

LD29- Modifications Document

This document updates examination document LD26: Proposed Changes and will be updated during the course of the examination hearings.

Table 1- List of Modifications

This list of changes includes all proposed changes for Matters 1 to 6 and Matter 8 as previously submitted to the examination under LD26, some of which were discussed within the hearing sessions (see asterisk). Proposed changes which are considered a ‘Main Modification’ to the plan ie- relate to soundness issues have been also assigned a MM number and a reason set out in the relevant column.

It is anticipated that the proposed changes for Matter 7 and Matters 9 to 19 as included in LD26 will be discussed at the sessions of w/c 28 April and 9 June 2025. Updates to this table will be provided at the end of these weeks.

Table 1

Chapter	Paragraph	PC Number	Main modification reason	Amended text
Chapter 1 Strategic Priorities	1.1.0	PC 1		1 <u>Vision and Strategic Priorities</u> 1.1.0 The City Plan sets out the City Corporation’s strategic priorities for planning the Square Mile, together The strategic priorities form the Vision for the City over the plan period to 2040 and set a framework for the Strategic Policies and other policies under each chapter. Together with policies that they will guide decisions on planning applications.
Chapter 1 Strategic Priorities	City Plan Vision	PC 2 (MM1) *	Effective	<u>By 2040 the City of London will have become:</u> 1. A stronger, more vibrant and competitive economy. The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. A 7-day-a-week destination. The city’s world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. A more sustainable city- The city has achieved its net zero aspirations and continues to lead in London’s climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. A more inclusive and healthier city- the city has been shaped by and for its communities, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. A place where heritage and positive change are celebrated- the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.

Chapter 1 Strategic Priorities	1.1.1	PC 3		1.1.1 To help realise our vision for the Square Mile, the City Plan 2040 sets out strategic priorities that underpin the policies in the Plan. These priorities have been informed by stakeholders, national and London-wide policy, and the strategies of the City Corporation and other partners.
Chapter 1 Strategic Priorities	1.1.2	PC 4 *		1.1.2- As set out in paragraph 8 of the National Planning Policy Framework (NPPF)..... [Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies]
Chapter 2 Spatial Strategy	2	PC 5		Page 12- corrections to numbering to follow sequentially, eg 2.1, 2.2
Chapter 2 Spatial Strategy	Figure 1	PC 6		Amendment to Figure 1 Key Diagram as follows: Green Corridors Links: Add reference to LB Hackney and Islington
Chapter 4 Housing	S2 (2) (a) S2 (2) (b)	PC 19 (MM2)	Positively prepared	2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City’s housing need and contributing to London’s wider housing needs by: ia. ensuring the delivery of <u>applying the Mayor’s threshold approach of a minimum of 35% affordable housing and</u> a minimum of 50% affordable housing on public sector land; b. 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 c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> 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.
Chapter 4 Housing	4.1.2	PC 20		4.1.2...Other residential areas are located in Smithfield, the Temples...
Chapter 4 Housing	4.1.8	PC 21 *		4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>
Chapter 4 Housing	4.1.10	PC 22		4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...
Chapter 4 Housing	4.1.11	PC 23 *		4.1.11 The City Corporation’s housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.

