the City Flood Risk Area which would be more suitable for the intended use. If no alternative site is available, the developer must demonstrate through the Exception Test that the benefits of the development outweigh any risk from flooding, and that the development will be safe without increasing the risk of flooding elsewhere.

Flood Risk Vulnerability classification	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
EA Zone 1	✓	✓	✓	✓	✓
EA Zone 2	✓	Exception Test required	✓	✓	✓
EA Zone 3a	Exception Test required	x	Exception Test required	✓	✓
EA Zone 3b	Exception Test required	x	x	x	✓
SFRA Surface water/sewer flood risk areas	Exception Test required	x	Exception Test required	✓	✓

Table 5: Suitability of different uses in flood zones

Source: amended from Planning Practice Guidance – Flood Risk and Coastal Change

6.7.17. The City of London Strategic Flood Risk Assessment (SFRA) provides guidance on suitable flood resistance measures to prevent water entering the building and flood resilience measures, which enable speedy recovery in the event of flooding. These measures should be specified for all development within the City Flood Risk Area and may be controlled by condition. Passive design measures such as suitable threshold levels and the use of flood resilient materials will be favoured over active measures such as removable flood barriers. All sleeping accommodation must be located above the modelled tidal breach level as shown in the SFRA unless it can be demonstrated that a permanent fixed barrier at the threshold of the property would prevent water ingress in a breach event.

6.7.18. Design measures can help to reduce flooding, thus protecting the local area beyond the development site through:

- sustainable drainage systems;
- green/blue roofs; and
- rainwater reuse, recycling and attenuation

6.7.19. Resistance to flooding can be achieved through design measures such as:

- raised kerbs and altered topography which contains water at a distance from the building;
- avoiding opening windows or vents at ground floor or basement levels;
- using low permeability materials to limit water penetration of external walls, and flood resistant doors to prevent water ingress; and
- fitting non-return valves on plumbing to prevent sewer surcharge within the building.

6.7.20. Flood resilience measures make clean up after a flood more efficient, and include:

- avoiding locating sensitive equipment such as computer servers at lower levels of buildings in flood prone areas;
- locating all fittings, fixtures and services at a suitable height to minimise damage by flood waters;
- using impermeable surfaces and structures; and
- providing sumps and soak-aways that gradually release water to the sewer network.

6.7.21. In order to demonstrate that the development will be safe for occupants, flood warning and evacuation plans should be provided for all 'more' or 'highly' vulnerable development within the City Flood Risk Area. Details of the type of measures which should be included in an evacuation plan are set out in the City's SFRA.

6.7.22. For minor development outside the City Flood Risk Area, an appropriate flood risk statement should be included in the Design and Access Statement.

### **Policy CR3: Sustainable drainage systems (SuDS)**

1. All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development.
2. The design of the surface water drainage system should be integrated into the design of proposed buildings and landscaping, unless there are exceptional circumstances which make this impractical. Proposals should demonstrate that run-off rates are as

close as possible to greenfield rates and the number of discharge points has been minimised.

3. SuDS designs must take account of the City's archaeological and other heritage assets, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
4. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces.
5. An operation and maintenance plan will be required to ensure that the SuDS elements will remain viable for the lifetime of the building.

#### Reason for the policy

6.7.23. The drainage system in Central London comprises a combined network where foul sewage from internal plumbing combines with rainwater drainage in the same underground pipework. Consequently, heavy rain can result in overloading of the drainage network with discharges of diluted sewage from manholes within the City Flood Risk Area and combined sewer outflow pipes into the Thames at Walbrook Wharf and Blackfriars.

6.7.24. More frequent extreme rainfall events are predicted because of climate change and therefore the risk of sewer overflow flooding is increasing. To combat this, it is necessary to reduce the total amount of rainwater entering the drains and/or slow down the rate at which it enters the drains. Sustainable Drainage Systems (SuDS) provide a range of techniques for achieving this.

#### How the policy works

6.7.25. All development presents opportunities to reduce rainwater run-off. The cumulative impact of minor development, transport and public realm proposals are as important as major development in reducing the risk of sewer overflow flooding. Therefore, all development, transport and public realm proposals must contribute to a reduction in rainwater run-off to the drainage network.

6.7.26. For major development, pre-application discussion with the City Corporation as Planning Authority and Lead Local Flood Authority and consultation with the Environment Agency, Thames Water and other interested parties is encouraged to ensure that SuDS designs are suitable for the proposed site. SuDS designs must comply with the London Plan Drainage Hierarchy and local requirements should be discussed at pre application stage with the City Corporation.

6.7.27. Although planning permission may not be required for all transport and public realm schemes, SuDS and drainage plans should be integrated into the design process of these schemes to protect the City from flooding.

6.7.28. For all major development, a separate SuDS and Drainage Plan must be submitted at application stage. For minor development the Design & Access

Statement should include details of how rainwater run-off has been minimised. Designs should focus on reducing flows as close as possible to greenfield runoff rates, minimising the number of discharge points from the site.

- 6.7.29. Proposals should demonstrate an integrated approach to water management, for example intercepting the first 5mm of each rainfall event through greening and incorporating rainwater storage for reuse or irrigation. Major developments should specifically maximise the other benefits of SuDS such as biodiversity, amenity and water quality.
- 6.7.30. Arrangements for maintenance throughout the life of the building must be considered in the design of SuDS. Planning conditions may be used to secure a suitable operations and maintenance plan.

#### **Policy CR4: Flood protection and flood defences**

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm.

#### Reason for the policy

- 6.7.31. The City of London is protected from flooding by the Thames Barrier, and more locally by flood defence walls along the River Thames. The Thames Estuary 2100 (TE2100) project recognises the need for the raising of flood defences by up to 0.5m by 2065 and 1m by 2100.

#### How the policy works

- 6.7.32. Development adjacent to the flood defences must maintain their integrity and effectiveness for the benefit of the whole City. Development on the riverside should be designed to enable future flood defence raising without adverse impacts on river views, the setting of historic buildings and pedestrian movement along the riverside walk. Constraints may exist where flood defences form part of an existing building. Discussions with the Environment Agency will be required to establish the most effective designs for improved flood defences and to incorporate adequate set back from the defences to allow for future maintenance and raising in line with the TE2100 Plan.
- 6.7.33. A strategic approach to flood defence raising will enable riparian developers to design buildings and the riverside environment to accommodate higher flood walls. Riparian owners are responsible for maintenance and enhancement of flood defences.

## 6.8. Circular Economy and Waste

### Context

6.8.1. The City Corporation is the Waste Planning Authority (WPA) for the Square Mile, with a statutory duty to plan for all the waste that is generated in the City. With no waste treatment plants in the City, the City Corporation relies on WPAs elsewhere to provide such facilities. By applying circular economy and waste hierarchy principles: designing for durability and modularity, making better use of under-used assets through sharing, reusing products and materials and recycling as much as possible, waste can be designed out and embodied carbon retained. This approach will reduce waste exports from the City whilst application of the proximity principle will ensure that residual waste is processed as close as possible to the City.

### Strategic Policy S16: Circular Economy and Waste

1. The City Corporation will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.
2. The City Corporation will actively co-operate with other Waste Planning Authorities in planning for capacity to manage the City's residual waste through:
  - Identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with other London Waste Planning Authorities;
  - Co-operating with Waste Planning Authorities within and beyond London to plan for suitable facilities for the City's waste;
  - Safeguarding Walbrook Wharf as a waste site and wharf suitable for the river transport of waste; and
  - Monitoring waste movements to and from the City and reviewing its waste arisings and capacity study at least every five years.

### Reason for the policy

6.8.2. The City Corporation has responsibility to plan for adequate facilities to manage the waste that originates in the City. This includes waste collected from the City's households and businesses, waste generated in the process of redevelopment and hazardous waste from premises such as St Bartholomew's Hospital.

6.8.3. The London Plan and the London Environment Strategy set the framework for waste management in London. These strategies promote circular economy principles and the waste hierarchy: prevention, preparing for reuse, recycling, other recovery, and disposal only as a last resort.

6.8.4. The current London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage 100,000 tonnes of waste annually until 2036. In the draft London Plan, the proposed apportionment for the City is reduced to 84,000 tonnes per annum in 2021 and 90,000 tonnes per annum in 2041. This

figure represents the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's household and commercial and industrial waste from 2026.

- 6.8.5. The London Plan sets out criteria for the selection of waste management sites, which the City of London Waste Arisings and Waste Management Capacity Study review 2016 used to evaluate potential sites in the City. This study concludes that, with current technologies and economic considerations, there is no viable waste management capacity within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries.
- 6.8.6. The City Corporation has an agreement with the London Borough of Bexley and participates in the South-East London Joint Waste Planning Group, which comprises the boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark along with the City of London. The Group has identified sufficient waste management capacity up to 2036 to meet the combined apportionment of each of its individual members. The City will continue to contribute to London-wide waste planning through membership of the London Waste Planning Forum and will work with the GLA and the Environment Agency to improve waste planning.
- 6.8.7. For commercial reasons, a proportion of the City's waste will continue to be transported to sites outside London. This includes construction, demolition and excavation (CD&E) waste which is not covered by the Mayor's targets for net self-sufficiency. Annual monitoring of such waste exports will inform Duty to Co-operate discussions with receiving authorities within and outside London to ensure that sufficient capacity remains in the planning pipeline.
- 6.8.8. The London Plan sets out borough apportionments for land-won aggregates which should be reflected in local plans. No apportionment is made for the City of London and there is no requirement to include a policy for minerals within the Local Plan. Application of circular economy principles encourages the re-use and recycling of demolition waste and the use of recycled aggregates in order to reduce reliance on imported aggregates and retain embodied carbon.
- 6.8.9. It is imperative that the City adopts circular economy and waste hierarchy principles, to cut down on the quantity of useable materials that are discarded and to eliminate reliance on disposable items, including single use plastics, in the City. Those materials that are discarded should be managed as close as possible to the City and transported by modes that are least damaging to the environment.

#### How the policy works

- 6.8.10. The City Corporation will continue to monitor the quantities and types of waste originating in the City and work with the City's communities to minimise this waste, applying circular economy principles to design out waste and pollution and keep products and materials in use. The City Corporation will continue to work with the South-East London Joint Waste Planning Group and other Waste Planning Authorities in London and beyond to ensure that the City's waste apportionment is met and that suitable facilities are available for the City's waste to be managed in the most sustainable way.

- 6.8.11. Changing economics and new waste management technologies means that small scale waste management is becoming more viable within the City, particularly within large development sites.
- 6.8.12. During the period 2018 – 2036 a proportion of the City of London’s waste will continue to be managed outside London. Co-operation with waste planning authorities outside London will aim to ensure that facilities with sufficient capacity remain available to accept the City’s waste during this period.
- 6.8.13. The City Corporation will continue to safeguard Walbrook Wharf as a waste site and river wharf in line with the London Plan and the Safeguarded Wharves Direction. Any proposed development which would prejudice the operation of the existing safeguarded waste site at Walbrook Wharf will be refused.

### **Policy CE1 Zero Waste City**

1. Development should be designed to promote circular economy principles throughout the life cycle of the building through:
  - Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment;
  - Re use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources and retain embodied carbon;
  - Requiring development to be designed to allow for disassembly, reuse and recycling of deconstruction materials;
  - Requiring the maximum use of recycled materials in development and off-site construction methods to reduce wastage; and
  - Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building’s operational phase.
2. All development proposals should incorporate waste facilities which must be integrated into the design of buildings and allow for separate treatment, storage and off-road collection of waste and recyclable materials, where feasible. Major developments should provide a single waste collection point to facilitate efficient waste management from multi tenanted buildings.

### Reason for the policy

- 6.8.14. The circular economy is an alternative to the typical ‘linear’ way of treating resources. By finding ways of remanufacturing, reusing or recycling materials and keeping them in use for longer, waste can be reduced. The circular economy emphasises design for durability and modularity, making better use of under-used assets through sharing and offering products as a service. Circular economy principles can be applied to buildings and the development cycle, reducing the demand for new materials, and to the operational phase of a building’s life to minimise annual waste arisings.

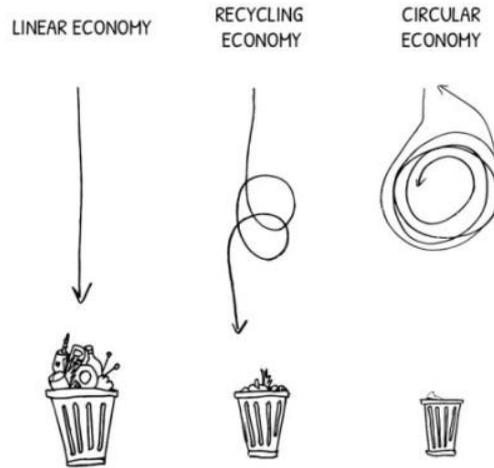


Figure 26: Circular Economy

6.8.15. The design of buildings impacts on the potential for implementation of the waste hierarchy during their operational stage, through the facilities and waste management services that are incorporated into the design. For example, reliance on single use coffee cups and disposable plastics can be reduced by incorporating kitchen facilities and water fountains into building designs and waste movements can be reduced by managing food waste on-site through composting or anaerobic digestion. These facilities must be considered at the building's design stage.

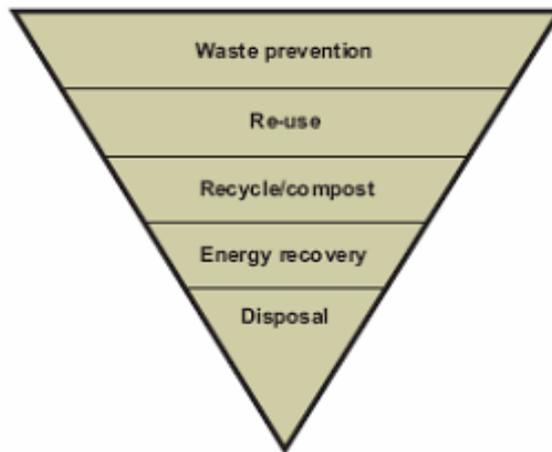


Figure 27: Waste Hierarchy

6.8.16. Waste prevention is the most desirable action in the waste hierarchy as it results in no waste whatsoever. Re-use is the next most desirable option as it involves products and materials being used again for their original intended purpose. Recycling is the next most preferable option, involving the collection of used items and processing them into raw materials to be remanufactured into usable products or materials. The recovery of energy, through techniques such as anaerobic digestion, is a way of getting the most out of otherwise useless waste. Disposal should be the absolute last resort, after all the other options have been exhausted.

- 6.8.17. On major developments opportunities for waste minimisation and on-site waste treatment, in line with the London Plan's definition of waste management, should be explored in order to minimise the transport of residual waste within and beyond the City. The City of London Waste Arisings and Capacity Study identifies a range of options which should be considered, subject to the appropriate environmental permits, to facilitate a reduction in residual waste from City development sites.
- 6.8.18. Waste treatment, storage and collection facilities must be integrated into new development and considered at an early stage of design to avoid the problems created by the placing of waste on the highway. Adequate provision must be made for the volume and types of residual waste and recyclables expected to be generated, especially the amount of paper and packaging generated by offices. The need to avoid health hazards associated with waste from catering establishments, the waste storage and collection needs of street traders, the separate storage of recyclable waste and the special arrangements required for the storage and transportation of clinical and hazardous waste should be provided for, where necessary.

#### How the policy works

- 6.8.19. Pre-application consultation on suitable waste treatment, storage and collection facilities is encouraged. The level of detail required at the planning application stage will be proportionate to the scale of development.
- 6.8.20. The Environmental Statement (for EIA applications) or sustainability statement should provide an assessment of on-site waste treatment options and quantities of residual waste likely to arise from the site.

#### **EIA Development**

- 6.8.21. For development that requires an Environmental Impact Assessment (EIA) the Environmental Statement should demonstrate how circular economy principles have been incorporated into the development, fully addressing how construction, demolition and excavation (CD&E) waste will be minimised, deconstruction materials will be reused or recycled and the waste arisings during the operational phase of the development will be minimised and managed. This should include consideration of on-site facilities to reduce the need for waste vehicle movements such as on-site composting or anaerobic digestion, or waste consolidation.
- 6.8.22. A Circular Economy Statement following the London Plan guidance should be submitted for all EIA development.

#### **Other Major development**

- 6.8.23. For all other Major development proposals, the sustainability statement should provide evidence of the application of circular economy principles and the adherence to the waste hierarchy. This could include reuse of existing buildings and structures, provision of Site Waste Management Strategies for the construction phase and Zero Waste Plans for the operational stage of the development. Major development should aim to achieve maximum BREEAM credits for Waste.

6.8.24. A Circular Economy Statement following the London Plan guidance should be submitted for all Major development.

### **All other development**

6.8.25. For all other development, the Design and Access statement should demonstrate how waste minimisation and the circular economy have been considered in the design of the development.

6.8.26. Waste and recyclables should be capable of collection from off-street service areas which are integrated into the design of buildings. The provision of such areas may not be practicable in small developments or refurbishments and may conflict with the protection of listed buildings and conservation areas. In such cases waste stores within the site near the highway are preferable to the presentation of waste and recyclables on the pavement. Residential developments, including short-term-lets, must be provided with ground floor waste and recyclables storage and collection facilities, with direct access to the highway for collection purposes.

6.8.27. The City Corporation will attach appropriate planning conditions relating to waste treatment, storage and collection, but may also make use of its other regulatory powers to control waste in the City. Compliance with the City of London's operational waste requirements should contribute to BREEAM requirements for waste credits.

### **Policy CE2: Sustainable Waste Transport**

The environmental impact of waste transport will be minimised through:

- Encouraging the use of rail and waterways for removal of waste, including deconstruction waste and delivery of construction materials;
- Ensuring maximum use of rail and waterways for the transport of excavation waste particularly from major infrastructure projects;
- Requiring low and zero emissions transport modes for waste movement;
- Reducing the number of waste vehicles by promoting optimum use of waste transport vehicle capacity through on-site or multi-site consolidation of waste.

#### Reason for the policy

6.8.28. The proximity principle advocates that waste should be managed as close as possible to where it originates to reduce the environmental impacts of its transportation. The City's restricted land area makes the provision of waste facilities within the City problematic and it therefore relies on movement of the waste that is generated in the City to appropriate waste management facilities elsewhere in London and beyond London's boundaries.

6.8.29. Unlike other local authority areas, the majority of the waste that is generated in the City is managed by private contractors. A proportion of the City's waste, including the small fraction of household waste, is transported by river from the

safeguarded waste transfer station at Walbrook Wharf. The remainder is transported primarily by road, with destinations varying from one year to the next due to the commercial decisions of private waste contractors.

6.8.30. This policy aims to maximise the use of the River Thames for waste transport, encourage transport modes such as rail and other waterways and encourage efficient use of low and zero emissions road vehicles for transporting waste.

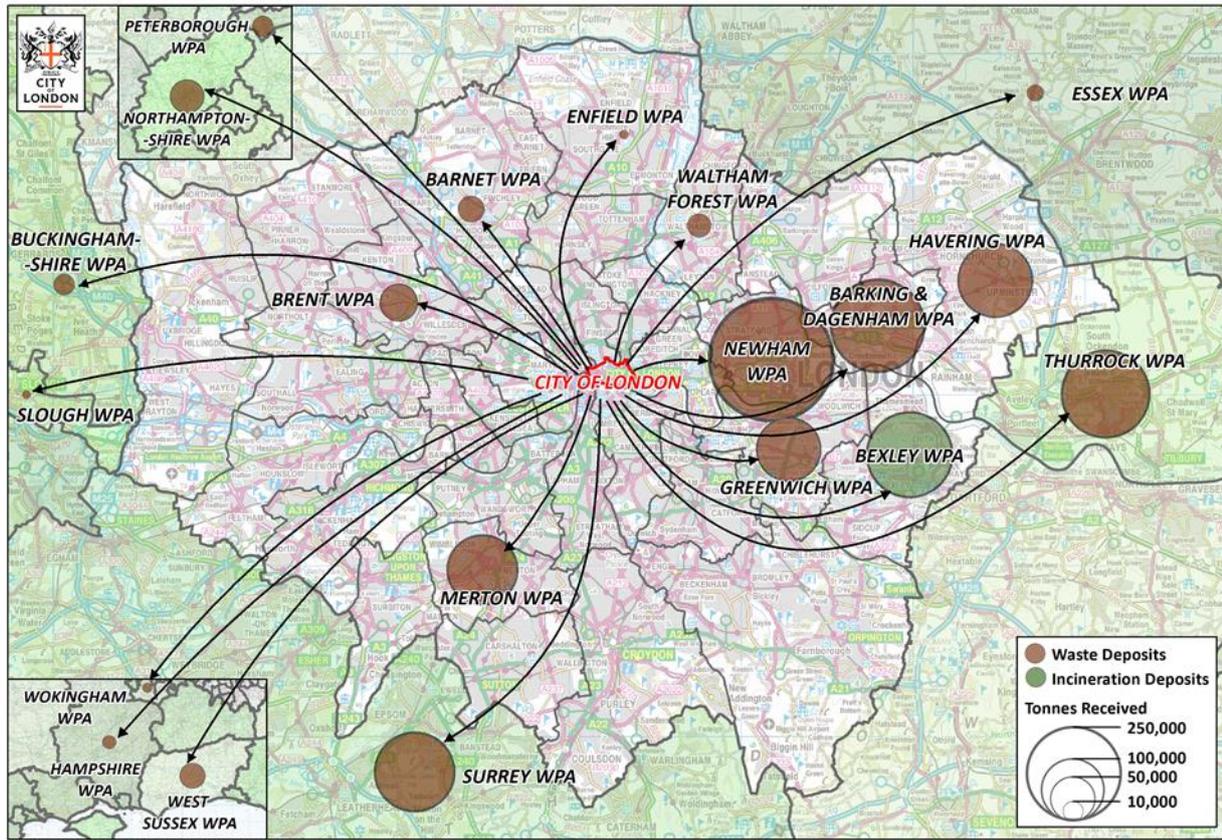


Figure 28: Destinations for the City's waste 2012-2018

### How the policy works

6.8.31. The City Corporation will continue to work with the Port of London Authority, Marine Management Organisation and the Environment Agency to enable sustainable use of the River Thames for the movement of freight and waste.

### Major development

6.8.32. Construction Logistics Plans should identify how sustainable transport of waste materials from the site will be addressed during the construction phase. Delivery and servicing plans should demonstrate how the transport of waste will be minimised, the potential for use of the river to move waste, and how low emission vehicles will be enabled during the operational phase of the building's life.

## All other development

6.8.33. Planning application documents should clearly demonstrate how waste minimisation, storage and sustainable waste transport have been addressed.

### Policy CE3: New waste management sites

1. Proposals for new facilities for waste management, handling and transfer will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:
  - the development will handle waste which has been generated locally;
  - access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
  - the carbon impact of the development will be minimised. New waste facilities should comply with the Mayor's Carbon Intensity Floor (CIF); and
  - the development is resilient to natural and man-made safety and security challenges.
2. Noise-sensitive development adjacent to the existing waste site at Walbrook Wharf and development which would compromise the use of the river for waste operations, will be resisted
3. Development in the vicinity of new waste management sites should not compromise the waste management operations on the site or create an unacceptable land use conflict.

#### Reason for the policy

6.8.34. Although the City is unlikely to be able to accommodate large waste management facilities within its boundary, changes in technology and waste transport costs may make small scale commercial facilities viable in the future.

#### How the policy works

6.8.35. Assessment of potential conflicts such as noise, vibration, odour, visual impact, pedestrian access and road or river transport will be a key matter in consideration of proposals. Mitigation which resolves potential conflicts may be necessary for development to proceed.

6.8.36. The criteria set out in this policy will be used, alongside other policy considerations, to evaluate the suitability of proposed waste facilities and conditions will be applied to ensure that any new facility is suitable for the City's high-density urban environment.

# 7. Key Areas of Change

## 7.1. Introduction

- 7.1.1. This section of the Plan sets out area-based policies and proposals relating to seven 'Key Areas of Change', together with an overarching policy which applies to the whole of the City's riverside. The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus.
- 7.1.2. Identifying Key Areas of Change provides a policy framework for bringing forward beneficial change within those areas, including the delivery of key development schemes, improving accessibility and the quality of the public realm, and introducing new uses or mixes of uses. The Key Areas of Change also provide a strategic context for the development of projects and funding bids by a range of City Corporation departments and external partners.
- 7.1.3. The Key Areas of Change are shown indicatively on the Key Diagram and on the individual diagrams that accompany each area policy.
- 7.1.4. Where appropriate, the City Corporation will prepare further guidance to support the delivery of the vision for particular Key Areas of Change. This may take the form of planning briefs or supplementary planning documents and will be produced in partnership with key stakeholders and local landowners.

## 7.2. Thames Policy Area

### Context

- 7.2.1. The River Thames is an iconic feature of London that forms the southern boundary of the City and plays a major role in its prosperity and everyday life. The riverside provides a breathing space from the busy environment which characterises the rest of the City, as well as a traffic-free walkway on the north bank of the Thames.
- 7.2.2. The River Thames serves several important functions, including as a corridor for freight and pedestrian transport, a tourism and recreational asset, a unique setting for views of the City and a Site of Metropolitan Importance for Nature Conservation (SMINC). The City's topography, with the land rising from the riverside, means that most of the City is at relatively low risk from flooding. Nevertheless, this risk needs to be managed, particularly in the face of climate change.
- 7.2.3. The London Plan requires the City's Local Plan to designate and ensure the maintenance of a Thames Policy Area and to take account of emerging Maritime Spatial Plans prepared by the Marine Management Organisation. Policy S17 sets out the policy considerations which apply to the whole of the City's riverside, as defined on the Policies Map. Further detailed guidance is provided in the City Corporation's Thames Strategy SPD. The City Corporation's Riverside Walk Enhancement Strategy sets out its plans for public realm enhancement along the riverside, which forms part of the Thames Path National Trail.
- 7.2.4. The River Thames changes character on its way through the City, as it does through London. It includes areas where very limited change is likely to occur, such as at The Temples. However, two areas, at Blackfriars and the Pool of London, have been identified as Key Areas of Change because they are places where renewal is desirable and where there is potential for significant redevelopment and enhancement of existing buildings and the public realm during the Plan period. Policies relating to Blackfriars and the Pool of London follow the overarching policy for the Thames Policy Area.

### **Strategic Policy S17: Thames Policy Area**

The unique character of the City's riverside, and its uses for transport and recreation, will be enhanced by:

1. Designating the Thames Policy Area and preparing and keeping under review a Thames Strategy SPD, which identifies the attributes of the area and gives guidance on development within this area.
2. Co-operating with neighbouring boroughs to develop a joint Thames Strategy for the central section of the River Thames.
3. Ensuring that buildings and spaces on or near the riverside contribute to sustainable economic growth and further the aims of the Riverside Walk Enhancement Strategy, particularly through:

- protecting and enhancing public access and river views along the riverside walk and securing completion of the riverside walk at Queenhithe;
- improving access to the River Thames by enhancing north-south routes and the creation of a continuous riverside walk;
- improving the vibrancy of the riverside by encouraging a mix of commercial and cultural uses and promoting office-led commercial development, while safeguarding heritage assets and biodiversity value;
- provision of publicly accessible roof terraces, where they do not impact adversely on protected views, the amenity of occupiers or nearby residents; and
- supporting the Illuminated River project to deliver more sustainable bridge lighting and engage visitors with the River.

4. Supporting, and safeguarding land for, the construction of the Thames Tideway Tunnel.

5. Promoting the use of the River Thames and its environs for transport, navigation and recreation, particularly through:

- safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;
- encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
- resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river-related purpose and not have a detrimental impact on navigation or the environment; and
- maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

6. Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.

### Reason for the policy

7.2.5. There are a range of different strategies and plans which affect the Thames including:

- The London Plan, which sets out strategic policies for the River Thames and requires the designation of a Thames Policy Area.
- The Mayor of London's Safeguarded Wharves Review 2018-19, which aims to ensure that London's need for waterborne freight-handling uses is met.
- 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.
- Guidance called A Safer Riverside produced by the Port of London Authority, which aims to reduce the number of people drowning in the Thames by ensuring that safety is an intrinsic part of all development alongside and on the tidal Thames.
- The UK Marine Policy Statement and the emerging South East Marine Plan produced by the Marine Management Organisation, which will provide a wider strategic context. Until that Plan has been adopted, reference should be made to the UK Marine Policy Statement, which sets out a framework and UK high level marine objectives.

7.2.6. The City of London Thames Policy Area is designated as the part of the City where development and change could affect aspects of the river and its importance. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

7.2.7. The London Plan notes that no joint strategy currently exists for the central section of the Thames between Chelsea and Tower Bridge, and the City Corporation will work actively with neighbouring boroughs to help produce a joint Strategy. The City Corporation is undertaking research into the practical implications of raising the City's flood defences in line with the Thames Estuary 2100 Plan and is collaborating with neighbouring boroughs to promote shared learning and a common approach by all riparian authorities in central London.

7.2.8. A key infrastructure project is the development of the Thames Tideway Tunnel, which is a 25km tunnel running mostly under the tidal section of the River Thames through central London. It is intended to capture and divert storm overflows, including the Fleet Combined Sewer Outflow at Blackfriars, to Beckton Sewage Treatment Works to avoid discharging them into the river.

7.2.9. The 'Illuminated River Project' is a long-term art installation that involves the architectural illumination of bridges across central London. The project will animate the river and create further opportunities to develop the riverside walk for the enjoyment of visitors and London communities. The scheme commenced in summer 2019 and when complete will incorporate 15 bridges in total, of which six are partly or wholly in the City of London.

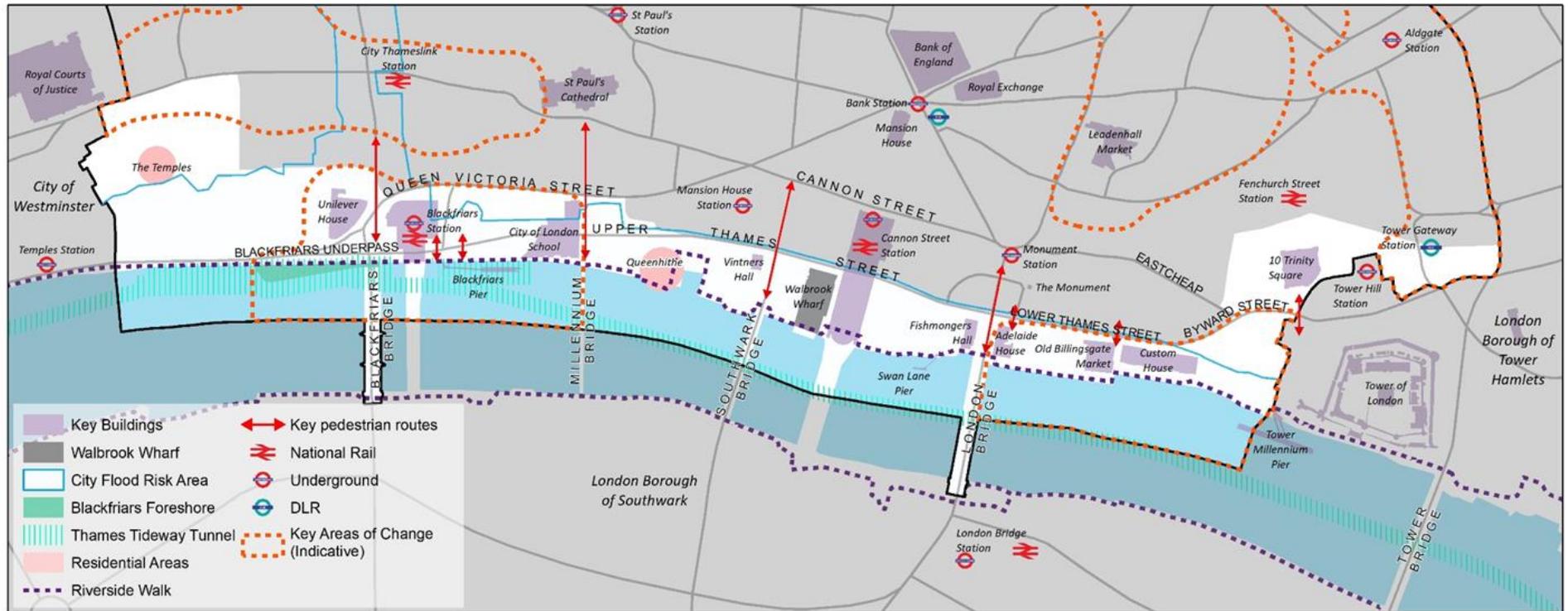


Figure 29: Thames Policy Area

## 7.3. Blackfriars Key Area of Change

### Context

- 7.3.1. The area contains a mix of uses, including offices and commercial uses, the City of London School, the Mermaid Events Centre, The Guild Church of St Benet Paul's Wharf, a public car park, Blackfriars Millennium Pier and Blackfriars Station. Most development is post-war, with large footprint buildings, few active frontages and a lack of open space.
- 7.3.2. It is bounded by major through routes (including Upper Thames Street) which generate pollution and are a barrier to pedestrian movement, separating the Riverside Walk from the rest of the City. Access to the Riverside Walk is limited at street level. Blackfriars Bridge forms an important connection between the City and Southwark and Blackfriars Station is a major Underground and Rail station.
- 7.3.3. There have been improvements along the Riverside Walk at Paul's Walk and the City Corporation's Riverside Walk Enhancement Strategy sets out plans for public realm enhancement along the riverside. Development of the Thames Tideway Tunnel will create a large new area of public realm built out into the river west of Blackfriars Bridge, which is due for completion in 2025. There are significant views of St Paul's Cathedral and the heights of new buildings are limited by strategic and locally protected views.