Chapter 4 Housing	4.1.12	PC24 (MM3) *	Effective	<p>4.1.12- 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 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</p>																																				
Chapter 4 Housing	New paragraph	PC25 (MM4) *	Effective	<p>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 2- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table><tr><th>Year</th><th>Numbers (after any conversion)</th><th>Status</th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr><tr><td><u>2022/23</u></td><td><u>96</u></td><td><u>Completions</u></td></tr><tr><td><u>2023/24</u></td><td><u>0</u></td><td><u>Completions</u></td></tr><tr><td><u>2024/25</u></td><td><u>29</u></td><td><u>Completions</u></td></tr><tr><td><u>2025/26</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td></td><td>2116</td><td></td></tr></table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>	<u>2022/23</u>	<u>96</u>	<u>Completions</u>	<u>2023/24</u>	<u>0</u>	<u>Completions</u>	<u>2024/25</u>	<u>29</u>	<u>Completions</u>	<u>2025/26</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>342</u>	<u>Completions (projected)</u>		2116	
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Appendix 2	New appendix	PC26 (MM7) *	Effective	<p>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th colspan="2">Target*</th><th></th><th></th></tr><tr><th>Year</th><th>per annum</th><th>Units</th><th>Status</th></tr><tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr><tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr><tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr><tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr><tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr><tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr><tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr><tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr><tr><td>Total</td><td>1706</td><td>2430</td><td></td></tr></table>	Target*				Year	per annum	Units	Status	2025/26	146	41	Completions (projected)	2026/27	146	97	Completions (projected)	2027/28	146	580	Completions (projected)	2028/29	146	342	Completions (projected)	2029/30	102	0	Completions (projected)	2030/31	102	120	Completions (windfalls)	2031/32	102	120	Completions (windfalls)	2032/33	102	120	Completions (windfalls)	2033/34	102	120	Completions (windfalls)	2034/35	102	120	Completions (windfalls)	2035/36	102	120	Completions (windfalls)	2036/37	102	120	Completions (windfalls)	2037/38	102	120	Completions (windfalls)	2038/39	102	190	Completions (windfalls and capacity)	2039/40	102	220	Completions (windfalls and capacity)	Total	1706	2430	
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Chapter 4 Housing	4.1.15	PC 27 (MM5) *	Effective	4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.																																																																								
Chapter 4 Housing	4.2.11	PC 28		4.2.11 ...On public sector owned land, the higher 50% target will be applied as set out in the London Plan, except where, in accordance with London Plan policy H4, there is a portfolio agreement with the Mayor of London.																																																																								
Chapter 4 Housing	4.2.15	PC 29		2.2.15 ...Both the City’s SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the Square Mile, it is considered and that social rented units would will often 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, considering having regard to evidence of need (as set out in the SHMA and its Supplement) in the City and London Plan requirements.																																																																								
Chapter 4 Housing	4.4.0	PC 30		The net loss of existing housing units, including to other residential products such as student or co-living, will be resisted because of the limited opportunities to replace it in the City.																																																																								

Chapter 4 Housing	HS3	PC 31		<p>The amenity of existing residents will be protected by:</p> <p>1. Resisting resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements</p> <p>(new numbering propsoed)</p>
Chapter 4 Housing	HS6 (2)	PC 32		HS6 (2) Proposals for PBSA should be supported by and secured through a nominations agreement with an identified further or higher educational institutions operating in the City of London or the CAZ.
Chapter 4 Housing	HS6 (3)	PC 33		HS6 (3) 35% of student accommodation rooms on a site should be secured as affordable student accommodation as defined through the London Plan and associated guidance.
Chapter 4 Housing	4.8.3	PC 34		4.8.3 Student accommodation, like all development in the Square Mile, should meet the highest standards of accessibility and inclusive design. To help achieve this, the appropriate proportions of accessible rooms should be provided, in line with guidance issued by the Greater London Authority, which advises that the relevant part of London Plan Policy E10 Part H applies to development proposals for new non-self-contained student accommodation. <u>In accordance with Policy VT3 disabled parking is expected to be provided for student accommodation.</u>
Chapter 5 Offices	5.1.1	PC 35		The minimum requirement of overall office floorspace target of 1,200,000m2 net internal area is derived from the estimated growth in office employment between 2021 and 2040...
Chapter 5 Offices	5.1.2	PC 36		The minimum requirement demand target is the central of three projections, based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central figure target is aligned with GLA 2022-based long term employment projections for London and the Square Mile.
Chapter 5 Offices	5.3.9	PC 37		<p>5.3.9...Where a change in <u>of</u> use is proposed from office floorspace to another use,...</p> <p>....It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area.</u></p>
Chapter 6 Retail	RE2(3)	PC 38 *		3. <u>New retail provision will be encouraged in active frontages and the</u> The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required.
Chapter 7 Culture and Visitors	S6	PC 39 *		<p>S6 ...enhance the City of London's cultural <u>infrastructure</u>...</p> <p>S6 (2)a wide range of cultural <u>infrastructure</u>, and leisure, and recreation <u>and visitor</u>...</p> <p>S6 (3)...areas of cultural <u>infrastructure significance</u> including cultural buildings and leisure, and recreation <u>and visitor</u> facilities...</p> <p>S6 (5)...seeking opportunities to embed heritage in the cultural <u>infrastructure offer</u>...</p> <p>S6 (7)... supports the City's cultural <u>infrastructure or businesses primary business or cultural role of the City</u>...</p> <p>S6 (8)... especially in areas of night-time activity and around cultural <u>infrastructure, including</u> and tourist...</p> <p>S6 (9)...Maintaining the City's <u>cultural infrastructure, including</u> existing artworks...</p>