### **Strategic Policy S18: Blackfriars**

The character and amenities of the Blackfriars Key Area of Change will be enhanced by:

1. Promoting substantial redevelopment or refurbishment of existing post-war buildings to provide new high-quality office and commercial accommodation with active frontages at ground floor level;
2. Implementing the Thames Tideway Tunnel project and creating a high-quality new area of public realm at Blackfriars Bridge foreshore;
3. Enhancing pedestrian permeability and accessibility, especially through improvements to and along the riverside and the provision of new and improved links across Queen Victoria Street and Upper Thames Street to provide new north-south routes;
4. Encouraging cultural events, arts and play in public spaces, ensuring the retention or renewal of existing facilities, where appropriate; and
5. Improving the quality of the public realm and identifying opportunities for urban greening and pollution reduction measures, particularly along Puddle Dock, Castle Baynard Street, White Lion Hill, Upper Thames Street and the churchyard of The Guild Church of St Benet Paul's Wharf.

### Reason for the policy

- 7.3.4. This area contains some post-war development which is underused and does not contribute to the context or setting of its location. Except for the area adjacent to Blackfriars Station, this part of the City lacks vibrancy and due to the road network is notable for a relative lack of pedestrian permeability. Blackfriars has been identified as a Key Area of Change to facilitate beneficial commercial redevelopment, although this may be a medium or longer-term option due to existing leasehold arrangements.
- 7.3.5. Baynard House is a large office site and data centre, which includes a public car park. It is key to the potential renewal of Blackfriars, since redevelopment of this site would provide an opportunity to improve the quality of architecture and sense of place, to redesign the road network to reduce the dominance of vehicular traffic and to achieve direct pedestrian routes to the riverside.
- 7.3.6. Significant redevelopment would provide an opportunity for public realm improvements along Puddle Dock, Castle Baynard Street, White Lion Hill and Upper Thames Street, to reduce pollution and improve air quality. New active frontages will be sought as an integral part of any redevelopment. Pedestrian links across Upper Thames Street will be improved wherever possible to link the riverside to the rest of the City and to provide easier access to Blackfriars Pier. Proposals for redevelopment and the redesign of streets would be required to enhance the setting of The Guild Church of St Benet's Paul's Wharf and make it a more pleasant area to visit and dwell.
- 7.3.7. The public realm created by the Thames Tideway Tunnel project at Blackfriars Bridge will introduce additional greenery to the riverside and will bring more activity to the area by providing a new place for relaxation and recreation. This facility will include a viewing terrace, civic space, green terraces, and a venue for outdoor events and public artwork. The riverside walkway will be improved by links between the new area of public realm, Blackfriars Bridge and Paul's Walk and enhancements to the pedestrian route between Blackfriars Bridge and Millennium Bridge. There is potential to enhance heritage assets and their setting by increased pedestrian permeability and there will be new views of Blackfriars Bridge and this part of the City from the new area of public realm.

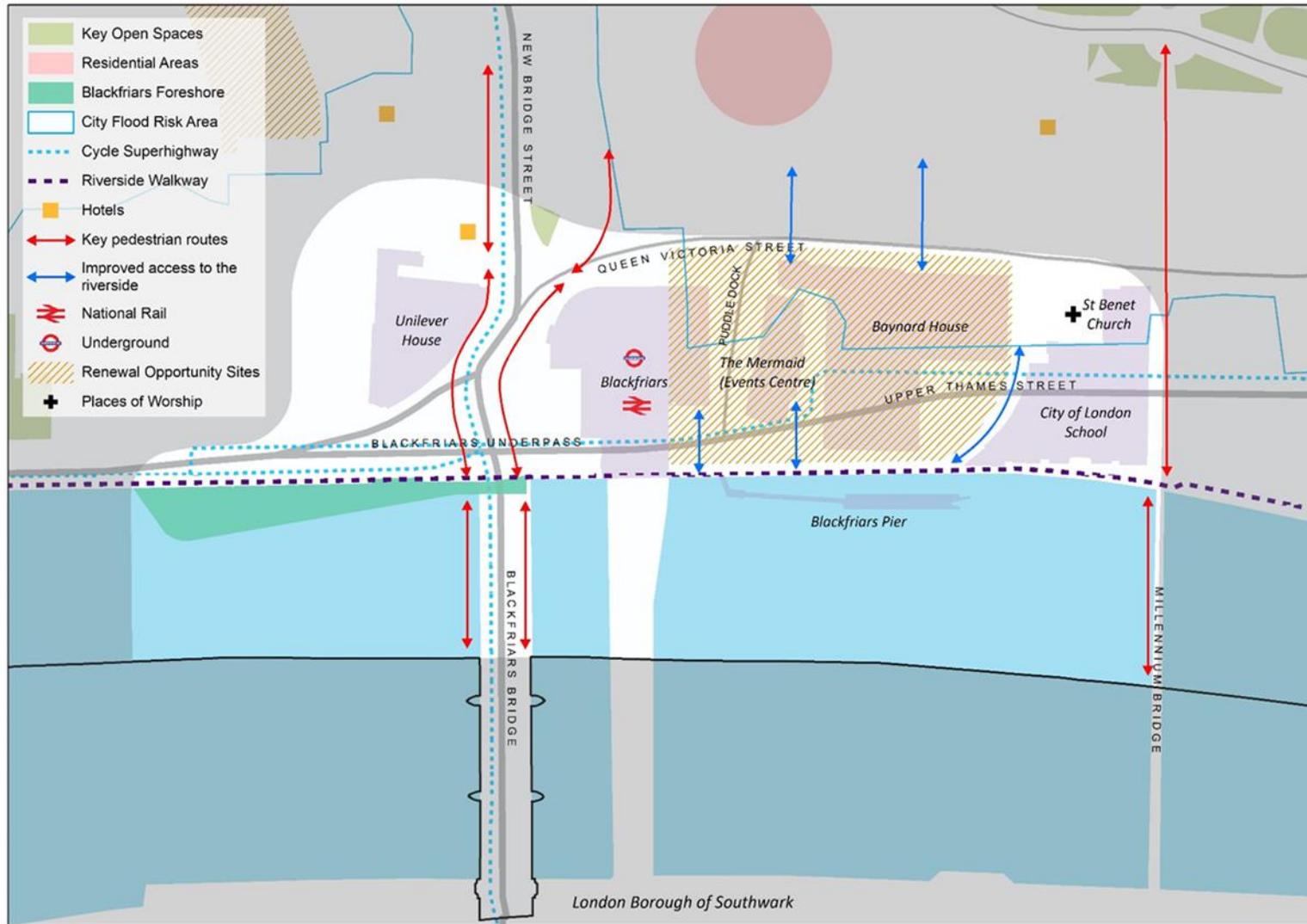


Figure 30: Blackfriars Key Area of Change

## 7.4. Pool of London Key Area of Change

### Context

- 7.4.1. The area is the heart of what was once a London's port which now contains predominately office and commercial uses, with some residential and hotel use and small-scale retail adjacent to the Tower of London. There are no tube or train stations within the area, but it is well served by public transport just outside the area, including London Bridge Station, Tower Hill and Monument Underground Stations, Tower Gateway DLR Station and the bus route along Eastcheap. River passenger services operate from Tower Pier.
- 7.4.2. Lower Thames Street acts as a significant barrier to pedestrian movement to and from the rest of the City and air quality is very poor. The opening of London Bridge staircase has encouraged more pedestrian movement between the Riverside Walk and London Bridge. However, there is limited retail or ground floor vibrancy and the public realm is uninspiring and does not reflect the importance of this area.
- 7.4.3. The building stock is a mix of offices, listed buildings, with modern residential and hotel development to the east. St Magnus the Martyr Church, All Hallows by the Tower Church and Custom House are Grade I listed. Adelaide House and Old Billingsgate Market are Grade II listed, while Custom House Quay, cranes and stairs are Grade II\* listed. Listed buildings and their key features should be enhanced. The eastern part of this area is within the local setting of the Tower of London World Heritage Site. The height of new buildings is limited by strategic and locally protected views.
- 7.4.4. Several key buildings are likely to be vacated in the short term, providing an opportunity for renewal through development and public realm improvements which enhance heritage assets. The aim is to achieve a City riverside which complements that on the south bank of the Pool of London.
- 7.4.5. The riverside walk forms part of the Thames Path National Trail and the River Thames is designated as a Site of Metropolitan Importance for Nature Conservation. Minimisation of flood risk and respect for the riverside's rich archaeological and ecological heritage, are important considerations in this area. The area beneath Billingsgate Market and the Billingsgate Bathhouse are Scheduled Monuments.

## **Strategic Policy S19: Pool of London**

The Pool of London Key Area of Change will be renewed through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:

1. Enabling office-led mixed commercial use redevelopment or refurbishment, including the provision of retail, cultural and leisure uses which are complementary to, and do not detract from, the primary business function of the City and which enhance heritage assets.
2. Requiring increased vibrancy and active frontages at ground floor level, through the provision of retail and publicly accessible, leisure and cultural uses on the river frontage.
3. Encouraging the provision of cultural events, arts and play in public spaces along the riverside, and ensuring their delivery through Cultural Plans.
4. Preserving and enhancing the area's significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation.
5. Improving transport connections and pedestrian links by:
  - improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
  - improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;
  - improving signage to and from the Pool of London to the Tower of London;
  - improving the servicing of buildings, encouraging the development of shared servicing bays and access points and collaborative management; and
  - preventing vehicular access onto the riverside walk and removing car parking areas upon redevelopment.
6. Enhancing public realm and public spaces by:
  - enhancing the Riverside Walk to create a continuous publicly accessible walkway free of cars between London Bridge and Tower Bridge which is accessible to all;
  - identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and buildings on redevelopment; and
  - seeking additional public space and play facilities.

### Reason for the policy

- 7.4.6. The Pool of London provides a visual gateway to the City of London from the Thames and is the historic port of London. Several key existing buildings are likely to become vacant in the short term and this provides an opportunity to enhance and renew the area to provide a high-quality environment for businesses, visitors and residents.
- 7.4.7. The area is predominantly commercial in character and this will continue through encouragement of office-led commercial development. Existing post-war buildings could be redeveloped or refurbished to provide high quality office space or other commercial activities where these are compatible with the business City. Listed buildings and their key features should be enhanced. There is potential to provide interpretation of the historic development of the area, its relationship with the original site of London Bridge and the significance of the riverside. The priority should be for office use, but there is also potential for complementary commercial and cultural uses compatible with the special interest of heritage assets and to encourage interpretation and public access to historic interiors.
- 7.4.8. Publicly accessible retail, cultural and leisure uses will be encouraged at ground floor level throughout the Pool of London to increase vibrancy and provide active frontages.
- 7.4.9. Redevelopment and refurbishment offer the opportunity to revisit existing servicing arrangements. Developers will be encouraged to work with adjoining landowners to deliver shared servicing strategies and to minimise movements onto Lower Thames Street.
- 7.4.10. Despite its significance, the Pool of London is relatively isolated from the rest of the City by Lower Thames Street. Working with TfL, the City Corporation will seek the improvement of existing crossing points across Lower Thames Street and the creation of new crossing points to encourage greater movement between the riverside and the rest of the City. Where possible, historic routes between the river and other areas of the City will be reinstated through the redevelopment and refurbishment of buildings.
- 7.4.11. The City Corporation will work closely with TfL, landowners and developers to design and deliver substantial improvements to the public realm along the riverside walk and routes to and along Lower Thames Street. Additional greening and open space will be encouraged, with tree planting in appropriate locations. Part of the Pool of London lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.
- 7.4.12. As well as delivering improvements in accessibility, vibrancy and public realm at street level, the City Corporation will encourage the provision of new, publicly accessible roof terraces and viewing areas through building redevelopment or refurbishment, whilst safeguarding existing protected views.

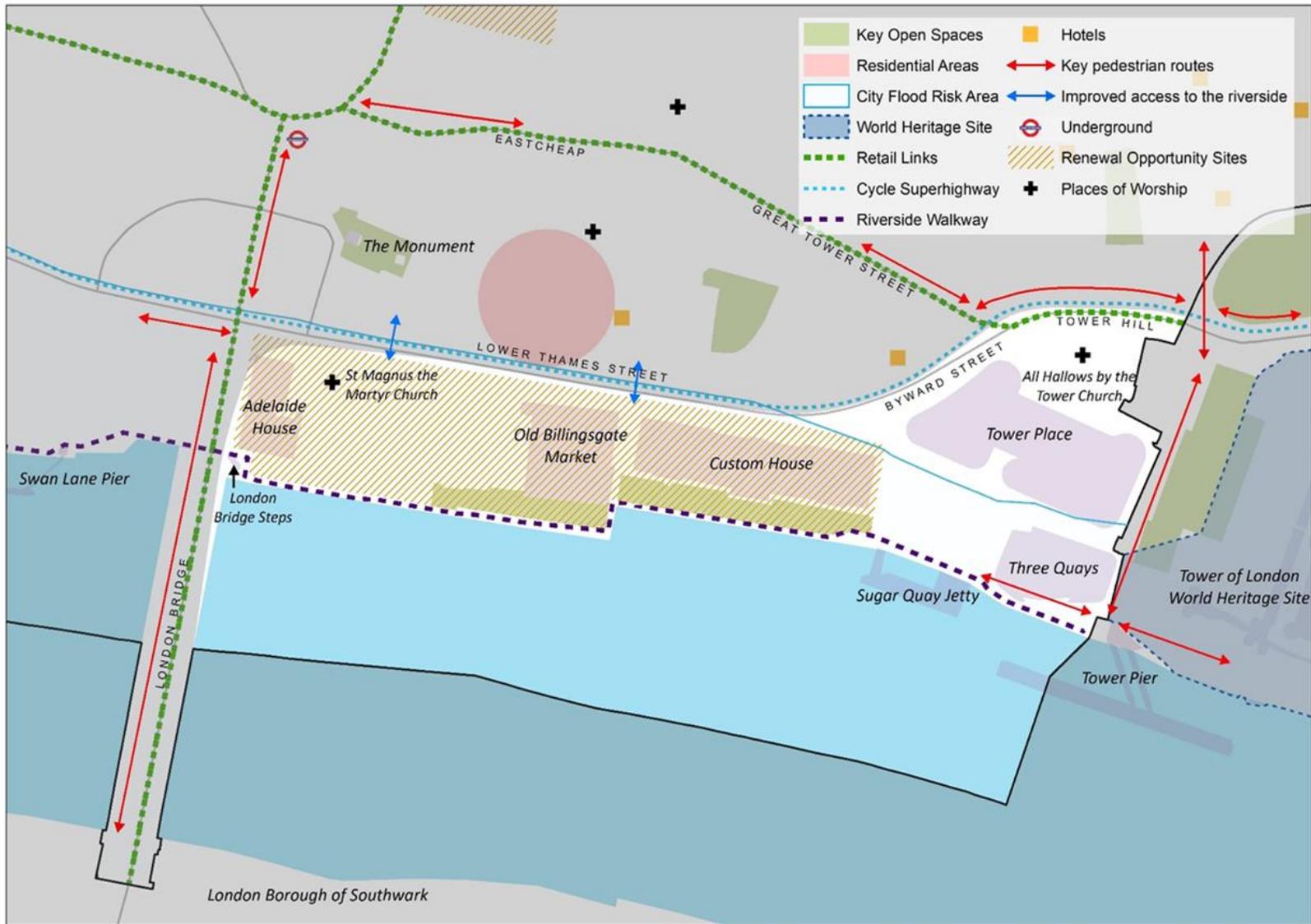


Figure 31: Pool of London Key Area of Change

## 7.5. Aldgate, Tower and Portsoken Key Area of Change

### Context

- 7.5.1. The Aldgate, Tower and Portsoken area is positioned in the east of the City the southern edge of the area is adjacent to the Tower of London.
- 7.5.2. The area contains a culturally diverse local population and a varied mix of uses, including offices, The Aldgate Primary School, Mansell and Middlesex Street housing estates, part of Petticoat Lane market and hotels and tourist activity associated with the Tower of London and Tower Bridge. There have been considerable improvements to the area in recent years, with the Aldgate gyratory being removed, a new square with a café and toilets created and public realm improvements implemented.
- 7.5.3. Major hotel and office developments are under construction on Minories. Proposals for the regeneration of the Mansell Street Estate have been considered and several large office sites currently have development potential. Petticoat Lane Market, a major tourist draw in the area, is undergoing public realm enhancement. These proposals and opportunities will impact on the area.
- 7.5.4. The Chinese Embassy could be moving to Royal Mint Court just outside of the City boundary and this may lead to further diplomatic and commercial interest in this area. The Elizabeth Line stations at Liverpool Street in the City and at Whitechapel in Tower Hamlets are both within walking distance of Aldgate.

### **Strategic Policy S20: Aldgate, Tower and Portsoken**

The Aldgate, Tower and Portsoken Key Area of Change will be promoted as a mixed-use area, which balances the competing needs of residents, workers and visitors, by:

1. Promoting office-led commercial development to assist in the further renewal of the area. Diplomatic use and associated commercial activity will be encouraged.
2. Supporting and enabling residential development in appropriate locations and identifying and meeting residents' needs, utilising a range of funding sources to:
  - maximise training, education and employment opportunities for residents;
  - maximise opportunities for delivering health, community and educational services and facilities for residents, particularly in the Aldgate Square area;
  - create additional publicly accessible open and green space and additional accessible play space for children;
  - encourage local retail facilities; and
  - facilitate the redevelopment potential of the Mansell Street Estate re-providing existing social housing, alongside additional residential units, reduced levels of air and noise pollution, community facilities and good quality open and play spaces.

3. Recognising the benefit and managing the impact of visitors to the area by:

- enhancing Petticoat Lane Market, celebrating the character and history of the area and improving the visitor experience by working in partnership with the London Borough of Tower Hamlets, market traders and other stakeholders;
- encouraging cultural events, arts and play in public spaces;
- permitting additional hotels on appropriate sites; and
- managing the impact of tourist attractions in the area to minimise disturbance to workers and residents.

4. Improving transport connections and pedestrian connectivity by:

- implementing improvements to street-level interchange between Fenchurch Street and Tower Hill/Tower Gateway stations, and exploring the feasibility of a direct interchange route;
- improving Aldgate Bus Station to improve air quality and deliver better access for pedestrians to and from community facilities, housing estates, open spaces and retail facilities;
- sealing the ramp leading to the closed Aldgate Gyratory underpass and enhancing the area;
- encouraging pedestrian routes and permeability through large development sites, particularly the Mansell Street Estate and between Minories and Mansell Street;
- improving signage for visitors from Liverpool Street to Tower Hill and from Aldgate to Cheapside and to other tourist attractions as necessary;
- enhancing links to the riverside walkway and the Tower of London; and
- enhancing the north-south walking route between Tower Hill and Aldgate along Vine Street.

5. Enhancing the public realm and open spaces by identifying opportunities for urban greening schemes, congestion and pollution reduction measures, particularly in the vicinity of The Aldgate School and Middlesex Street and Mansell Street Estates.

Reason for the policy

7.5.5. Until relatively recently, Aldgate was not as attractive for business investment as other parts of the City due to traffic levels, pollution and a lack of street-level activity. The City Corporation and its partners have sought to regenerate Aldgate by stimulating beneficial redevelopment and investing in a programme of environmental and public realm enhancements.

7.5.6. While there have been significant improvements, most notably the removal of the Aldgate gyratory and the creation of Aldgate Square, the Aldgate, Tower and Portsoken area contains major through routes and parts of the area still suffer

with associated congestion and poor air quality. The townscape around Tower Gateway is particularly affected by severance issues because of the road and rail networks, and there is currently little to entice visitors going to the Tower of London to explore this part of the City more widely. Tower Gateway lies within the Local Setting Area of the Tower of London World Heritage Site. Development proposals and public realm works in this area should seek opportunities to enhance the immediate surroundings of the World Heritage Site, as set out in Policy HE3.

- 7.5.7. Identifying this area as a Key Area of Change will assist in guiding further enhancement of the area during the lifetime of this Plan. There is likely to be further commercial development, especially through the refurbishment or redevelopment of older buildings. The area will also experience increased tourism activity, in line with the continued increase in tourist numbers in London as a whole.
- 7.5.8. Residents living on the Mansell and Middlesex Street Estates have lower levels of income, employment and education, skills and training than others in the City. The redevelopment potential of the Mansell Street Estate means that it could be one of the largest residential schemes in the City during the Plan period, which provides an opportunity to deliver additional housing to meet housing needs. Redevelopment would require the re-provision of existing social housing at equivalent rents and service charge, achieving a good quality residential environment at high densities and reducing residential exposure to air and noise pollution.
- 7.5.9. Development in the Aldgate, Tower and Portsoken area should enhance its appearance and vibrancy and will need to balance the interests of the residents who live in the area, particularly regarding air and noise pollution, with the increased cultural and commercial activities. With development occurring, small pockets of land may be vacant for long periods. Meanwhile uses for such land, including carefully designed green spaces, can help improve local air quality and be utilised by the local community, visitors and workers for leisure and sporting opportunities. Policies OF3 (Temporary 'Meanwhile' Uses) and HL7 (Sport and recreation) support this approach.
- 7.5.10. Policy S20 will be implemented through the determination of planning applications, the implementation of City Corporation strategies and public realm projects and working in partnership with a wide range of organisations.
- 7.5.11. Key partners include the London Borough of Tower Hamlets, which is working with the City Corporation to rejuvenate Petticoat Lane Market; TfL, which manages Aldgate Bus Station, Aldgate and Tower Hill Underground Stations and Tower Gateway DLR Station; Aldgate Connect, a cross-boundary Business Improvement District (BID), which will invest £4 million in projects in the area over the period to 2025; and Historic Royal Palaces, which manages the Tower of London World Heritage Site.

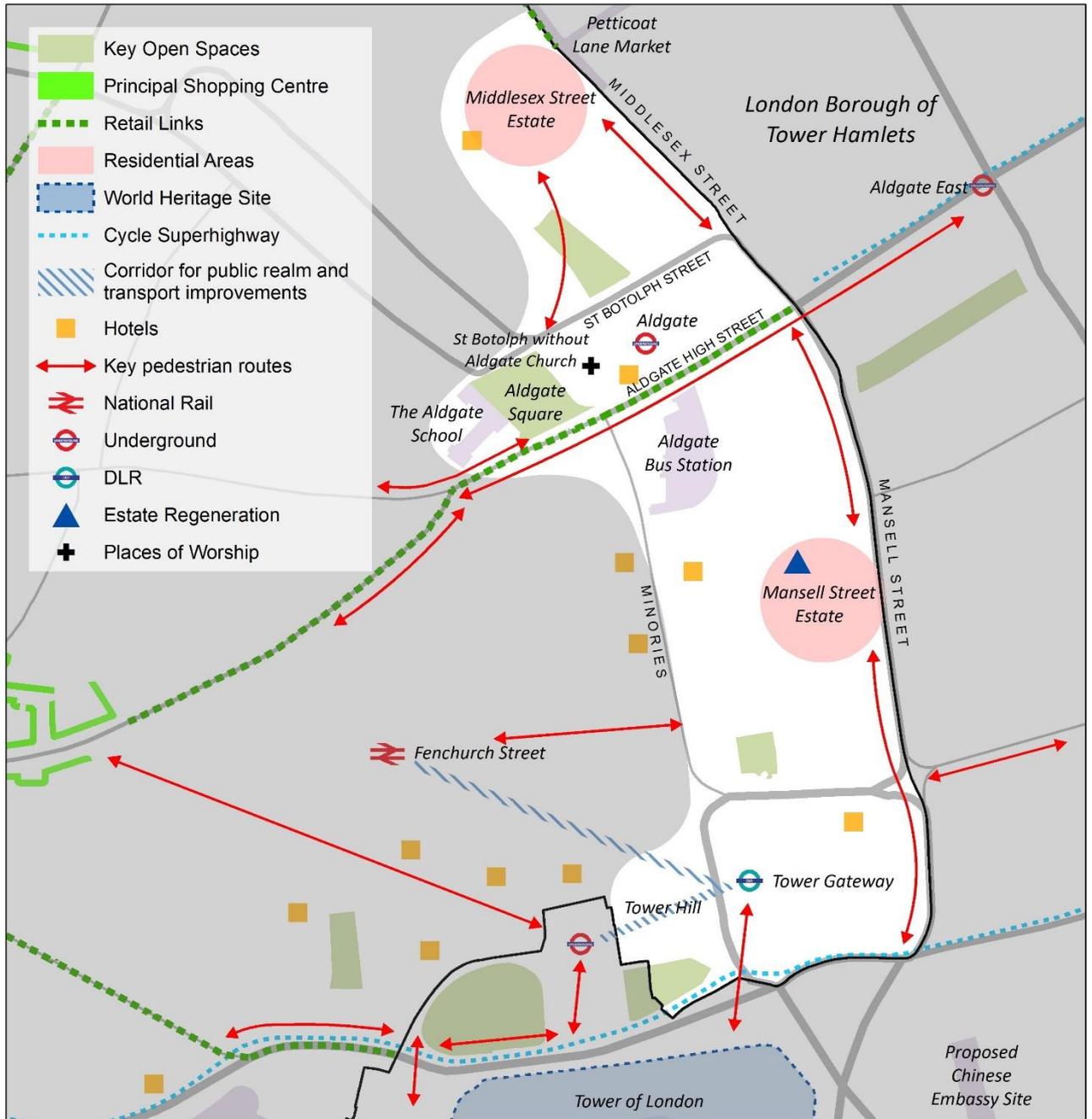


Figure 32: Aldgate, Tower and Portsoken Key Area of Change

## 7.6. City Cluster Key Area of Change

### Context

7.6.1. The east of the City contains a cluster of tall buildings which form part of a distinctive skyline and has the highest density of business activity in the City. It contains a concentration of offices in banking and insurance use and increasingly a wider range of technology, legal and business services. Protected views considerations allow for the construction of tall buildings on appropriate sites in the Cluster area. Recognisable and iconic tall buildings, including the Gherkin and the Leadenhall Building, have been constructed over the past 15 years and a number of significant tall buildings are under construction. Further tall buildings have been permitted but not yet commenced. Employment in the Cluster could increase from approximately 115,000 today, to over 200,000 once all current permissions are built out and occupied.

7.6.2. While increased remote working means that actual footfall may not rise in proportion to projected employment growth, the planned intensification of development in a relatively small geographic area is expected to lead to a significant increase in footfall on streets that are already crowded at peak times. The City Cluster adjoins the Liverpool Street Key Area of Change and the opening of the Elizabeth Line will bring increased pedestrian movement into the Cluster, with Bishopsgate a key pedestrian route into and through the area. This concentration of activity will require new approaches to freight and servicing, including the use of physical and virtual consolidation. To assist delivery of transformational projects in the Cluster, the City Corporation will support the work of the Eastern City Cluster Partnership in the process to become a Business Improvement District.

7.6.3. The Cluster is not only a significant employment and tall buildings location, it contains a number of heritage assets, including Leadenhall Market which provides a key retail use in the heart of the Cluster and a valuable contrast to the modern development that surrounds it. The St Helen's Place Conservation Area contains the churchyards of St Helen and St Ethelburga, providing open space and respite for workers. The Cluster also forms the focus of the annual Sculpture in the City exhibition and attracts visitors to its contemporary and historic architecture.

### **Strategic Policy S21: City Cluster**

The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, together with complementary land uses, transport, public realm and security enhancements, by;

1. Increasing the provision of world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers;
2. Delivering tall buildings on appropriate sites, including on Renewal Opportunity Sites. These should make a positive contribution to the City's skyline, preserving

- heritage assets and settings, taking account of the effect on the London skyline and on protected views;
3. Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
  4. Enhancing the streets, spaces and public realm to improve connectivity into and through the Cluster, and prioritising pedestrian movement during the daytime in key streets such as St Mary Axe, Leadenhall Street and Lime Street;
  5. Delivering a high-quality public realm, maintaining the quality of the microclimate and increasing urban greening;
  6. Ensuring the provision of high-quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
  7. Introducing new approaches to freight, construction logistics and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth; and
  8. Improving access to retail, leisure, cultural, health and educational facilities and services by encouraging a range of complementary land uses, ensuring active frontages at ground level and supporting activities such as 'Sculpture in the City'.

#### Reason for the policy

7.6.4. The City Cluster has been identified as the area within the City that is most suitable for tall buildings on sites which are less constrained by view protection policies than elsewhere. The spatial extent of the Cluster and the Renewal Opportunity Sites has been informed by technical work undertaken to develop the City's 3D digital modelling, which shows that there is scope for further tall buildings, although not every site within the Cluster will be suitable. Market demand for new office space in this area has remained high and a large proportion of the office development pipeline is within the City Cluster. The resulting increase in floorspace and employment will inevitably put more pressure on public transport, streets, open spaces and services.

7.6.5. Office development within the City Cluster will be expected to deliver flexible floorspace to meet the needs of a range of occupiers and ensure the City's stock is resilient and ready to respond to changes in the market. While all forms of development should be of high-quality design, tall buildings by their nature have an impact on the wider London skyline. It is important that they enhance the overall appearance of the Cluster on the skyline while also having a successful relationship with the space around them at ground level and with particular regard to the Tower of London World Heritage Site. The Renewal Opportunity Sites have potential to accommodate an uplift in floorspace in new buildings of

an appropriate design and height. The City Corporation will continue to use 3D modelling of the Cluster to understand opportunities for redevelopment.

- 7.6.6. The intensification of development will have cumulative environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of pavement and public open space around the building, to ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.
- 7.6.7. The City Corporation is working with businesses and stakeholders to address the challenges facing the City Cluster. During the Plan period improvements to key streets and spaces will create a better connected and more interesting pedestrian experience. Proposals include timed or permanent closures of certain streets to create a pedestrian priority core, wider pavements and improved crossings, which would enable consequential public realm improvements such as more greenery and space for cultural and seasonal events. The City Corporation's City Cluster Vision provides further details about these proposals, including an indication of potential design proposals.
- 7.6.8. Area-wide security measures will be implemented, including the Anti-Terrorism Traffic Regulation Order, to reduce the risks associated with high-profile buildings and increasingly crowded streets. Developers will be required to contribute towards the design and implementation of area-wide security through s106 planning obligations proportionate to the scale of the development. Area-wide approaches to servicing and deliveries will be promoted, for instance the use of physical and/or virtual consolidation measures.
- 7.6.9. Active frontages and complementary land uses will be encouraged to enhance vibrancy and viability, extending to weekends to diversify the City, its economy and community.