Chapter 7 Culture and Visitors	7.1.0	PC 40*		7.1.0.....in the streets and informal spaces in between and to recognise this the plan takes forward a ‘Cultural Ecosystem’ approach deployed in the Cultural Planning Framework. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Within the Cultural Ecosystem, cultural infrastructure makes up the primary sites where culture is either produced or consumed. This includes production in creative education, workspaces, studios, livery halls and places of worship; and consumption in museums, art galleries, cinemas, livery halls, libraries, theatres, performance venues and places of worship. Churches and other places of worship are deeply embedded in the fabric of the city and are key locations for the production and consumption of culture, often open for free every day of the year. These include buildings, structures and spaces where culture is either consumed (culture consumption spaces) or produced (culture production spaces) such as creative workspaces, arts galleries, studios, museums, theatres, Livery Halls, libraries, music, sports, entertainment and performance venues; and complementary uses which contribute to the primary culture, leisure and recreation function such as restaurants, retail, hotels, open spaces and tourism facilities. Cultural contributors are complimentary uses that facilitate cultural infrastructure, these can include restaurants, bars, clubs, public houses, retail areas and tourism facilities.....
Chapter 7 Culture and Visitors	7.1.4	PC 41		7.1.4...and changes of use to protect existing cultural infrastructure, and leisure, recreation and visitor, arts and cultural facilities....
Chapter 7 Culture and Visitors	7.1.5	PC 42		7.1.5 The City Corporation’s Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. When developing cultural proposals applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.
Chapter 7 Culture and Visitors	CV1	PC 43		CV1 (Title) Protection of Existing Cultural Infrastructure, and Leisure, Recreation and Visitor Arts and Cultural Facilities. CV1 (1).... loss of existing cultural infrastructure, and leisure, recreation and visitor visitor, arts, and cultural facilities.... CV1 (2).... Proposals resulting in the loss of cultural infrastructure, and leisure, recreation and visitor arts and cultural facilities.... ...Loss of facilities will only be permitted where this would facilitate the overall enhancement of cultural, leisure, recreation or visitor, arts or cultural provision.....an alternative cultural, leisure, recreation or visitor, arts or cultural use at reasonable terms for such a use....
Chapter 7 Culture and Visitors	7.2.0	PC 44		7.2.0....accommodate these uses. In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption.....
Chapter 7 Culture and Visitors	7.2.2	PC 45		7.2.2....applicants will be required to demonstrate that an existing cultural infrastructure, and leisure, recreation and visitor, arts or cultural facilities sy has been marketed....
Chapter 7 Culture and Visitors	CV2	PC 46		CV2 (Title) Policy CV2: Provision of Cultural Infrastructure, Arts, Culture and Leisure, Recreation and Visitor Facilities CV2 ...provide new cultural infrastructure, leisure, recreation and visitor arts, cultural and leisure facilities... CV2 (2)...on-site for cultural infrastructure, arts, culture or leisure, recreation or visitor facilities; CV2 (3)...make provision for cultural infrastructure, arts, culture or leisure, recreation or visitor facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards cultural infrastructure, arts, culture and leisure, recreation or visitor facilities and infrastructure. CV2 (4)...provision of cultural infrastructure, arts, culture and leisure, recreation or visitor facilities...
Chapter 7 Culture and Visitors	7.3.0	PC 47		7.3.0...The provision of new cultural infrastructure, arts, culture and leisure, recreation and visitor facilities....
Chapter 7 Culture and Visitors	7.3.2	PC 48		7.3.2...including the type and scale of the cultural infrastructure, arts, culture or leisure, recreation or visitor offer...
Chapter 7 Culture and Visitors	7.3.3	PC 49		7.3.3 Cultural infrastructure, Arts, culture and leisure, recreation and visitor facilities...

Chapter 7 Culture and Visitors	7.3.4	PC 50		7.3.4...management requirements of cultural <u>infrastructure</u> and leisure, <u>recreation or visitor facilities</u> provided in new developments prior to approval. An outline robust management plan for operational and management arrangements should be submitted as part of the Culture Plans at the pre-application stage, <u>to be completed in detail at application stage.</u>		
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	PC 51 *		New paragraph 7.3.4		
				<u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u>		
					On Site	Off Site
				<u>> 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>
	<u>< 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been identified. Provision can be through a direct intervention to support the project or through a financial contribution. As per paragraph 7.3.5, financial contributions can be pooled.</u>			
Chapter 7 Culture and Visitors	CV3	PC 52		CV3 The provision of facilities that meet the needs of visitors in within new cultural <u>infrastructure developments</u> and in nearby open spaces...		
Chapter 7 Culture and Visitors	CV 3 (2)	PC 53*		2. Structures and landscaping to enable children’s play and provide facilities for school groups 3. <u>Facilities for school groups</u>		
Chapter 7 Culture and Visitors	New paragraph 7.4.1	PC 54 *		<u>New paragraph 7.3.4</u> <u>Churches and other places of worship are a key component of the overall visitor experience and help create the distinctive look and feel of the City. They provide many of the facilities that visitors require such as: calm green spaces to stop and rest; shelter that is free to access; cafes and toilets; and activities for school groups. They also attract visitors with a diverse cultural, historical and religious offer.</u>		
Chapter 7 Culture and Visitors	CV4 (2)	PC 55		CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts		
Chapter 7 Culture and Visitors	CV6 (1)	PC 56		CV6 (1)...public and private land <u>and buildings;</u> b. protecting existing works of art, statues, memorials and other objects of <u>communal and</u> cultural significance;... e. <u>encouraging the use of new emerging artists, and those from under-represented groups and public art programmes</u>		
Chapter 9 Design	S8 (4)	PC 57		S8 (4) Delivers world class sustainable buildings that are adaptable and informed by, <u>designed with best practice</u> circular economy principles and that treat materials as a <u>valuable</u> resource.		
Chapter 9 Design	S8 (5)	PC 58		S8 (5)Embeds climate resilience into <u>the early design concept to and</u> contributes to the resilience of the Square Mile; and..		
Chapter 9 Design	S8 (6)	PC 59		S8 (6) Seeks opportunities to contribute to the wider sustainability of the City and (where relevant) neighbouring boroughs, especially where development would result in substantial <u>embodied</u> carbon emissions.		
Chapter 9 Design	S8 (8)	PC 60		S8 (8) Delivers buildings and spaces that have the right an appropriate <u>scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the Character Areas Study.</u>		