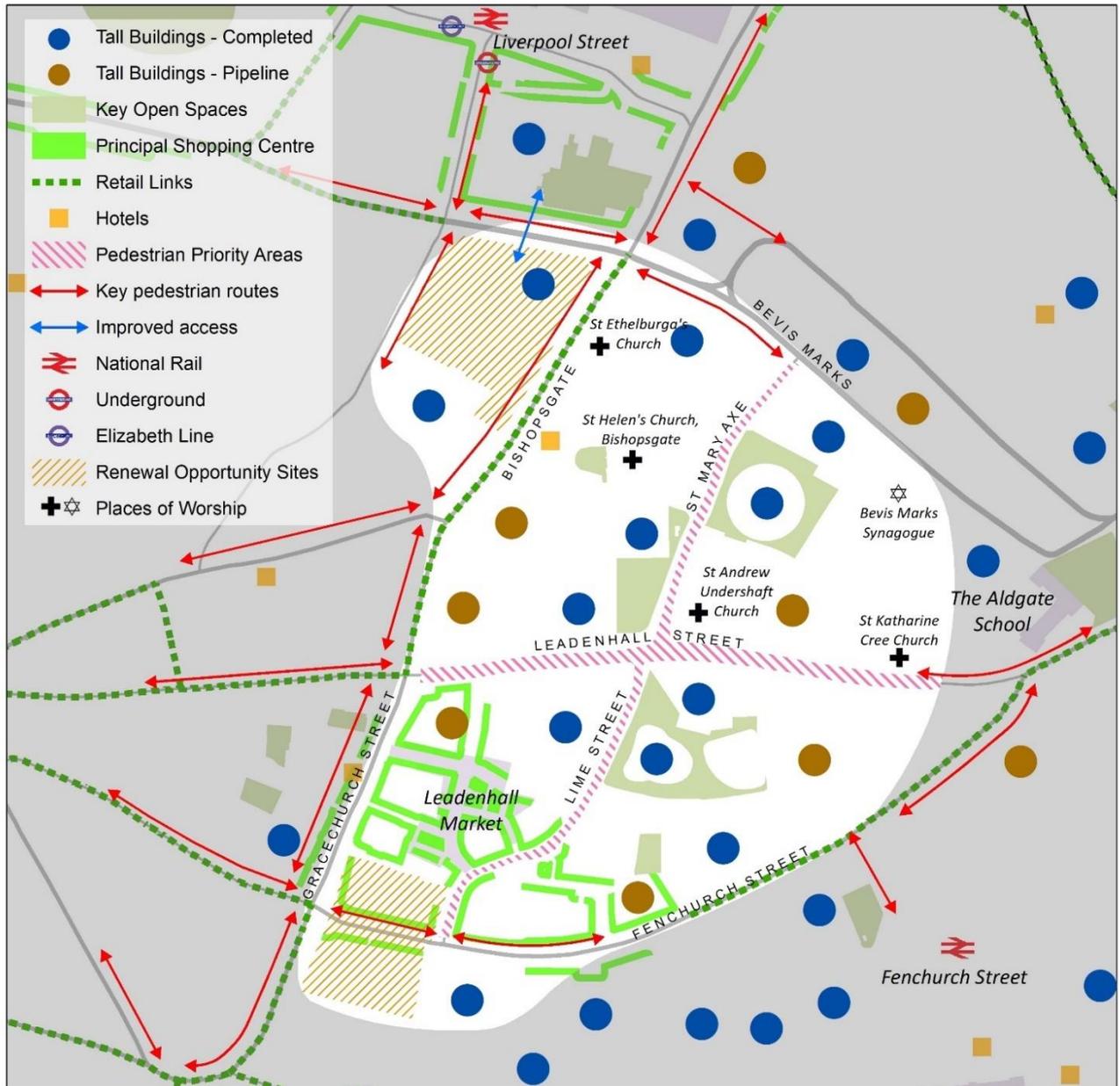


Figure 33: City Cluster Key Area of Change

## 7.7. Fleet Street and Ludgate Key Area of Change

### Context

- 7.7.1. The Fleet Street area is the former home of the press but has changed in character as the newspaper and publishing industries moved away. The western extent of the area comprises the legal precincts of the Inner and Middle Temples and adjoins the Royal Courts of Justice in the City of Westminster. Fleet Street is a Principal Shopping Centre (PSC) with retail frontage along its extent, although most units are small and cater principally for the lunchtime market. The street forms the spine of the Fleet Street Conservation Area and has numerous listed buildings.
- 7.7.2. The St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the Cathedral. Protecting and enhancing this heritage and views of St Paul's Cathedral will be a key consideration guiding future change. Fleet Street, Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London, providing iconic views of St Paul's Cathedral. Fleet Street, Ludgate Circus and Ludgate Hill are heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.
- 7.7.3. Significant occupational change presents an opportunity to promote renewal of the area through appropriate development or refurbishment of key buildings and to improve links north and south of Fleet Street to Holborn and the River Thames. The City Corporation, in partnership with the Ministry of Justice, is developing proposals for a new court building and police facilities in the area which will complement the legal cluster and stimulate further investment in this area.
- 7.7.4. Junction improvements at Ludgate Circus will deliver a safer pedestrian and cycling environment. Recent major development on Ludgate Hill, together with new hotel provision, has enhanced the retail offer and the quality of commercial and visitor accommodation.

### **Strategic Policy S22: Fleet Street and Ludgate**

The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by:

1. Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.
2. Developing new court facilities and City of London Police station, having regard to the impact of the development on the Fleet Street Conservation Area and heritage assets and the need to ensure security of the buildings for court and police use.

3. Continuing to protect existing office use in the area, whilst encouraging office-led redevelopments with a mix of complementary retail, leisure and cultural uses which enhance the area's rich heritage and culture.
4. Providing flexible spaces and complementary uses in appropriate locations.
5. Directing further residential development to appropriate sites off principal streets to reinforce existing residential clusters, ensuring a high quality of residential amenity.
6. Retaining retail provision within the Fleet Street PSC and Retail Link and encouraging extension of retail, leisure and cultural activity into the evening and weekends, whilst retaining a focus on comparison and convenience shopping in the PSC.
7. Enhancing the public realm and open spaces by:
  - improving and increasing the capacity and accessibility of pavements along Fleet Street and Ludgate Hill and junction improvements at Ludgate Circus;
  - enhancing the courts and alleyways that lead off Fleet Street and Ludgate Hill and churchyards that are located in the area;
  - enhancing the immediate setting of St. Paul's Cathedral through high quality development and public realm enhancements; and
  - delivering additional greening on streets and open spaces and encouraging the greening of buildings, where compatible with heritage considerations.

### Reason for the policy

- 7.7.5. Fleet Street is an iconic location with a name synonymous with the UK newspaper and publishing industry. However, the newspapers that occupied Fleet Street have moved out to be replaced with commercial office occupiers. The area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster.
- 7.7.6. The City Corporation in partnership with the Ministry of Justice has proposed a new flagship court facility for London to tackle cybercrime, fraud and economic crime. The proposed new court and police station will need to be consistent with the requirement to protect and enhance heritage assets in the Fleet Street Conservation Area and the protection of retail uses within the Fleet Street PSC, whilst addressing the need for security and secure access.
- 7.7.7. The Fleet Street area has a strong cultural offer with attractions ranging from Dr Johnson's House to the St Bride's Institute, the Bridewell Theatre and the historic churches of St Brides, St Dunstan's in the West and Temple Church. These attractions help draw visitors to the area, which support the PSC.
- 7.7.8. Ludgate Circus is a major junction between Fleet Street, Ludgate Hill and Farringdon Street. The western side lies within the Fleet Street PSC, whilst the

eastern side is within an identified Retail Link. Ludgate Hill forms the principal approach to St Paul's Cathedral and a key element of the royal and state processional route. Major commercial development at Old Bailey has enhanced the office and retail offer on this street and further hotel development could support the City's growing visitor economy.

- 7.7.9. The Key Area of Change contains a mix of large modern office developments and smaller scale historic buildings on small plots more suitable for SME use. Several major occupiers have vacated office buildings on Fleet Street in recent years, providing opportunities for beneficial change though the City-wide presumption in favour of protecting office uses will continue to apply and the area's commercial office focus will remain. Heritage and views constraints may limit opportunities for significant increases in floorspace.
- 7.7.10. There may be potential for partnership working between occupiers in the area to deliver improvements and more flexible use of some buildings whilst retaining a predominance of commercial uses which complement the City's business focus. To assist with the development of a coherent vision for the area, the City Corporation will support the work of the Fleet Street Quarter Partnership in the process to become a Business Improvement District. The Partnership is keen to explore ways in which Fleet Street can act as a vibrant spine for the area, while improving its links with other parts of the City including the area up to High Holborn and access to the riverside.
- 7.7.11. The area contains an existing residential cluster to the north of Fleet Street, with a number of upper floors of buildings on Fleet Street itself converted to residential in recent years. South of Ludgate Hill is the established residential area of Carter Lane. Fleet Street, Ludgate Hill and Carter Lane suffer noise from commercial and retail activities, while traffic contributes to poor air quality along parts of Fleet Street and Ludgate Hill. To ensure a high quality of residential amenity, new residential development in this area will be directed to sites away from principal streets, so that the potential for noise disturbance and exposure to poor air quality can be minimised.
- 7.7.12. The PSC is an important aspect of Fleet Street that provides vibrancy along its length. To strengthen the PSC, it should continue to focus on comparison and convenience shopping, but also look to extend its retail offer into the evenings and weekends. The Retail Link on Ludgate Hill provides a key route between the Fleet Street and Cheapside PSCs and further development for retail and town centre uses is appropriate along this route.
- 7.7.13. The key streets within the area offer a poor public realm, being heavily trafficked with narrow footways that are congested particularly during peak hours and lunch times. There is limited greenery along Fleet Street, Ludgate Circus and Ludgate Hill. Additional planting will need to consider the impact on the established character of the area and on key views of St Paul's Cathedral along the processional route. There is scope to enhance the public realm and achieve a better balance between motor vehicles and pedestrians, including through the widening of pavements. Improvements to the public realm will deliver benefits to the area as well as improve air quality and provide more quiet areas in the

network of courts and alleyways behind Fleet Street and Ludgate Hill. St Bride's Churchyard is one of the largest public spaces in the Fleet Street area and has significant potential for enhancement. Other parts of the area where the public realm and street environment offer scope for improvement include Carter Lane and the Whitefriars area to the south of Fleetbank House.

7.7.14. The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960s. The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and de-cluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral to enhance the setting of this iconic building.

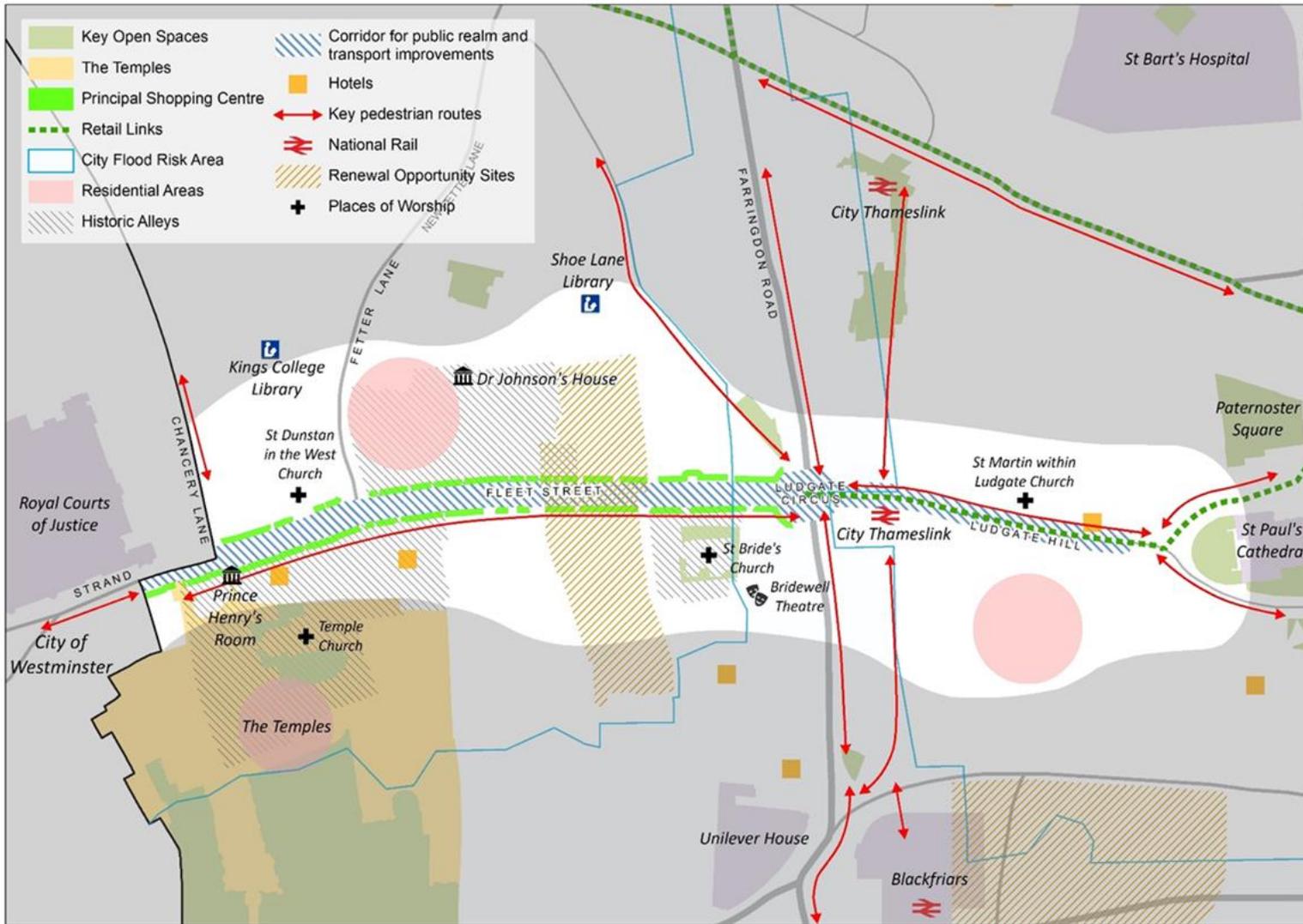


Figure 34: Fleet Street and Ludgate Key Area of Change

## 7.8. Smithfield and Barbican Key Area of Change

### Context

7.8.1. The Smithfield and Barbican Key Area of Change is a vibrant, mixed use area that contains:

- The highest concentration of residential units in the City, including the Barbican and Golden Lane estates and Smithfield (principally Barts Square);
- A cultural quarter, known as Culture Mile, focused on the Barbican and Museum of London, which is recognised in the London Plan as a strategic cultural area;
- St. Bartholomew's Hospital, which is a regional hospital and specialist cardiac and cancer centre.
- Smithfield Market, London's major wholesale meat market.
- A mixed office stock and occupier profile, ranging from large corporate headquarters to buildings suitable for SMEs, creative enterprises and start-ups.
- Many heritage assets of national significance including listed buildings of diverse periods, conservation areas, scheduled ancient monuments and historic parks, gardens and spaces which enhance its special character.

7.8.2. This part of the City will undergo significant change and development over the life of the Local Plan with the delivery of the Culture Mile initiative, including the proposed relocation of the Museum of London to Smithfield and the potential redevelopment of the site of the existing Museum of London.

7.8.3. Smithfield Market may move from its current location in this period and alternative uses would then need to be found for the historic market buildings. Policy S25 supports the continued presence of Smithfield Market in the area in the short to medium term, while providing broad guidance on potential future uses if the Market moves during the Plan period.

7.8.4. The opening of the Elizabeth Line, with a station entrance at Lindsey Street and another on Moorgate, will significantly increase public transport provision to the area and result in increased pedestrian flows to and from these stations, Culture Mile and the rest of the City.

## **Strategic Policy S23: Smithfield and Barbican**

The City Corporation will improve the Smithfield and Barbican area by:

- implementing the Culture Mile initiative, encouraging culture-led mixed-use development and complementary uses and delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy;
- ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;
- ensuring future alternative uses appropriate to the listed status of the-market buildings in Smithfield if the existing uses are relocated;
- supporting and enabling residential development in appropriate locations;
- identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;
- making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;
- seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;
- requiring improvements to pedestrian and cycle routes for all within and through the north of the City;
- supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network; and
- enhancing the special character of the area through sensitive change.

### Reason for the policy

7.8.5. The Smithfield and Barbican area contains a very diverse range of uses, including commercial offices, retail, market, cultural, hospital and residential, which attract large numbers of people to the area. During the life of this Plan, the proposed relocation of the Museum of London from London Wall to Smithfield would release its current site for potential redevelopment. The City Corporation has taken a decision in principle, subject to feasibility and consultation, to co-locate its 3 wholesale markets to a new location which could release the existing Smithfield Market buildings for alternative use. The Culture Mile initiative will see a range of cultural and artistic activities implemented throughout the area. Together these changes will attract

a substantial increase in visitors to this part of the City and enhance the area's attractiveness for businesses, residents and visitors. The opening of the Elizabeth Line, linking to national rail and tube lines, will make this area one of the most accessible locations by public transport in the country, helping deliver the expected increase in visitors.

7.8.6. Delivery of this policy will be supported by implementation of public realm enhancement and transportation schemes and greater activation of streets, providing improved amenity, design and movement, for the benefit of workers, residents and visitors. The design of new buildings and spaces should provide greater pedestrian permeability, ensuring that the area is able to accommodate and manage increased volumes of people and activities. A particular concern in this area is the need to improve air quality to protect the health of the large resident population and hospital patients. The City Corporation's Transport Strategy proposes to introduce a local Zero Emission Zone covering Barbican and Golden Lane by 2022. An interim 2-way Zero Emission Street is being implemented at Beech Street in 2020 under an Experimental Traffic Order.

7.8.7. The Citigen plant located immediately north of the City on Charterhouse Street in Islington, is providing heating and cooling to buildings within the City. Subject to future progress on decarbonisation, Citigen offers the potential of low carbon heating and cooling to buildings in this part of the City and new development should, where feasible, be designed to enable connection to the network.

### **Culture Mile**

7.8.8. Culture Mile is a unique collection of arts, cultural and educational organisations and creative enterprises in the north of the City which has been created through a partnership of the City of London Corporation, the Barbican Arts Centre, Guildhall School of Music and Drama, the London Symphony Orchestra and the Museum of London. Culture Mile runs from Farringdon to Moorgate on the east-west axis and from the Golden Lane estate to south of London Wall on its north-south axis. The Culture Mile area has been identified as a Strategic Cultural Area in the London Plan.