Chapter 9 Design	S8 (9)	PC 61		S8 (9) Optimises pedestrian movement by maximising permeability at street level, providing external and where feasible internal pedestrian routes which are inclusive, welcoming, convenient, comfortable and attractive, enhancing the City's characteristic network of accessible buildings, streets, <u>squares</u> , courts and alleys;
Chapter 9 Design	9.1.0	PC 62		9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.
Chapter 9 Design	9.1.1	PC 63		9.1.1 Retrofitting existing buildings will in many cases result in lower whole lifecycle <u>upfront embodied</u> carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials.
Chapter 9 Design	9.1.3	PC 64		9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.
Chapter 9 Design	9.1.4	PC 65		9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits for the site, its context and the whole City before considering the many wider <u>other</u> design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.
Chapter 9 Design	9.1.5	PC 66		<u>9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.</u>
Chapter 9 Design	DE1 (1)	PC 67		DE1 (1) Development proposals should follow <u>adopt</u> a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting. At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.
Chapter 9 Design	DE1 (2)	PC 68		DE1 (2) All major development must undertake an assessment of the <u>feasible</u> options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish to inform the most sustainable and suitable approach for the site.
Chapter 9 Design	DE1 (3)	PC 69		DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>
Chapter 9 Design	DE1 (7)	PC 70		7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. Retention, refurbishment, retrofit and reuse <u>Reuse, refurbishment and retention</u> of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase
Chapter 9 Design	DE1 (8)	PC 71 *		DE1 (8) Proposals for major development will be required to: a. 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, materials, waste and pollution). Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the waste category; b. Commit to achieving a minimum NABERS UK rating of 5 stars; Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only); c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.

Chapter 9 Design	9.2.0	PC 72		9.2.0 Materials – retaining reducing embodied carbon emissions from new build construction through retrofit and in existing buildings and materials, and improving resource efficiency.
Chapter 9 Design	9.2.3	PC 73		9.2.3 Proposals for substantial demolition and reconstruction should have regard to the whole-life carbon whole life-cycle carbon impact, resource and energy use, when compared to the existing building.
Chapter 9 Design	9.2.9	PC 74 *		<p>9.2.9 For major development (where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more) the following information should be provided:</p> <ul style="list-style-type: none"> - 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. - A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period. - An energy assessment in line with the Mayor of London’s Energy Planning Guidance - An options appraisal following the City Corporation’s Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits - An air quality assessment to meet the requirements of the London Plan demonstrating that the development will not result in deterioration in air quality be at least Air Quality Neutral, in line with the City of London Air Quality SPD. - Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole. which has been incorporated to address environmental challenges. - 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. <p>Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation’s Carbon Options...</p>
Chapter 9 Design	9.2.9	PC 75		<p>9.2.9 Extensions</p> <ul style="list-style-type: none"> • 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, carbon options appraisal and BREEAM requirements. <p>For minor development</p> <ul style="list-style-type: none"> • 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. • For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.
Chapter 9 Design	DE3 (7)	PC 76		DE3 (7) The need to Opportunities to integrate high quality public art as part of the public realm design;
Chapter 9 Design	DE4 (3)	PC 77 (MM6) *		3. Requiring all tall buildings or major developments to provide free to enter....
Chapter 9 Design	9.6.5/9.6.6	PC78		New paragraph number 9.6.6 Retail entrances – including alterations to existing buildings – should be designed with level entrances and doorways that enable inclusive access by all.