### **Strategic Policy S24: Culture Mile Implementation**

The City Corporation will promote and protect Culture Mile as the City's main cultural centre and world class cultural destination, by encouraging and supporting:

- the proposed relocation of the Museum of London to Smithfield;
- the potential redevelopment of the current site of the Museum of London on London Wall;
- shared working with the London Borough of Islington to ensure the change and development around Culture Mile benefits local communities through improved access to and experience of cultural enrichment, education, skills and employment opportunities;

- provision of cultural facilities and uses within buildings and the public realm, where appropriate, and where the amenity of surrounding uses is not significantly compromised;
- supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;
- encouraging a diverse leisure, retail, food and beverage offer, particularly along the Culture Spine key route;
- encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists;
- strengthening of routes, way finding, lighting and signage throughout the area and the links with the rest of the City in a co-ordinated manner;
- public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile and to provide a relevant identity for Culture Mile; and
- safeguarding cultural uses such as churches and museums.

#### Reason for the policy

7.8.9. Culture Mile has been identified to guide cultural and creative activity within this part of the City, including potential development in the area during the life of the Plan. It recognises and promotes the City's cultural attractions to a wider audience. The opening of Elizabeth Line stations will stimulate further change in the area.

7.8.10. An important element of the emerging proposals for Culture Mile is the identification of movement spines, including a key east-west route from the proposed Museum of London site, along Long Lane and Beech Street. Significant improvements to the public realm and traffic reduction measures, particularly along Beech Street, will be progressed to support increased pedestrian flows and the provision of cultural activity on street. Public realm improvements will be sought as development opportunities arise. Expansion of the area's cultural offer, including within established institutions, will require the provision of appropriate transport infrastructure into and through the area.

7.8.11. To deliver its ambitions for Culture Mile, the City Corporation is aiming to create a distinctive look and feel for the area, which allows for the provision of art installations and activity in the public realm and addresses the requirements for advertising and event promotion. Further planning guidance will be provided.

7.8.12. The City Corporation and partners have published research that highlights the contribution made by creative industries in and around Culture Mile to the City's economy and the potential for growth of this sector as part of the Culture Mile initiative. The research identified the significant social and economic value that

can be derived from the growth of creative enterprises and made four key recommendations which are addressed in part through this policy:

- Create a strong sense of place;
- Secure the area's distinctive ecology, including encouraging investment in the creative sector, developing new creative workspaces and protecting and encouraging formal and informal performance space;
- Attract talent, create new jobs and support social mobility; and
- Drive inward investment.

### **Policy SB1: Culture Mile Impacts**

The City Corporation will protect the amenity of residents, workers and occupiers and conserve and enhance the character of designated and non-designated heritage assets by:

- considering the impact of noise-generating uses, particularly night-time activities on residents and business occupiers when granting planning permissions;
- requiring the installation of noise mitigation measures in developments and spaces to minimise the potential for disruption and anti-social behaviour where appropriate;
- managing the highway network to minimise traffic disturbance and to maintain access to existing premises for essential servicing;
- requiring development and cultural activities to preserve and enhance historic buildings and their settings, historic structures and spaces and conservation areas;
- allowing suitable architectural lighting of buildings and spaces, consistent with their architectural, cultural and heritage status, the amenity of occupiers and the requirements of Culture Mile; and
- ensuring public realm and open space improvements, and temporary and pop-up stalls and events do not impede the efficient flow of people and essential vehicles or detrimentally impact on the conservation area.

#### Reason for the policy

7.8.13. Culture Mile will be a vibrant place with large numbers of people and significant activity during the day and into the evening. This level of activity will impact on residents and workers as well as the movement of people and traffic and therefore a range of mitigation measures need to be considered alongside project implementation.

7.8.14. The London Borough of Islington has designated the Clerkenwell and Farringdon area as a Cultural Quarter, where development of cultural and

creative uses should be focused. It also proposes introducing a new Local Shopping Area extending from Farringdon Station to Smithfield Market along Cowcross Street, which will support development of retail and food, drink and entertainment uses. While these initiatives will complement the Culture Mile, cross-boundary impacts may arise from cultural and night-time economy uses on either side of the boundary between the City and Islington. Proposals for such uses in Culture Mile will be expected to mitigate any cross-boundary impacts as well as any impacts on City residents and businesses.

7.8.15. Policy S9 (Vehicular Transport and Servicing) addresses disturbance from vehicle movements as well as disruption to servicing arrangements. Policies HL3 (Noise and Light Pollution) and CV4 (Evening and Night-Time Economy) outline measures to help protect residents from noise and light disturbance and the night-time economy. Further guidance is provided in the City Corporation's Noise Strategy, Lighting Strategy and Statement of Licencing Policy.

### **Smithfield**

7.8.16. The Smithfield area has over centuries developed a distinctive mixed-use character and townscape and contains the designated Smithfield Conservation Area and numerous important listed buildings. It is characterised by the wholesale Smithfield Market, the General Market and St Bartholomew's Hospital complex. The hospital is a leading internationally renowned teaching hospital and centre for excellence which includes specialist cardiac and heart centres. The Smithfield area also supports a range of other land uses, including residential, offices, retail, leisure, churches and night-time entertainment. The City Corporation has taken a decision in principle to co-locate its three wholesale markets on a single site and it is possible that Smithfield Market will relocate to this new wholesale market site during the Plan period. Smithfield is home to a significant number of cultural organisations and creative enterprises with links to Camden and Islington.

### **Strategic Policy S25: Smithfield**

The City Corporation will protect and enhance the distinctive mixed-use and historic character of Smithfield by:

- supporting the continued presence of St. Bartholomew's Hospital;
- supporting the continued presence of Smithfield Market in the short to medium term;
- encouraging the future sensitive re-use of the Smithfield Market buildings, should the market relocate, requiring a world class design solution which delivers a mix of uses appropriate to its sensitive heritage character;
- supporting the proposed relocation of the Museum of London to Smithfield;

- further enhancing the distinctive character of the Smithfield area by retaining existing buildings, and encouraging appropriate new development, suitable for accommodating a mix of uses;
- managing the particular challenges which result from the late evening, 7 day a week character of the area;
- ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents; and
- providing for, and supporting, improved pedestrian permeability and the creation of new and enhanced public realm across the area to accommodate cultural activity and increased pedestrian flows arising from the Elizabeth Line and potential new uses in the existing market buildings.

#### Reason for the policy

7.8.17. The proposed relocation of the Museum of London to Smithfield, the opening of the Elizabeth Line and development of Culture Mile activities, will result in a significant increase in pedestrian and visitor numbers which will place further pressure on the public realm. Improvements to the public realm will be required to ensure that increased movement can be accommodated. At the same time, it is important that new activities do not adversely affect the amenity of existing business and residents, the continued operation of St Bartholomew's Hospital or impact on the area's historic significance and mixed-use character.

7.8.18. The City Corporation has carried out a strategic review of its 3 wholesale markets, Smithfield, Billingsgate and New Spitalfields. A decision has been taken in principle, subject to feasibility and consultation, to co-locate the wholesale markets on a single site. As a result, it is possible that Smithfield Market may move from its current location in the City at some time in the latter part of the Plan period. The Local Plan therefore continues to protect the operation of the Market in Smithfield, but also provides guidance requiring future potential uses of the market buildings to maintain the historic character of the existing Grade II\* and Grade II listed market buildings. Future uses should ensure the legacy of these buildings through world class design and innovation which supports the growing evening and weekend economy, complements the City Corporation's aspirations for Culture Mile and is fully inclusive whilst protecting local amenity. If the decision in principle to co-locate the wholesale markets on a new site is confirmed, then a planning brief or Masterplan Supplementary Planning Document will be prepared setting out further guidance on potential future uses for the Smithfield Market buildings.

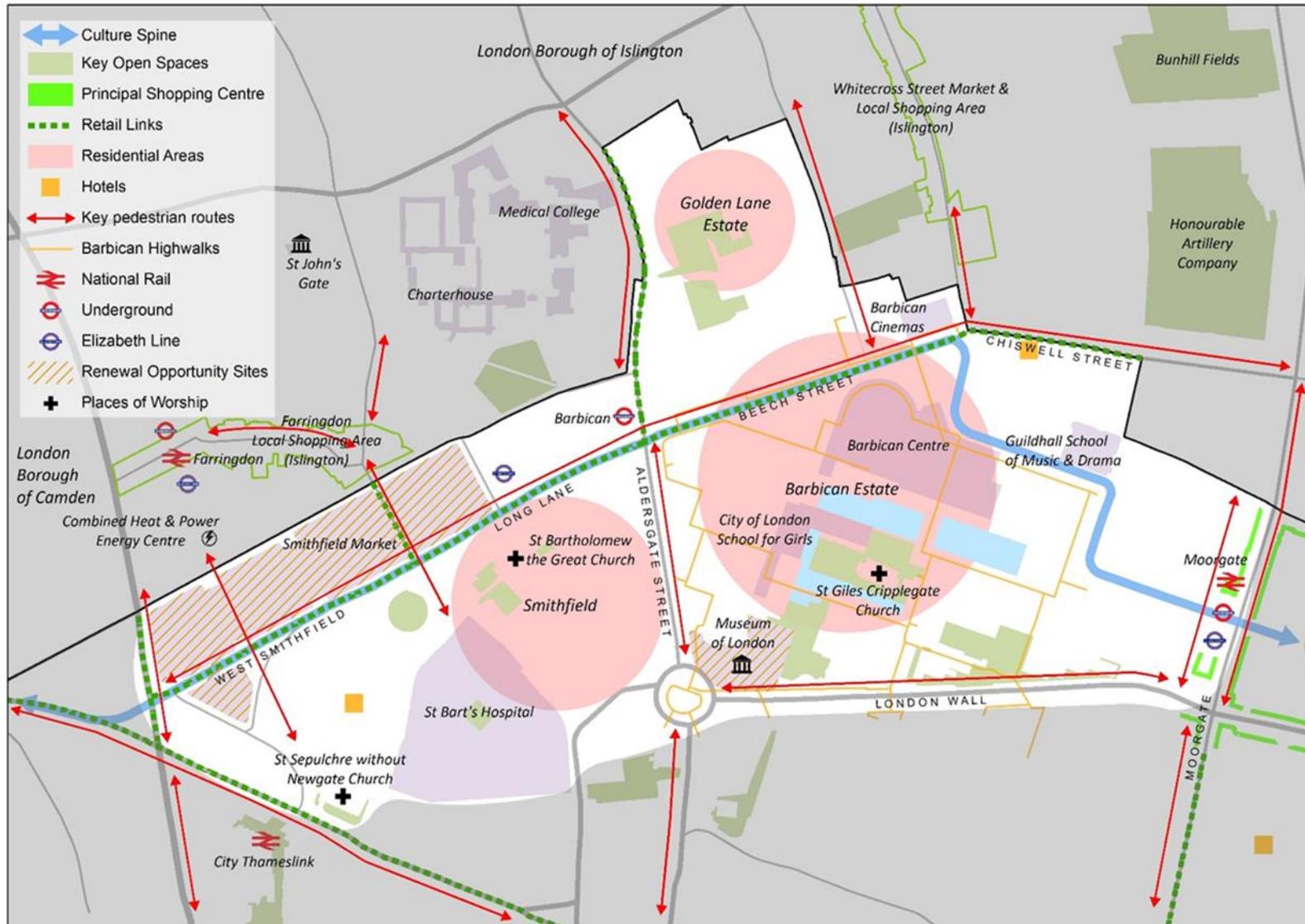


Figure 35: Smithfield and Barbican Key Area of Change

## 7.9. Liverpool Street Key Area of Change

### Context

7.9.1. The Liverpool Street area stretches from the City boundary with Shoreditch in the north east, to Finsbury Circus in the west and the City Cluster to the south. It provides a key route from Liverpool Street Station to the Barbican and Culture Mile. It is an area that will experience extensive change with the opening of the Elizabeth Line and the completion of significant new office floorspace and retail and leisure facilities which are currently under construction or progressing through the planning process.

7.9.2. Liverpool Street is the gateway to the City for East Anglia – as well as being a multi-line tube station. The Elizabeth Line will provide fast, easy access from the west including from the West End, Heathrow and beyond, linked to Moorgate station which already serves stations to the north of London. The increase in passengers and pedestrians in this area facilitated by the Elizabeth Line brings challenges and opportunities: challenges in terms of additional people on already heavily used streets; opportunities in terms of increased accessibility for businesses and greater demand for the growing retail and leisure sector.

7.9.3. The area is a gateway to 'Tech City' focussed on Old Street, Shoreditch and Spitalfields, and there are further opportunities to develop tech-related activity in the City and its fringes. Facilitating office space suitable for such businesses - affordable, collaborative, and available for short periods - will enhance the local office eco-system and strengthen the City's reputation as a centre for incubators, start-ups and the tech and Fintech sectors. Links could be further developed between the creativity of the Culture Mile and Tech City, enhancing the creative eco-system.

### Strategic Policy S26: Liverpool Street

The City Corporation will enhance the Moorgate-Liverpool Street area to take advantage of the opportunities presented by good public transport accessibility, the opening of the Elizabeth Line, and restoration of Finsbury Circus and the redevelopment and refurbishment of Broadgate by:

- accommodating the increased footfall by maintaining and enhancing walking routes within, to and from the area, including routes to the City Cluster, and improving wayfinding;
- providing active frontages and clear signposting that reflects the area's position as a gateway to the Culture Mile;
- encouraging the development of flexible and collaborative office space to meet the needs of potential start-ups, business growth and the development of the tech and fintech eco-system;

- facilitating linkages between business, the creative sector and educational institutions;
- supporting additional retail provision in the Moorgate/Liverpool Street Principal Shopping Centre and encouraging the extension of retail and leisure activities into the evenings and weekends, while managing the potential impacts associated with the night-time economy;
- enhancing the public realm and walking routes to Petticoat Lane Market, working in partnership with the London Borough of Tower Hamlets, and the links to Whitecross Street and Spitalfields markets;
- delivering a high-quality public realm with additional publicly accessible open space and increased greenery;
- supporting improvements to the accessibility and capacity of Liverpool Street Station, including enhancing step free access and improving entry points; and
- improving the safety and capacity of pedestrian routes around Moorgate and Liverpool Street Elizabeth Line stations, and between the stations and key destinations, including Culture Mile, Tech City and the City Cluster.

#### Reason for the policy

7.9.4. The Liverpool Street area is undergoing significant transformation through redevelopment and refurbishment of Broadgate, provision of more retail floorspace and improvements in surrounding streets, the opening of the Elizabeth Line and significant intensification in the City Cluster to the south. These changes are bringing greater footfall, greater vibrancy and activity seven days a week, enhancing the desirability of the area as a business, retail and leisure destination. The Moorgate/Liverpool Street Principal Shopping Centre has potential to accommodate significant growth of retail provision during the Plan period. Broadgate is currently developing a more ‘outward looking’ character and this is expected to continue, alongside further improvements to permeability.

7.9.5. Where suitable funding is available, the City Corporation will support such change through delivery of world class public realm and improvement to streets and pedestrian routes, including additional pedestrian priority and new pedestrian routes to maximise permeability, where appropriate. The Transport Strategy indicates that the area around Moorgate and Liverpool Street stations will be prioritised for improvements, together with the routes between these stations and key destinations such as Culture Mile and the City Cluster. Where feasible, additional urban greening and the creation of green urban spaces will be encouraged.

7.9.6. The City Corporation will work with relevant partners such as TfL, Network Rail and train operators to promote improvements to the accessibility and facilities of Liverpool Street Station. This may include enhancing step free access,

improving entry points and reviewing bus interchange, together with any potential future improvements to operational capacity at the station.

7.9.7. Alongside these changes, encouragement will be given to the provision of space suitable for incubators, start-ups, technology-based companies and creative industries, including the provision of flexible accommodation suitable for these sectors and growing businesses. This will reinforce established links between the area and the Old Street/Shoreditch/Spitalfields 'Tech City' and will exploit the opportunities presented by Culture Mile to enhance the creative ecology of this part of the City. Collaboration will be encouraged between creative industries in Culture Mile and emerging tech industries.



Figure 36: Liverpool Street Key Area of Change

# 8. Implementation

## 8.1. Planning Contributions

### Community Infrastructure Levy (CIL)

8.1.1. The 2008 Planning Act and Community Infrastructure Levy Regulations 2010 (as amended) set out the legislative and regulatory basis for the CIL. They provide for the setting and collection of a statutory charge levied on development, intended to address the infrastructure needs arising out of the implementation of the Local Plan. CIL is the primary mechanism for seeking contributions from developers towards the provision of new infrastructure. Infrastructure is defined broadly in the Act to include transport, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces.

### Planning Obligations

8.1.2. CIL Regulations indicate that planning obligations may only constitute a reason for granting permission if the planning obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

8.1.3. Planning obligations are legal agreements linked to planning permissions that regulate the way a development is undertaken, and they are used where it is not possible to regulate the permission by means of a condition. They may be in the form of in-kind benefits or a financial contribution and may be used to prescribe the nature of a development, compensate for loss or damage created by a development, or mitigate the impacts associated with the development. The level of any obligation is subject to consideration of its impact on the viability of the development proposed.