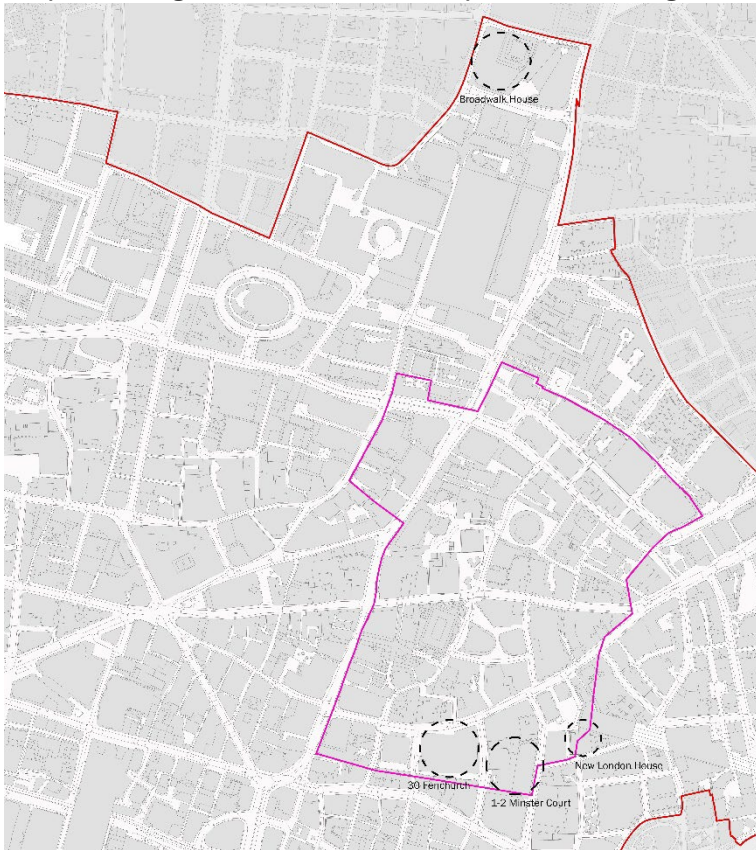
Table 2- March 2025 Statements of Common Ground

Minor amendments which arose through Statements of Common Ground with the Greater London Authority and Transport for London.

Chapter	Paragraph	PC Number	Main modification reason	Amended text
Chapter 10 Transport	10.10.1	PC107		<u>A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions.</u> A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision.
Chapter 10 Transport	Policy VT3	PC108		All off-street non-residential car parking facilities bays must be equipped with active electric vehicle charging points usable from the outset ’.
Chapter 15 Implementation	Policy S26	PC109		<i>Amendment to PC 103 and 104 (LD26)</i> (2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations. (3) Requiring s106 planning obligations having regard to the impact of the obligation on the viability of development, for: <u>Remove 2(b) and reorder b-g</u>
Chapter 11	11.4.0	PC109		<u>The City Corporation has interpreted the ToL’s OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL’s OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u> Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted</u>

PART 2

Table 3- Statements of Common Ground- potential changes

Chapter	Paragraph	PC Number	Reason	Description of changes								
Policies Map Figure 14 Figure 15 Key Diagram Para 2.1 (12) 11.5.4 11.5.6		PC110	SOCG17 SOCG20 SOCG19 SOCG22	<div>Location and description of the potential changes to the tall buildings contours which will be subject to further Strategic View Impact Assessment and Heritage Impact Assessment. This will be completed and shared at least 4 weeks in advance of week 3 of the hearings (w/c 9 June 2025). These will be discussed at the examination hearings, for consideration at:</div> <table><tr><td>1-2 Minster Court</td><td>Potential minor amendments over this site to create the possibility of heights of between 90m –100m and 100m-120m subject to further SVIA and HIA</td></tr><tr><td>New London House</td><td>Minor adjustments may be appropriate subject to further SVIA and HIA</td></tr><tr><td>30 Fenchurch Street</td><td>Minor adjustments may be appropriate subject to further SVIA and HIA</td></tr><tr><td>Broadwalk House</td><td>Potential for identification of new tall building site</td></tr></table> <div>Map showing the locations of the potential changes in relation to the City Cluster Tall Building Area.</div> 	1-2 Minster Court	Potential minor amendments over this site to create the possibility of heights of between 90m –100m and 100m-120m subject to further SVIA and HIA	New London House	Minor adjustments may be appropriate subject to further SVIA and HIA	30 Fenchurch Street	Minor adjustments may be appropriate subject to further SVIA and HIA	Broadwalk House	Potential for identification of new tall building site
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