### Strategic Policy S27: Planning Contributions

The City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development:

1. Requiring contributions through the Community Infrastructure Levy to:
  - assist in the delivery of the infrastructure necessary to support implementation of the Local Plan and the City's Transport Strategy; and
  - contribute towards the costs of Crossrail, or other strategic infrastructure, in accordance with the provisions of the Mayor of London Community Infrastructure Levy 2.

2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
  - site specific mitigation meeting statutory tests;
  - affordable housing;
  - training, skills and job brokerage;
  - carbon offsetting;
  - local procurement in the City and neighbouring boroughs; and
  - measures to enhance area-wide security, where appropriate.
3. Use of the Vacant Building Credit is not considered to be appropriate in the City of London.

#### Reason for the policy

8.1.4. The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL) to help local infrastructure keep pace with the demands of development and attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to ensure proposals are acceptable.

#### How the policy works

8.1.5. The City Corporation has adopted a CIL Charging Schedule and will prepare an Infrastructure Funding Statement setting out the types of infrastructure or infrastructure projects that may be funded in part or in whole by CIL.

8.1.6. In line with legislative and regulatory requirements, and the provisions of the City Corporation's CIL, planning obligations in the City will be sought for site specific mitigation, including contributions towards area-wide security measures in the City Cluster, in line with the policies set out in this Plan. Planning obligations will also be negotiated to deliver affordable housing, the provision of training and skills programmes and carbon offsetting. Specific requirements are set out in other policies within this Plan, particularly Policies S1, S3 and DE1. Planning obligations in the City are sought principally from commercial development, but other forms of development will also be expected to make contributions, where appropriate. Affordable housing will be required on-site on qualifying residential developments, but exceptionally financial contributions will be sought. Financial contributions towards affordable housing will be sought from commercial development.

8.1.7. Where required, the City Corporation will seek, via s106 planning obligations, Section 278 Agreements with developers to ensure that highway works necessary to make a development acceptable are funded by the developer and implemented by the highway authority.

8.1.8. Further detail on planning obligations is set out in the Planning Obligations Supplementary Planning Document and in the s106 Standard Template which is published on the City Corporation's website.

8.1.9. The Vacant Building Credit is set out in national planning policy and is intended to provide an incentive to bring forward brownfield sites for development. The high cost of land in the City of London, together with high levels of demand for commercial and residential development, mean that additional incentives are not required to encourage brownfield sites to come forward for development. The use of Vacant Building Credit is therefore not considered to be appropriate within the City of London.

### **Crossrail**

8.1.10. The Mayor of London Community Infrastructure Levy 2 (CIL2) was implemented from 1 April 2019. It requires development across London to make a contribution towards the funding of Crossrail 1 and Crossrail 2. The Mayor's CIL2 sets a charging rate for all development in London, with a higher charging rate for office, retail and hotel development in Central London, including in the City of London. The Mayor's CIL2 is payable in addition to the City of London CIL.

### **Policy PC1: Viability Assessments**

1. Development proposals must take full account of the policy requirements set out in this Plan and the London Plan, including financial and other requirements under the Mayoral and City of London Community Infrastructure Levy and s106 planning obligations.
2. Exceptionally, even where policy requirements have been taken into account, applicants may consider that these requirements cannot be delivered in full without adversely affecting the overall viability of a development. In these circumstances, proposals must be supported by a scheme specific viability assessment.
3. The viability assessment must be prepared in accordance with the standard methodology set out in national planning practice guidance. The price paid for a site and/or building will not be a relevant justification for not meeting Development Plan requirements.
4. Viability assessments will be made available on the Planning Register reflecting the expectation that these should be publicly available. If the applicant considers that the assessment in part or whole should be redacted for reasons of confidentiality, there will be an opportunity for the applicant to make the case. If an assessment is redacted, an executive summary will be made public.
5. The City Corporation will seek independent verification of submitted viability assessments, with the cost of verification being met by the applicant.
6. Where it is agreed that a development cannot viably deliver all required planning obligations at the date of permission, but that there are nevertheless other policy

considerations which justify the approval of planning permission, the City Corporation will normally require a review of the viability information at a later stage of the development, or upon occupation.

#### Reason for the policy

8.1.11. Delivery of the Local Plan and the London Plan requires developers to make contributions towards infrastructure and affordable housing provision through the CIL and s106 planning obligations. Developers must take into account the full cost of meeting development plan requirements when purchasing sites or buildings and in the design of schemes. A whole plan viability assessment has been undertaken in the preparation of this Plan demonstrating that as at March 2020 implementation of the policies should not adversely impact on the viability of development in the City of London. Exceptionally, there may be circumstances where a developer considers that meeting development plan requirements in full cannot be delivered without adversely impacting on the viability of a development. In such circumstances, the City Corporation will require a site-specific viability assessment to be submitted in support of the proposed lower level of contributions.

#### How the policy works

8.1.12. Where viability assessments are submitted in support of planning applications, these must be prepared in accordance with the Government's recommended approach to viability assessments set out in national Planning Practice Guidance. In particular, assessments must demonstrate that the values assumed for sites and/or buildings fully reflect the planning policy requirements set out in the Local Plan and the London Plan. The actual price paid for land will not be a relevant justification for failing to meet the policies in the development plan.

8.1.13. The City Corporation will review viability assessments against the requirements in the Local Plan and London Plan and, where necessary, will seek independent verification of submitted assessments from suitably qualified consultants who have experience of the development market in central London. Verification of viability assessments will consider whether appropriate costs, values and risk rates have been utilised which reflect the ambitions of this Plan. The City Corporation will expect the applicant to meet the full cost of this independent verification.

8.1.14. The City Corporation will make all viability assessments submitted, together with any verification reports, available publicly via the Planning Register on the City Corporation's website. If a developer considers that the viability assessment should remain confidential in whole or in part, they should provide justification to the City Corporation outlining the potential harm that could occur from making the relevant information public. The City Corporation will consider whether the public interest in maintaining confidentiality outweighs the public interest in making the viability assessment public. Where the City Corporation considers that an assessment should remain confidential in whole, or in part, it will keep

the justification under review, including taking account of whether information should remain confidential with the passage of time from initial submission.

8.1.15. Where the City Corporation agrees that a development cannot meet the full policy requirements for CIL and s106 planning obligations at the date of commencement, but that there are other policy considerations which would nevertheless justify approval of the scheme despite this non-compliance, the Corporation will normally require that a review mechanism be included within any s106 planning obligation, with a review of the viability information required at a later stage in the development, or upon occupation. In determining the appropriate mechanism, the City Corporation will have regard to national Planning Practice Guidance, the London Plan and the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance. Where a development is proposed to be undertaken in phases, the City Corporation will normally require a review of the viability prior to the commencement of each phase of the development.

8.1.16. Policy S3 Housing requires the use of upwards only review mechanisms in circumstances where the affordable housing targets in that policy are not met.

## **8.2. Monitoring**

8.2.1. The Local Plan was prepared in the context of the most up to date information available. A range of projections and potential future scenarios were considered for each policy area. However, circumstances may change and monitoring of Local Plan policies is essential to determine the extent to which the policies are delivering the Local Plan vision, strategic objectives and spatial strategy.

8.2.2. The City Corporation will prepare and publish at least annually a range of Local Plan monitoring reports, which measure and evaluate progress towards meeting the Plan objectives across a range of policy areas. Policies monitored will include offices; housing; hotels; tall buildings; protected views; sustainability; waste; open spaces and green infrastructure. The City Corporation will also periodically (Annually) review progress against the programme of infrastructure delivery set out in the Infrastructure Delivery Plan.

8.2.3. The City Corporation is required to review the Local Plan at least every five years from the date of adoption to determine whether it needs to be updated. Data and trends identified in the Local Plan monitoring reports may indicate the need for an earlier partial or full review of the adopted Plan. The emergence of new trends resulting from the Covid-19 pandemic and its aftermath will be regularly monitored for their policy implications.

8.2.4. As mentioned in the introduction to this Plan, the Government is pursuing a planning reform agenda which includes proposals to radically change the format and content of local plans. These reforms, if enacted, will be a key factor in determining the timing and scope of the next review of the City of London's Local Plan.

# Appendices and Glossary

# Appendix 1 - Technical note on applying the Urban Greening Factor

The diagram and table show a theoretical square development site (100sq.m) showing how it would be analysed in terms of surface cover and areas of each type.



Figure 1: Diagram of simplified theoretical development site

To calculate a UGF score for any proposed development it is necessary to measure the overall area of the site and then to map and measure the coverage of various surface types within the site. Scores are then assigned to each surface cover and a calculation of the overall green space factor can begin. The score for each surface cover within a site is multiplied by its area. The formula is shown below.

$$\frac{(\text{Score A} \times \text{Area}) + (\text{Score B} \times \text{Area}) + (\text{Score C} \times \text{Area}) + (\text{Score D} \times \text{Area}) \text{ etc.}}{\text{Total Site Area}}$$

The relevant scores for each type of surface cover in the City of London is set out in Table 1 below. Minor adjustments have been made from the original GLA scoring system to encourage certain categories of greening which will deliver significant benefits in the City, particularly tree planting, good quality green roofs (of adequate soil depth) and green walls.

Surface Cover Type	GLA	CoL
Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site	1	1
Wetland or open water (semi-natural; not chlorinated) created on site	1	1
Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – See livingroofs.org for descriptions. <sup>68</sup>	0.8	0.9
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two-thirds of the projected canopy area of the mature tree -see Trees in Hard Landscapes for overview. <sup>69</sup>	0.8	0.9
Extensive green roof with substrate of minimum settled depth 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014. <sup>70</sup>	0.7	0.8
Flower-rich perennial planting – see Centre for Designed Ecology. <sup>71</sup>	0.7	0.7
Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case studies. <sup>72</sup>	0.7	0.7
Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance <sup>73</sup>	0.6	0.6
Standard trees planted in pits with soil volumes less than two thirds less than the projected canopy area of the mature tree.	0.6	0.7
Green wall – modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview. <sup>74</sup>	0.6	0.7
Groundcover planting – see RHS Groundcover Plants for overview <sup>75</sup>	0.5	0.5
Amenity grassland (species-poor, regularly mown lawns)	0.4	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014. <sup>76</sup>	0.3	0.3
Open water (chlorinated) or unplanted detention basins	0.2	0.2
Permeable paving - see CIRIA for overview <sup>77</sup>	0.1	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0	0

**Table 1: Proposed City of London UGF Scores compared with GLA scores in draft London Plan (See Table 9 in Urban Greening Factor Study Report)**

# Appendix 2 – Historic England Advice Note 7 Selection Criteria

This table is taken from Historic England Advice Note 7: Local Heritage Listing, and sets out commonly applied selection criteria for assessing the suitability of heritage assets for local heritage listing.

Criterion	Description
<b>Age</b>	The age of an asset may be an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions.
<b>Rarity</b>	Appropriate for all assets, as judged against local characteristics
<b>Aesthetic Interest</b>	The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics.
<b>Group Value</b>	Groupings of assets with a clear visual design or historic relationship.
<b>Archaeological Interest</b>	The local heritage asset may provide evidence about past human activity in the locality, which may be archaeological – that is in the form of buried remains – but may also be revealed in the structure of buildings or in a manmade landscape. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
<b>Archival Interest</b>	The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record.
<b>Historical Association</b>	The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures. <b>Blue Plaque</b> and other similar schemes may be relevant.
<b>Designed Landscape Interest</b>	The interest attached to locally important historic designed landscapes, parks and gardens which may relate to their design or social history. This may complement a <b>local green space designation</b> , which provides special protection against development for green areas of particular importance to local communities for their current use.
<b>Landmark Status</b>	An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene.
<b>Social and Communal Value</b>	Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence, sometimes residing in intangible aspects of heritage, contributing to the 'collective memory' of a place.

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Table 2: Commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list (source: Historic England)

# Glossary

Explanation of terms used in the City of London Local Plan.

\* Terms explained elsewhere in the glossary are marked with an asterisk.

## **Accelerator office space**

An office location which provides mentorship, advice, and resources to help start-ups succeed and grow rapidly, normally let on a short-term basis.

## **Affordable housing**

Affordable housing is defined primarily by affordability and not by tenure. It comprises 'social rented housing', 'affordable rented housing' and 'intermediate housing', provided to eligible households whose needs are not met by the market. Social rented housing is at rents no greater than target rents set by government for local authority, Registered Social Landlords\* (RSL) and cooperative tenants. Affordable rented housing has the same characteristics as social housing but is offered at up to 80% of local market rentals (including service charges, where applicable).

Intermediate housing is housing for sale and rent where costs are above target rents for social rented housing but are at least 20% below local market levels and are affordable by households on moderate incomes. Intermediate housing can include shared equity (shared ownership and equity loans), starter homes, discounted market sales housing and other sub-market rented and key worker provision.

## **Affordable workspace**

Workspace that is provided at rents maintained below the market rate for that space for a special social, cultural, or economic development purpose.

## **Agent of Change**

The principle that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.

## **Air Quality Impact Assessment**

An assessment of the impact of a development on the levels of certain pollutants in the local area, which could include: a description of baseline conditions and how these could change; relevant air quality concerns; the assessment methods to be adopted and any requirements around verification of modelling air quality; sensitive locations; the basis for assessing impact and determining the significance of an impact; construction phase impact; and/or acceptable mitigation measures.

## **Air Quality Neutral**

Assessment of air quality against benchmarks set by the Mayor of London through his Sustainable Design and Construction SPD 2014. Developments that do not exceed these benchmarks will be considered to avoid any increase in NO<sub>x</sub> and PM emissions across London as a whole and therefore be 'air quality neutral'.

## **Apart-hotel**

Accommodation for short or medium-term stays that generally provide more amenities for daily use (such as a small kitchenette) than standard hotel accommodation. They have a reception area where customers can access services without pre-booking and are available on a nightly basis without a deposit being required against damages.

## **Biodiverse green roofs**

A biodiverse green roof should include a varied substrate depth, planted and or seeded with a wide range of wildflowers (sedums can be added). A biodiverse green roof should have a sufficient depth of between 80 - 150mm.

## **Biodiversity**

The variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

## **Biodiversity Action Plan**

The Biodiversity Action Plan (BAP) provides a framework to ensure all legislative requirements relating to the management of green spaces are taken into consideration at all times and both identifies and prioritises actions for biodiversity at a local level.

## **BREEAM assessment**

The Building Research Establishment Environmental Assessment Method (BREEAM) is a sustainability assessment method that sets standards for the environmental performance of buildings through the design, specification, construction and operation phases and can be applied to new developments or refurbishment schemes. It focuses on sustainable value across range of categories: energy; land use and ecology; water; health and wellbeing; pollution; transport; materials; waste; management.

## **Build to Rent**

Homes built specifically for private renting rather than for sale which meet criteria set out in Policy H11 Build to Rent in the Publication London Plan, December 2020.

## **Business Eco-System**

A network of organisations, including suppliers, distributors, customers, competitors and government agencies, involved in the delivery of a specific product or service.

## **Business Improvement District**

A defined area in which a levy is charged on all business rate payers in addition to the business rates to develop projects that will benefit businesses in the local area.

## **Cash in lieu / commuted sums**

Payments of money received from developers instead of the provision of affordable residential units in the City of London. The money is pooled and used by the City Corporation when opportunities to develop affordable housing arise.

## **CAZ - Central Activities Zone**

The area defined in the London Plan\* where planning policy promotes financial and business services, specialist retailing, tourist and cultural uses and activities. The City is wholly within the CAZ.

## **Changing Places toilets**

These meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide the right equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and carer, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.

## **Circular economy**

An economy which keeps resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life.

## **City Flood Risk Area**

Area of the City which is susceptible to flooding from the River Thames, surface water or the sewer network.

## **CIL - Community Infrastructure Levy**

A statutory charge on new development used to contribute towards the funding of infrastructure provision. The City Corporation has prepared a CIL charging schedule that was implemented in July 2014.

## **Comparison goods**

Comparison goods are those bought relatively infrequently, so consumers usually compare prices, features and quality before making a purchase. They may include items such as clothes, electrical items, household and leisure goods.

## **CAAC - Conservation Area Advisory Committee**

A consultative group set up to advise on planning applications and other proposals in the City's conservation areas.

## **Construction Logistics Plan**

A travel plan that aims to improve the sustainability of construction freight movements by establishing site management and procurement processes to reduce the impact of construction traffic on the street network.

## **Creative enterprises / Creative industries**

Defined by the Department for Digital, Culture, Media and Sport\* as those industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property. They include architecture; advertising & marketing; crafts, product, graphic & fashion design; film, TV, radio and photography; IT, software & computer services; museums, galleries & libraries; music, performing & visual arts, and publishing.

## **Cultural Plan**

A Cultural Plan is a flexible framework to support the successful incorporation of relevant, enriching and inclusive cultural components within a major development through a step by step process. It is prepared through the development process and the final detail, delivery and ongoing management secured through conditions and/or legal agreement.

## **Culturally significant object**

Objects which people identify and value and which reflect their evolving knowledge, culture, beliefs and traditions.

## **Decentralised energy**

Energy that is generated close to the place where it is used, so that transmission of electricity, heat and other energy carriers are minimised.

## **Deconstruction**

The act of breaking down a building into components or dismantling - this allows for recycling of the resulting materials. Different to demolition which involves wrecking, destroying or tearing down completely.

## **DSP - Delivery and Servicing Plan**

A plan that shows how a development will proactively manage delivery and servicing arrangements.

## **DCMS - Department for Digital, Culture, Media and Sport**

The government department of state whose responsibilities include recreation, the arts and historic buildings.

## **Design and Access Statement**

A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with.

## **Design Council / CABE**

Advisor to central and local government on good design. It includes the Commission for Architecture and the Built Environment (CABE).

## **Development Management**

The process by which the City Corporation (and, where appropriate, the Mayor of London and Secretary of State) determine applications for planning permission and related consents. Applications are decided in accordance with the development plan\* unless material considerations (including the NPPF\*) indicate otherwise.

## **Development Plan**

The statutory documents that together set out the planning policies for an area. In the City the development plan comprises the Mayor's London Plan\* together with the City's Local Plan\*.

## **DPD - Development Plan Document**

Statutory planning policy document whose preparation process includes public examination. There is one adopted DPD in the City: the Local Plan DPD\*.

## **Embodied carbon**

The total life cycle carbon used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

## **Freight consolidation**

Combining goods shipments into fewer deliveries to reduce the number of freight vehicles required to service a building. This can be achieved through the physical consolidation of goods at an off-site location and/or through methods such as preferred supplier schemes and common procurement strategies.

## **GLA - Greater London Authority**

The GLA comprises the Mayor of London\* (who has an executive role and makes decisions on behalf of the GLA) and a separately elected Assembly (a body of 25 elected Members which has a scrutiny role and is responsible for appointing GLA staff).

## **Green corridors**

Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access routes.

## **Green infrastructure**

A strategically planned, designed and managed network of green spaces and other features vital to the sustainability of any urban area. This includes (although not exclusively) trees, green roofs and walls, green corridors\*, and blue infrastructure such as water spaces and natural drainage features.

## **HRA - Habitats Regulations Assessment**

The purpose of the Habitats Regulations Assessment is to identify any aspects of an emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects), and to identify appropriate avoidance and mitigation strategies where such effects are identified.

There is a legal requirement for all Local Plans to be subject to a HRA, set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats & Species Regulations 2017.

## **HIA - Health Impact Assessment**

A means of assessing the health impacts of policies, plans and projects using quantitative, qualitative and participatory techniques. The HIA of the City Local Plan is incorporated into the Integrated Impact Assessment\*.

## **Heritage asset**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Designated heritage assets include World Heritage Sites\*, Scheduled Monuments, Listed Buildings\*, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest but have not been formally designated.

## **Historic England**

The body responsible for advising the government, local authorities and others on historic buildings and archaeology. It was previously called English Heritage.

## **Hostile vehicle mitigation**

Structural measures that prevent access to, or close proximity of, unscreened vehicles to a building or space, or measures that reduce the speed of vehicles approaching a site or its defences.

## **Housing trajectory**

A projection of the number of new homes expected to be added to the City's housing stock over a given time period.

## **Inclusive design**

Consideration at the design stage to ensure that development makes provision for everyone regardless of disability, age, gender, ethnicity, faith or economic circumstance and addresses the needs of those with mobility difficulties, poor vision and other physical disabilities.

## **Incubator office space**

Dedicated office space aimed at start-ups and normally let for a set period of time.

## **Infrastructure**

Term used to describe the facilities and services necessary for people to live their everyday lives. Infrastructure can take many forms; it can be defined in physical, green and social terms, and can range from strategic provision, such as a new public transport facility or school, to the creation of a local play space.

## **Infrastructure Funding Statement**

Proposed statutory statement reporting on the level of developer contributions received through the Community Infrastructure Levy\* and s106 planning obligations and setting out spending priorities for the next 5 years.

## **IIA - Integrated Impact Assessment**

An assessment process which considers the impacts of policies and proposals within statutory plans against environmental, equality, health, and community safety objectives. The City Plan 2036 IIA comprises three areas of assessment:

- a Sustainability Assessment and Strategic Environmental Assessment - required by EU Directive to assess the social, economic and environmental impacts of new policies;

- an Equality Analysis - related to the City Corporation's duties under the Equalities Act 2010 and the Crime and Disorder Act 1998, and assessing the impact of new policies on people of different ethnicities;
- a Health Impact Assessment\*.

The IIA seeks to assess the impact of the draft City Plan 2036 and its alternatives and identify any potential unintended consequences of its implementation.

### **Listed building**

A building or structure protected because of its historic or architectural interest. The list of such buildings is drawn up by Historic England\* and the Department for Digital, Culture, Media and Sport\*.

### **LDD - Local Development Document**

Documents containing policies and guidance, comprising Development Plan Documents\*, Supplementary Planning Documents\* and the Statement of Community Involvement\*.

### **LDS - Local Development Scheme**

Timetable and project plan for producing the Local Plan\*. It is regularly updated.

### **LIP - Local Implementation Plan**

Statutory transport plan produced by London Boroughs and the City Corporation bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

### **Local Plan**

Document setting out the strategy, vision and policies and proposals for planning the City.

### **London Plan (Spatial Development Strategy)**

Prepared by the Mayor of London\*, it provides a London-wide planning strategy and the City's Local Plan\* must generally conform to it.

### **LVMF - London View Management Framework**

Guidance by the Mayor of London\* on the protection of important views, including those of St Paul's Cathedral and the Tower of London.

### **Major development**

Residential development of 10 or more dwellings or on a site of 0.5 hectares or more, and all other development of 1,000 square metres gross or more floorspace, or on a site of 1 hectare or more.

## **Mayor of London**

The Mayor is the executive head of the Greater London Authority\* and is also responsible for a number of related organisations, including Transport for London\*, Homes for London Board and the Metropolitan Police Authority. The Mayor prepares London-wide strategies, including those for planning (the London Plan\*), transport, waste, energy, economic development, housing and air quality. He has powers to direct decisions on large planning applications.

## **Meanwhile use**

A use which is to last for a limited time, or one which is limited in its operation for a particular period of time. Meanwhile is defined as at or during the same time, while something else is being done.

## **MHCLG - Ministry of Housing, Communities and Local Government**

The government department of state whose responsibilities include town planning.

## **Municipal waste**

Waste collected by a local authority, including domestic waste and street cleansing waste. It also includes commercial waste collected by the authority, although waste producers may also have this privately collected.

## **NPPF - National Planning Policy Framework**

The government's statement of planning guidance to local planning authorities, issued by the Department of Communities and Local Government\*. The latest version was published in February 2019. The City Corporation must take account of it in preparing and implementing its planning policies.

## **Noise assessment**

A technical assessment which identifies whether the overall effect of the noise exposure of a building (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation:

Significant observed adverse effect level: the level of noise exposure above which significant adverse effects on health and quality of life occur.

Lowest observed adverse effect level: the level of noise exposure above which adverse effects on health and quality of life can be detected.

## **Offsetting measures**

The measures permitted for dealing with residual emissions remaining after taking account of energy efficiency and decentralised and low carbon energy sources e.g. retrofitting works undertaken by a developer to improve the energy efficiency of existing buildings in the vicinity of the development; export of low carbon heat from

the development to other developments; or investment in low carbon community heat infrastructure.

### **Open space**

Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

### **Permitted development rights**

A national grant of planning permission which allows certain building works and change of use to be carried out without having to secure planning permission.

### **Pipe subway**

Tunnels, mainly under streets, that accommodate utilities such as gas and water pipes and electricity and telecommunications cables, providing a more efficient alternative to burying these in the ground.

### **Planning obligations / s106 agreements**

Legal agreements negotiated between the City Corporation and developers (or offered unilaterally by developers) setting out financial and non-financial undertakings to mitigate the direct impact of development. Also known as section 106 Agreements, or s106 planning obligations. From July 2014 some financial planning obligations in the City have been replaced by the Community Infrastructure Levy\*.

### **PPG - Planning Practice Guidance**

An online resource which brings together national guidance on various topics in one place and explains the policies in the National Planning Policy Framework (NPPF)\* in more detail.

### **Policies Map**

A map accompanying the Local Plan\* showing where its policies apply to specific locations.

### **PSC - Principal Shopping Centre**

Significant clusters of retail activity within the City of London, which are the local expression of the London Plan's CAZ Retail Clusters. There are 4 PSCs within the City of London: Cheapside, Moorgate/Liverpool Street, Leadenhall Market and Fleet Street.

### **Public Examination**

The Local Plan\* will be subject to public examination before an independent planning inspector. The inspector assesses the "soundness" of the Local Plan.

**Public realm**

Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

**Registered Provider**

Not for profit providers of affordable\* and other social housing, including housing associations and regulated by Government.

**Renewal Opportunity Sites**

Principal opportunities for accommodating large scale development, which may include refurbishment or redevelopment of existing buildings.

**Residential amenity**

The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.

**Retail Impact Assessment**

An assessment undertaken for an application for retail use on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

**Safeguarded wharves**

Sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes. A list of those sites that are currently protected and those proposed for protection is available in 'Safeguarded Wharves on the River Thames', GLA, 2005.

**Safer City Partnership**

A partnership, comprising representatives from a range of City interests, whose aim is to reduce the level of crime, disorder, antisocial behaviour, terrorism and substance misuse in the City.

**Secured by Design**

A crime prevention initiative, to encourage those involved in the development industry to adopt crime prevention measures to assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment.

**Short term residential letting**

Letting of residential property on a non-permanent basis. Under the Deregulation Act 2015, short term residential letting of domestic premises which are liable for council

tax for less than 90 days in a calendar year does not require planning permission. Letting for periods of more than 90 days will require permission.

### **SINCs - Sites of Importance for Nature Conservation**

London's most valuable places for wildlife that provide local people with access to nature have been identified as Sites of Importance for Nature Conservation (SINCs). The sites are graded as being of Metropolitan, Borough or Local importance.

### **Smart infrastructure**

Infrastructure which includes sensors that produce, analyse and help to securely share data on the performance of the built and natural environment.

### **Social and community facilities**

Social and community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments, including the Town and Country Planning (Amendment) (England) Regulations 2020. The majority of social and community facilities fall within Class E (Commercial, business and services), Class F.1 (Learning and non-residential institutions) and Class F.2 (Local community uses) use classes. Community facilities include:

- Leisure and cultural facilities (including arts, entertainment and sport facilities)
- Community centres and meeting places (including places of worship)
- Libraries
- Facilities for children (from nursery provision to youth clubs)
- Education (including adult education)
- Healthcare facilities

### **SCI - Statement of Community Involvement**

A plan for public consultation on planning policy documents and planning applications. The City Corporation's SCI was adopted in 2016.

### **Strategic Cultural Areas**

Areas identified in the London Plan\* with internationally important cultural institutions, which are also major tourist attractions, and include the West End, South Bank/Bankside/London Bridge, Barbican, Wembley, the South Kensington museum complex/Royal Albert Hall, London's Arcadia, Olympic Park and Lee Valley Regional Park.

### **Strategic developments (applications referable to the Mayor)**

The planning applications that must be referred to the Mayor of London\* under the Town and Country Planning (Mayor of London) Order 2008 and any amendments hereto.

## **SEA - Strategic Environmental Assessment**

The environmental assessment of plans, required by EU Directive 2001/42/EC. It is carried out as part of the sustainability appraisal\*.

## **Strategic Flood Risk Assessment**

A document prepared by the Local Planning Authority to provide information on areas that may flood and on all sources of flooding as required by the NPPF\*.

## **SHLAA - Strategic Housing Land Availability Assessment**

A technical assessment to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework\*, paragraph 67).

In London, the Mayor of London\* carries out a London-wide SHLAA to inform the London Plan\* as it determines housing targets for each borough and the City of London. The City of London Local Plan relies on the land availability evidence provided by the London-wide SHLAA.

## **SHMA - Strategic Housing Market Assessment**

An assessment of future housing requirements in an area. The assessment informs the development of local and strategic plan strategies and housing targets and identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period including addressing the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

## **Street hierarchy**

Categorisation of streets in the City of London Transport Strategy\* which describes the function of every street in terms of motor traffic:

- **London Access Streets (TfL network):** Preferred streets for motor vehicles that do not have a destination in, or immediately adjacent to, the Square Mile.
- **City Access Streets:** Preferred streets for motor vehicles that are travelling around the Square Mile or to immediately adjacent destinations.
- **Local Access Streets:** Primarily used for the first or final part of a journey, providing access for vehicles to properties.

## **SPD - Supplementary Planning Document**

A document that explains the policies of the Local Plan\* in detail. It is subject to consultation, but not public examination\*.

## **SPG - Supplementary Planning Guidance**

Guidance prepared by the Mayor of London\* to explain policies of the London Plan\*.

## **SA - Sustainability Appraisal**

The Local Plan\* is subject to SA, which ensures that it is soundly based on the principles of sustainable development. SA is carried out as the policies are developed or reviewed so that they can take account of its findings. The SA of the City Plan 2036 has been combined with other assessment processes in an Integrated Impact Assessment (IIA)\*.

## **SuDS - Sustainable Drainage Solutions**

A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.

## **Traffic and Environmental Zone**

A security and surveillance cordon that surrounds the City of London. It consists of road barriers, checkpoints and closed-circuit television cameras with the aim of slowing, managing and monitoring vehicular movements entering the City.

## **Transport Assessment**

This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.

## **TfL - Transport for London**

The body, under the control of the Mayor of London\*, responsible for strategic transport policy and the provision of public transport, including buses and the underground. TfL is responsible for certain major streets in the City.

## **Transport Strategy**

A strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City's streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.

## **Travel Plan/Cycling Promotion Plan**

A long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.

## **Tower of London World Heritage Site Consultative Committee**

A committee of experts and policy makers providing guidance for the preparation and implementation of the Tower of London Management Plan, and comprising representatives from: Historic Royal Palaces, City Corporation, Historic England\*, GLA\*, International Council on Monuments and Sites (ICOMOS), Department of Culture, Media and Sport\* (DCMS) and the London Boroughs of Southwark and Tower Hamlets.

## **UNESCO - United Nations Educational, Scientific and Cultural Organisation**

Among UNESCO's responsibilities are the inscription of World Heritage Sites, which include the Tower of London.

## **Urban greening**

A process for delivering additional green infrastructure in the City of London. Due to the morphology and density of the built environment in the City, green roofs, green (or living) walls, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.

## **Urban Greening Factor**

A model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.

## **Urban heat island**

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, central London can be up to 10°C warmer than the rural areas around London. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

## **Use Classes Order**

A statutory instrument made by the Secretary of State under Section 22 of the Town and Country Planning Act 1990, subsequently amended several times, setting out broad classes of use for land and buildings.

## **Viability assessment**

An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements that can be provided.

## **Waste management**

The London Plan's\* definition of waste management includes its use for energy recovery or composting or recycle sorting and bulking but does not include waste transfer.

**Wheelchair accessible**

Homes built to Building Regulation Requirement M4 (3) (2) (b): Wheelchair user dwellings, where the dwelling is constructed to meet the needs of occupants who use wheelchairs.

Also includes hotel rooms which are built to be accessible to guests who use wheelchairs.

**Wheelchair adaptable**

Homes built to Building Regulation Requirement M4 (3) (2) (a): Wheelchair user dwellings, where the dwelling is constructed to allow simple adaptation to the dwelling to meet the needs of occupants who use wheelchairs.

**Windfall development/sites**

Housing development that does not take place on sites identified in the Development Plan\* or on the Policies Map\* but is brought forward by developers.

**World Heritage Site**

A site inscribed by UNESCO\* for its Outstanding Universal Value. The Tower of London, located just outside the City's boundaries, is designated as a World Heritage Site.

**Zero carbon**

Activity that causes no net release of carbon dioxide or other greenhouse gas emissions into the atmosphere.

**Zero waste**

Making the most efficient use of resources by minimising the City of London's demand on primary resources, and maximising the reuse, recycling and recovery of resources instead of treating them as waste.

**Zero Emission Zone**

Defined area where access by some polluting vehicles is restricted or deterred with the aim of improving air quality.

